

s47F, s47E(c)

From: s47F <s47F@bupa.com.au>
Sent: Friday, 29 May 2026 2:30 PM
To: FOI
Cc: s47F
Subject: RE: Freedom of Information Request 26-2991 - Opportunity to make a submission - Bupa Asia Pacific [SEC=OFFICIAL]
Attachments: FOI Redaction Table.pdf; FOI 26-2991 - Third Party Consultation Pack - Bupa Asia Pacific_Redacted (002).pdf

OFFICIAL

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Hi s47F, s47E(c),

Thank you for sharing the relevant freedom of information request (**Fol Request**).

Bupa HI Pty Ltd has considered the Fol Request and in accordance with the relevant provisions under the *Freedom of Information Act 1982 (Cth)* has provided our responses to the proposed release in the attached table. We have also included a version of the Fol Request with our requested redactions.

In addition to the attached requested redactions, in Document 52, please remove my name s47F from the subject line and content of the email. The reason would be s33(1) - disclosure of personal information including name.

Please let us know if there is anything further you require in relation to this request.

Thanks,

s47F, Director Public Affairs
Bupa Asia Pacific, 33 Exhibition Street, Melbourne VIC 3000
M s47F E s47F @bupa.com.au W bupa.com.au



OFFICIAL

From: FOI
Sent: Thursday, 21 May 2026 2:09 PM
To: s47F
Cc: FOI
Subject: Freedom of Information Request 26-2991 - Opportunity to make a submission - Bupa Asia Pacific [SEC=OFFICIAL]

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Dear ^{s47F}

The Department of Health, Disability and Ageing (the department) has received a request seeking access to the following under the *Freedom of Information Act 1982* (Cth) (FOI Act) relating to Bupa Asia Pacific.

Please note we are consulting with Bupa Global (via ^{s47F}) separately.

Documents captured in scope

The attached documents were captured within the scope of the applicant's request and include personal and/or business affairs information.

Under sections 27 and 27A of the FOI Act, where the department receives a request for access to documents containing 'business information' and/or 'personal information' and the department believes the relevant organisation and/or individual may wish to contend information within the documents is exempt from release, the department is required to consult the relevant organisation and/or individual before making a decision to release that information.

Please note, the documents provided to you by the department in relation to this FOI request are not a reflection of the department's views in relation to exempt material.

For your action

We are now providing you with the opportunity to advise the department if you have any concerns with your information being released to the applicant under the FOI Act.

By providing submissions to the department, you will be informing the decision maker of your stance on the release of the information relating to Bupa.

Please provide any comments you may have by **Friday 29 May 2026**. If you require further time for review, please let me know.

Should you choose not to respond by this date, the decision maker will consider you have no objections to the release of the relevant documents and will proceed to make a decision on access to the documents.

Relevant grounds of exemption

The relevant grounds of exemption are:

Section 47 – Documents disclosing trade secrets or commercially valuable information.

- Documents are exempt if release would disclose trade secrets or information having a commercial value that would be, or could reasonably be expected to be, destroyed or diminished if the information were disclosed.

Section 47F – Personal privacy (public interest conditional exemption).

- Documents are conditionally exempt if disclosure would involve the unreasonable disclosure of personal information about any person (including a deceased person). In deciding whether

disclosure would be unreasonable, the decision maker will also consider the extent to which the information is well known, whether the relevant individual is known to be (or to have been) associated with the matters dealt within the document, the availability of the information from publicly accessible sources and any other matters that the decision maker considers relevant. **Note:** This exemption is only available if, in addition to the above details, it can be demonstrated that granting access would be, on balance, contrary to the public interest.

Section 47G – Business (public interest conditional exemption).

- Documents are conditionally exempt if disclosure would disclose information concerning a person in respect of his or her business or professional affairs or concerning the business, commercial or financial affairs of an organisation or undertaking would, or could reasonably be expected to, unreasonably affect that person adversely in respect of his or her lawful business or professional affairs or that organisation or undertaking in respect of its lawful business, commercial or financial affairs. **Note:** This exemption is only available if, in addition to the above details, it can be demonstrated that granting access would be, on balance, contrary to the public interest.

Third party review rights

If the department decides after consultation with you to grant access contrary to your submissions, you will be notified of your right to seek an internal or Information Commissioner review of the decision to grant access.

Further information on third party review rights can be found at <https://www.oaic.gov.au/freedom-of-information/guidance-and-advice/personal-and-business-information-third-party-review-rights/>.

