

Submission by [REDACTED] -21 June 2024

I do not agree that St Lukes should get legal protection from competition laws to allow them to have special pricing arrangements with certain dental practitioners. St Lukes has even asked to be allowed to commence with agreements with potential dental partner providers prior to the ACCC's final determination! St Lukes have been working with dentists in Tasmania to transfer patients, from other health funds that have these arrangements, to them. They have benefited from telling us that they will not do the same. • Consumers should be able to choose their dentist, and their insurer, based on competition on the merits in each activity. Rebates to consumers offered by insurers should be the same regardless of which dentist the consumer chooses to visit, as this is a healthcare decision by the patient. • Consumers should be able to have confidence that their choice to use private health insurance will never result in their insurer being able to undermine clinical confidentiality or treatment decisions agreed by them with their chosen dentist in a clinical setting. If an insurer wants to offer its members a financial incentive to choose its own or partner dental practices, it should do this via the price of the dental services at its own or partner practices (i.e. price capping under an authorisation where the ACCC can assess the critical factors referred to above). The insurer should not be allowed to create financial disincentives for members who choose to use a dental practice that is not owned by or aligned with their insurer (i.e. differential rebates).