

Bupa Dental Care submission to ACCC



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Dear Rebecca,

Re: Australian Dental Association Inc (ADA) application for revocation of authorisation AA1000638 and substitution of AA1000669

Thank you for the opportunity to comment on the ADA's application for a 5-year authorisation under the *Competition and Consumer Act 2010* (Cth) permitting independent dentists at multi-practitioner clinics (where at least one dentist is an ADA member) to make and give effect to contracts, arrangements and understandings regarding the fees charged for dental services at those clinics.

Dental Corporation Pty Ltd (**Bupa Dental Care** or **BDC**) is a dental support organisation that, at the time of writing, operates 176 dental clinics in which we provide facilities and services to independent dentists, the vast majority of which are multi-practitioner clinics. Based on our experience and observations as a dental support organisation, we support the ADA's application and believe that granting the authorisation will substantially benefit consumers. In particular, we believe granting such an authorisation will deliver the following key consumer benefits:

1. Consumers will have certainty about price – reducing potential confusion and 'bill shock', and promoting transparency and choice

By permitting dentists to, for example, set and display standard fees for the services provided at a multi-practitioner clinic, the authorisation will allow consumers to evaluate the cost of a prospective treatment before deciding whether to proceed with that treatment. They can also then avoid the potentially unpleasant and confusing task of having to compare the prices charged by different dentists at the same clinic or, worse, accepting whatever price is charged, even if it exceeds their budget. Overall, we believe the authorisation will not only permit, but encourage, price transparency across the dental industry, for the benefit of all consumers.

2. Consumers will benefit from better and greater continuity of care

By allowing dentists at multi-practitioner clinics to collaborate on price, we expect the authorisation to encourage dentists at such clinics to take a collaborative and patient-centred approach to providing dental care. Knowing



what their colleagues will charge will allow dentists to confidently refer patients to those colleagues based on patients' needs and the expertise required, and at times when the dentist takes planned or unplanned leave. This will help ensure patients receive continuity of care and the dental treatment they need, rather than whatever care a single dentist can provide, when they can provide it.

3. Consumers will benefit from better skilled, knowledgeable and happier clinicians

By fostering collaboration, the authorisation will help create a more collegiate environment in which dentists can embrace a consultative, 'teamwork' based approach that raises their collective expertise for the benefit of all the clinic's patients. This 'teamwork' approach to care may also enhance clinicians' work-life balance and promote greater workforce participation by those who require flexibility. In our view, dentists who can work in ways that suit their needs and lifestyle are also likely to be happier, resulting in them delivering better care for their patients. This, in turn, promises to raise the standard of care delivered to all consumers of dental services.

Thank you again for the opportunity to comment on the ADA's application. If you wish to discuss this submission, please don't hesitate to contact me via guneet.sawhney@bupa.com.au.

Yours sincerely

Guneet Sawhney

Guneet Sawhney
Bupa Dental Care, Director