Disclosure log

You should be aware, if the department decides to grant access to the documents, or parts thereof, it is a requirement that they be published on the department's FOI [Disclosure Log](#), unless one of the exceptions in s11C of the FOI Act apply. If you consider it would be unreasonable for some or all of the documents to be published, please indicate this in your response. A Disclosure Log decision is not reviewable, but the department would take your views into account.

Applicant's review rights

The FOI applicant has rights of review under the FOI Act. These include external review by the Australian Information Commissioner and the Administrative Appeals Tribunal. If the decision is to exempt any material in accordance with any submission you may make, your submission may be required to be given to the external reviewer.

Provisions of the FOI Act

The relevant provisions of the FOI Act can be found at www.legislation.gov.au/Series/C2004A02562. In addition, further guidance about the FOI Act can be found at [FOI Guidelines](#).

Contacts

If you require clarification of any of the matters discussed in this email, please do not hesitate to contact us on the details below.

Kind regards

s47F, s47E(c)

**Director – Freedom of Information
Commercial and Information Law**

Legal Division | Corporate Operations Group
Australian Government Department of Health, Disability and Ageing
T: 02 6289 1666 | E: foi@health.gov.au

This email comes to you from Boonwurrung country
Location: Melbourne
PO Box 9848, Canberra ACT 2601, Australia

The Department of Health, Disability and Ageing acknowledges First Nations peoples as the Traditional Owners of Country throughout Australia, and their continuing connection to land, sea and community. We pay our respects to them and their cultures, and to all Elders both past and present.

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FOI 26-2991 – Third Party Consultation Pack – Bupa Aasia Pacific – Redacted**Privileged and Confidential**

Document Number	What has been redacted	Reason for redaction	NOTES
Document 49	Contact details	Information has been redacted under section 33 (1) of the <i>Freedom of Information Act (Cth) 1982 (Fol Act)</i> , as its disclosure would involve the unreasonable disclosure of personal affairs information, including name and contact details	
Document 50	This has been redacted because of sensitive commercial information	Information has been redacted under section 34(1) of the Fol Act, as its disclosure would reveal business, commercial or financial information and would be likely to unreasonably disadvantage the relevant undertaking.	
Document 51	Names of individuals	Information has been redacted under section 33(1) of the Fol Act, as its disclosure would involve the unreasonable disclosure of personal affairs information, including name and contact details	
Document 52			Nothing has been redacted
Document 54	Contact details + Name of individuals	Information has been redacted under section 33(1) of the Fol Act, as its disclosure would involve the unreasonable disclosure of personal affairs information, including name and contact details	
Document 55	Contact details + Name of individuals	Information has been redacted under section 33(1) of the Fol Act, as its disclosure would involve the unreasonable disclosure of personal affairs information, including name and contact details	
Document 56	Contact details + Name of individuals	Information has been redacted under section 33(1) of the Fol Act, as its disclosure would involve the unreasonable disclosure of personal affairs information, including name and contact details	

From: s47F, s47E(c)
Sent: Wednesday, 24 September 2025 9:53 AM
To: s47F
Cc: s47F, s47E(c), s47F, s47E(c)
Subject: RE: RE: Meeting next week to discuss a Bupa Global Matter [SEC=OFFICIAL]

OFFICIAL

Hi s47F

Thanks for sharing your and s47F contact details. We'll reach out to the Bupa Global member and suggest they contact you for assistance.

Friday's meeting really expanded my understanding of the complexities of private health insurance around the transition from a non-citizen to becoming Medicare eligible. As mentioned, s47F, s47E(c) and s47F, s47E(c) are on leave right now, but I think that they would be interested in hearing more. Once they're back on deck, I'll arrange a meeting with s47F to discuss it further.

Kind regards,

s47F, s47E(c)

s47F, s47E(c) she/her)

Compliance Section
Private Health Strategy Branch

Health Systems Strategy Division
Strategy and First Nations Group
Australian Government Department of Health, Disability and Ageing
T: 02 5132 s47F, s47E(c) | E: s47F, s47E(c) @health.gov.au
GPO Box 9848, Canberra ACT 2601, Australia

The Department of Health, Disability and Ageing acknowledges the Traditional Custodians of Australia and their continued connection to land, sea and community. We pay our respects to all Elders past and present.

OFFICIAL

From: s47F <s47F@bupa.com.au>
Sent: Tuesday, 23 September 2025 12:15 PM
To: s47F, s47E(c) <s47F, s47E(c)@Health.gov.au>
Cc: s47F, s47E(c) <s47F, s47E(c)@health.gov.au>; s47F
s47F @bupa.com.au>
Subject: Re: RE: Meeting next week to discuss a Bupa Global Matter [SEC=OFFICIAL]

OFFICIAL

Hi s47F, s47E(c) and s47F, s47E(c),

Thanks again for your time to discuss this Bupa Global customer issue last Friday.

