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30 March 2017

To Whom It May Concern:

Bupa welcomes the opportunity to provide input to the preparation of the Australian Competition and Consumer Commission's (ACCC) Annual Report to the Senate on "anti-competitive and other practices by health funds and providers in relation to health insurance for the period 1 July 2015 to 30 June 2016".

Bupa is committed to providing clear information to enable our members to make informed decisions about their individual health and care needs. Bupa actively engages with its members to help ensure they are informed of all changes that may affect their cover. In addition, Bupa has voluntarily committed to additional obligations under the Private Health Insurance (PHI) Code of Conduct (**the Code**) as well as introducing clear and transparent communications in excess of the Code.

Since meeting initially with you on this topic in October 2015, Bupa has focussed on:

- introducing a new program, **Customer Friendly Language**, to improve overall simplicity, clarity and consistency of language used in all customer-facing content;
- undertaking a major review of our web content and information architecture, to make our web content easier for our customers to understand, as part of our plans to develop a new Bupa website within our **Customer Transformation program**;
- reviewing both our **Fund Rules and the Important Information Guide**, to improve the overall transparency, clarity, and consistency of information for our members.

Website Content Updates

Bupa has implemented suggested changes, including:

- describing what hospital costs are from the outset to reduce confusion between hospital and medical costs;
- defining clearly what inpatient and outpatient mean; and
- providing additional links for easier navigation between web pages containing critical information, such as contact details, glossary, and provider information.

Customer Friendly Language

Since some words considered common nomenclature are jargon to people outside the health insurance industry, Bupa is working to create more consistency and provide the utmost clarity in all communications to our customers.



Customer Transformation Program

Bupa's *Customer Transformation* program is an initiative for Bupa to respond better to customer needs by improving our processes and the quality of our advice to customers, and to make our interactions with our customers more consistent.

Bupa has developed several external initiatives in 2016 which improve advice directly to customers and strengthen our information provision practices:

- **Ancillary quoting through HICAPS:** this allows customers and providers to understand the product entitlement, with customers now able to get an estimate of out-of-pocket expenses for ancillary claims at the point of service.
- **Out of Pocket** online tool: The Out of Pocket tool helps members understand how costs are calculated.

Revised Fund Rules and Important Information Guide

Bupa has been in the process of reviewing both its Fund Rules and the Important Information Guide, to improve the overall transparency, clarity, and consistency of information for our members.

Bupa believes that these initiatives are extremely important elements of Bupa's ongoing review process that it is engaged in to help ensure that the information provided to its members (and potential members) is accessible, easy to understand and thorough.

Private Health Insurance Ombudsman (PHIO) Referrals			
	PHIO Total Complaints	Complaints referred to PHIO relating to PHI Rules, Regulations & Guidelines	Total % of complaints raised
2015	986	283	29%
2016	802	223	28%

Bupa experienced a decrease between 2015 and 2016 in total complaints which escalated to the PHIO, as well as the proportion of complaints referred to the PHIO specifically relating to PHI rules, regulations, and guidelines.

Bupa is willing to provide further detail on any of these initiatives mentioned, if they are of interest to the ACCC. Bupa is strongly committed to providing clear information to enable members to make informed decisions about their individual health and care needs.

Yours sincerely,

Dr Dwayne Crombie
Managing Director, Health Insurance