

7 July 2020

Mr Gennady Kleiner  
Director  
Adjudication  
Australian Competition and Consumer Commission

Dear Mr Kleiner

**Financial Services Council – AA1000494 – Submission**

The Royal Australian College of General Practitioners (RACGP) thanks the Australian Competition and Consumer Commission (ACCC) for the invitation to provide a submission regarding this draft determination. The RACGP is Australia's largest professional general practice organisation, representing over 41,000 members working as specialist general practitioners (GPs) or towards a career in general practice.

The RACGP welcomes the commitment by life insurance companies and the Financial Services Council to ensure that life insurance for healthcare workers is not adversely affected by their essential roles in protecting the community from COVID-19. Healthcare workers at the frontline of the COVID-19 emergency and are tirelessly working to ensure that all Australians are safe and healthy throughout this crisis.

Many GPs are experiencing financial hardship during these times, due to, amongst other issues, [restrictions on ordinary billing practices](#), [patient hesitation to see a doctor](#), [the proliferation of "pop-up" telehealth services](#), [threats to other income streams](#) and increased practice expenditure, eg on protective equipment and administration. Most, if not all, GPs will also be feeling a [more general increased strain from other COVID-19 issues](#) related to their work, such as increased workloads and concerns around exposing their families to risk.

This commitment, if approved by the ACCC through this draft determination and implemented by life insurance companies, may help relieve these pressures on GPs. It is important that GPs are covered, particularly as they face significant risk of exposure to COVID-19 during the pandemic when providing patient care and as evidence of safe practice and long term effects is emerging. As such, the RACGP is pleased to support the draft determination, though noting the following reservations:

1. This is a voluntary undertaking and life insurance companies may opt-in/-out, which precludes any guarantee to healthcare workers that their life insurance will not be affected by their work to protect the community from COVID-19.
2. The proposed conduct will only be permissible for 12 months, following which insurance companies may impose additional constraints or burdens on healthcare workers due to risks inherent to their critical roles.
3. The minimum commitment on income protection cover is unlikely to sufficiently provide for a loss of income by GPs and other medical and health professionals.

The RACGP considers, however, that these issues should not affect the timely approval and implementation of the practices proposed in the draft determination. The RACGP agrees with the ACCC that this application is "likely to result in a public benefit [that] would outweigh any likely detriment to the public".

Please contact Michelle Gonsalvez, National Manager, Policy and Advocacy, on [REDACTED] or via [REDACTED] should you wish to discuss this issue further.

Yours sincerely



**Dr Harry Nespolon**  
President