As mentioned, if the member/s involved would like to contact Bupa directly, please pass on my email address and that of ^{s47F} [REDACTED], Complaint Support Manager in our customer team ^{s47F} [REDACTED] [@bupa.com.au](mailto:[REDACTED]@bupa.com.au)).

Regarding broader consideration of the health insurance journey for non-citizens, from OSHC to OVC to becoming Medicare-eligible and covered by domestic PHI, we would be happy to facilitate a discussion on that and the various issues or gaps which arise at different points. I've attached a copy of Bupa's submission to the Migration Review, which covered a number of these issues.

I've also CC'd my colleague ^{s47F} [REDACTED] here who would be able to facilitate that policy discussion with the key internal contacts.

Kind regards,

^{s47F} [REDACTED]

^{s47F} [REDACTED], Director Public Affairs

Bupa Asia Pacific, 33 Exhibition Street, Melbourne VIC 3000

M ^{s47F} [REDACTED] E ^{s47F} [REDACTED] [@bupa.com.au](mailto:[REDACTED]@bupa.com.au) W bupa.com.au



OFFICIAL

From: ^{s47F} [REDACTED] <^{s47F} [REDACTED] [@bupa.com.au](mailto:[REDACTED]@bupa.com.au)>

Sent: Tuesday, September 16, 2025 5:16 PM

To: ^{s47F, s47E(c)} [REDACTED] <^{s47F, s47E(c)} [REDACTED] [@Health.gov.au](mailto:[REDACTED]@Health.gov.au)>

Cc: ^{s47F, s47E(c)} [REDACTED] <^{s47F, s47E(c)} [REDACTED] [@health.gov.au](mailto:[REDACTED]@health.gov.au)>

Subject: RE: RE: Meeting next week to discuss a Bupa Global Matter [SEC=OFFICIAL]

Hi ^{s47F, s47E(c)} [REDACTED]

Ahead of the Friday discussion, I've located a contact at Bupa UK who will be able to examine the Bupa Global policy issue or connect you with the right internal contact - ^{s47F} [REDACTED] ^{s47F} [REDACTED] [@bupa.com](mailto:[REDACTED]@bupa.com).

I'm advised that in relation to the issue you mentioned below, our approach is that when a customer transfers from Bupa Global to Bupa Australia and we get their previous policy information, we will recognise existing and pre-existing waiting periods served.

This approach is broadly reflective of transfers between various international Bupa Group policies and Bupa Australia, but please note there may be additional nuance in some cases.

Kind regards,

s47F

s47F, Director Public Affairs

Bupa Asia Pacific, 33 Exhibition Street, Melbourne VIC 3000

M s47F E s47F [@bupa.com.au](mailto:s47F@bupa.com.au) W bupa.com.au



From: s47F, s47E(c) <s47F, s47E(c)@Health.gov.au>
Sent: Friday, September 12, 2025 10:18 AM
To: s47F <s47F@bupa.com.au>
Cc: s47F, s47E(c) <s47F, s47E(c)@health.gov.au>
Subject: RE: RE: Meeting next week to discuss a Bupa Global Matter [SEC=OFFICIAL]

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Dear s47F

Thank you for this. The matter concerns a Family Global Policy. The mother resides in Singapore, and s47F
s47F s47F. There was some
discussion about whether s47F should be transferred to a Bupa Australia policy s47F, and
it is unclear whether this occurred.

Unfortunately, I am unable to share further specifics due to privacy reasons at this time. We want to get an understanding of how these matters are generally treated at Bupa and also a contact at the Bupa parent company of the Global Policy, i.e., Bupa Insurance Limited.

Kind regards,

s47F, s47E(c)

Assistant Director – Compliance Section

Private Health Strategy Branch

Australian Government Department of Health, Disability and Ageing

T: s47F, s47E(c) | E: s47F, s47E(c) [@health.gov.au](mailto:s47F, s47E(c)@health.gov.au)

From: s47F <s47F@bupa.com.au>

Sent: Thursday, 11 September 2025 2:17 PM

To: s47F, s47E(c) <s47F, s47E(c)@Health.gov.au>

Cc: s47F, s47E(c) <s47F, s47E(c)@health.gov.au>

Subject: CM: RE: Meeting next week to discuss a Bupa Global Matter [SEC=OFFICIAL]

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Hi s47F, s47E(c),

I'd be happy to discuss this next week. Tuesday afternoon, or Thursday/Friday are good options for me.

