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Mr Gennady Kleiner
Director
Adjudication
Australian Competition and Consumer Commission
By email: adjudication@accc.gov.au

Dear Mr Kleiner

AMA Submission to the ACCC's Financial Services Council application for authorisation AA1000494 – life insurance commitment consultation

Thank you for inviting the AMA to provide feedback on the ACCC's interim authorisation granted to the Financial Services Council (FSC) for changes to life insurance provisions for frontline health care workers during COVID-19. Overall, the AMA supports this move as it will ensure that all healthcare workers are not denied access to life insurance, will not be charged higher premiums and will not have benefits excluded, purely due to exposure, or potential exposure, to COVID-19.

In response to the terms of the two main issues noted, the AMA position is as follows:

- The AMA was notified by concerned members and by concerned members of the public about life insurance companies planning to deny cover to doctors and other health professionals because of COVID-19, of existing policies not covering death as a result of COVID-19, and of policies charging increased premiums for doctors working in frontline healthcare roles. As such, the AMA supports the initial authorisation.
- The AMA remains supportive of the determination and as modelling shows that COVID-19 will remain a public health threat for near future, extending the authorisation by 12 months is a sensible response. The AMA understands that the lack of public consultation prior to the determination was due to time pressures and welcomes the ongoing communication with key stakeholders in order to ensure that it is achieving the desired outcomes.

It is important that doctors can continue to attend work safe in the knowledge that they have adequate life insurance and this authorisation is important to the extent that it encourages their ongoing participation in the workforce.

Yours sincerely



Warwick Hough
Director
General Practice and Legal Services Department