Can you provide any background on the query so we can look into the issue?

Kind regards

s47F

s47F, Director Public Affairs

Bupa Asia Pacific, 33 Exhibition Street, Melbourne VIC 3000

M s47F E s47F @bupa.com.au W bupa.com.au



From: s47F, s47E(c) <s47F, s47E(c)@Health.gov.au>
Sent: Thursday, September 11, 2025 2:07 PM
To: s47F <s47F@bupa.com.au>
Cc: s47F, s47E(c) <s47F, s47E(c)@health.gov.au>
Subject: Meeting next week to discuss a Bupa Global Matter [SEC=OFFICIAL]

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Dear s47F

I work in the Private Health Strategy Branch at the Department of Health, Disability, and Ageing, I am reaching out regarding an inquiry about the interaction between a Bupa Global Policy and Bupa Australia. We need to gain a deeper understanding of several aspects of this inquiry, and your expertise would be incredibly valuable.

Would you have time next week to join us for a brief 30-minute meeting to discuss this matter in detail? Your insights and knowledge are crucial for us to address the inquiry accurately and effectively. We would greatly appreciate your time and input.

Thank you for considering our request. I look forward to discussing this with you soon.

Kind regards,

s47F, s47E(c)

Assistant Director – Compliance Section

Private Health Strategy Branch

Australian Government Department of Health, Disability and Ageing

T: [REDACTED] E: [REDACTED] [\[REDACTED\]@health.gov.au](mailto:[REDACTED]@health.gov.au)

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This document has been released
under the Freedom of Information Act 1982
by the Department of Health, Disability and Ageing



A Migration System for Australia's Future

Department of Home Affairs

Bupa Submission

Commercial-in-confidence

This document has been released
under the Freedom of Information Act 1982
by the Department of Health, Disability and Ageing

Contact:

s47F

Director, Public Affairs

Bupa Australia

33 Exhibition Street, Melbourne, 3000

T: s47F E: s47F@bupa.com.au

W: www.bupa.com.au

Commercial in Confidence

Bupa Submission – A Migration System for Australia's Future



About Bupa

Bupa is the largest provider of international health insurance for overseas students and overseas visitors¹ coming to Australia. In the rolling twelve months to July 2022, Bupa had over 356 000 international members. Bupa holds important partnerships with many of Australia's key universities and educational institutions, providing quality cover for students from many countries. Bupa also provides a wide variety of services for millions of customers across Australia and New Zealand. As an aged care provider operating 59 homes across four states, with 7000 team members caring for over 5000 aged care residents, Bupa is one of the largest aged care providers in Australia and a global provider of aged care services. Bupa also provides domestic private health insurance and delivers a range of health care services, including dental (through Bupa Dental), eye care (through Bupa Optical), and health services to ADF members.

Executive Summary

The Department of Home Affairs' review into Australia's migration system provides a timely opportunity to examine the ways in which we can address strategic challenges facing the nation, gaining the economic and social benefits of migration while mitigating the risks that increased migration may impose on community services and infrastructure, including the public health system.

Australia is facing structural challenges such as an ageing population, and a lower ratio of working people to those aged over 65 years. In aged care, there are opportunities to utilise the migration system more effectively to address the critical issue of workforce shortages. As a major employer of more than 14,000 people in Australia, migrants make up a significant portion of Bupa's workforce.

The review must also consider the broader impacts of a larger migration program on Australian society so the nation can be appropriately positioned for its post-Covid economic recovery. This includes consideration of how to mitigate the impacts of increased migration on our health system, including through policy settings that utilise the contribution of private health insurance (PHI).

Bupa believes that a review of these policy settings is necessary to ensure the integrity of the migration program is maintained, while protecting migrants and Australia's public health care system from unnecessary risks relating to health care.

We note that this is a complex area of policy reform, which seeks to balance immigration, social, and health and care policy in a context of fiscal constraints, an ageing population, and increasing expectations and demands on Australia's health and care system.

s47G(1)(b)

¹ Using the most recent APRA data of market share



s47G(1)(b)

The migration system and Australia's health system

Migration provides many economic and social benefits to the Australian community. The Australian health system is a major beneficiary of the migration of skilled health and medical professionals, improving community wellbeing significantly through healthcare provision. However, the review of the migration system must also consider how to protect the public health system from unintended consequences due to some aspects of the management of the migration system.

Public health debt

Bupa believes there is a significant impact to Australia's health system through incurred public health debt that the migration system should address. Overseas visitors who do not hold adequate health insurance, and are not covered by Medicare incur public health debts with the States (and indirectly through shared funding arrangements, the Commonwealth) through lack of payment or inability to pay hospital charges for treatment received.

Various State Government have reported increases in the level of public health debt in recent years. In NSW alone, about 16,000 Medicare-eligible inpatients require hospitalisation each year. In 2019, of the \$100 million invoiced to those patients or their insurers, only about \$70 million was paid, leaving \$30m to be covered by taxpayers. The majority of the costs are for hospital accommodation charges. Other charges include providing prostheses for patients, radiology services and specialist fees. In October 2019, NSW raised at the COAG Health Ministers meeting that health insurance become mandatory across all visa classes.² This has not yet occurred.

² [All overseas visitors should have health cover - News \(nsw.gov.au\)](https://www.nsw.gov.au/news/stories/all-overseas-visitors-should-have-health-cover)



While some of these issues have remained dormant due to pandemic-induced border closures, Australia's return to significant numbers of migrants and visitors increases the risks of rising public health debts at a time of acute resource constraints in the health system, and leaves many visa holders vulnerable to significant financial risks.

Bupa welcomes recent changes to the migration system whereby an existing public health debt of any applicant affects future or subsequent applications (condition 8602), but we believe the Department could be proactive in preventing public health debt from occurring in the first instance and protecting visa holders from incurring significant financial debts.

Inconsistencies in 8501 conditions and the adequate health insurance requirement

The current intent of the Department in its application of 8501 conditions is unclear, and there is no clear rationale for why the condition is applied to certain visa classes and not others, or the circumstances or length of stay for which the adequate health insurance requirement is applied.

In the past, there was a clear demarcation between holding an "Attachment A" policy for a visa subclass and those visas that did not require an Attachment A product for approval.

8501 conditions

The 8501 condition (requiring a Medicare substitute insurance product) is applicable across a range of non-working, multiple entry visas, for individuals in very different circumstances holding visas of varying lengths. There is no clear rationale for applying the requirement to both a person here for four years studying and unable to work, and a person with a 2-month visiting visa. The best example of this would be a Visitor subclass 600 visa, which is a short stay multiple entry visa, and still applies the 8501 condition that exists for Overseas Student visas, replicating Medicare for a stay exceeding four years. This inconsistency creates confusion because cover for this visa condition is not offered across all insurers in the market. We believe there is a missing link between Home Affairs' intent with this condition on certain visas, and the requirements as stated on the department's website. If the 8501 is intended as a Medicare substitute, it should apply equally in circumstances where a Medicare experience is required, or most likely to take place.

New visas introduced to market

It is important that there is clear communication to the private health insurance sector regarding the introduction of new visas and the health insurance requirements. Given that 8501 conditions imply that insurance coverage is widely available in the market, it would be helpful for insurers to be notified when new visas are introduced so that systems and products may be revised to meet the needs of visa holders.

Bupa has become aware of new visas being introduced with no communication from the Department of Home Affairs about these visas or their potential requirements from an insurer perspective. We have recently been made aware of the creation of a skilled working visa (Subclass 476) that allows for 18 months stay without either a minimum health insurance requirement or access to Medicare (8501 condition). This is a significant length of time to be within Australia without mandated access to basic health care services and leads to a higher risk of the visa holder incurring a public health debt.

Bupa has mentioned the above example only to note that the intent of the Subclass 476 visa is not always to allow for a permanent residency pathway, but these types of visa holders may extend, renew or change visa and over time access Permanent Residency. This may have ongoing budgetary impacts and place pressure on the health system and health insurance premiums in the absence of appropriate health insurance cover.



Older Parent Visa

In recent years, the Department of Home Affairs has introduced a new parent visa for applicants over 70 years of age. Unfortunately, Home Affairs neglected to consider the actuarial conclusions associated with an 8501 condition for this cohort, raised in initial consultations. As widely reported in the media³, most families are struggling to take advantage of this new parent visa as there are not many insurance options in the market that meet the adequate health insurance requirement.

Bupa provided a submission to Home Affairs at the time that the new parent visa was being considered (2016), but those concerns have been inadequately addressed in the implementation of the visa class. We believe that greater engagement with insurers prior to the introduction of new visas would avoid similar situations from occurring in future.

Lack of compliance and enforcement undermines the migration system

Bupa is concerned with the lack of sufficient enforcement and compliance of these health insurance conditions by the Department of Home Affairs. The onus is currently placed on insurers in compliance matters, but insurers are often only aware of the type of cover a customer has at the point of claim. From a policy standpoint, even if a customer has not taken out appropriate insurance and never claims, they are still potentially acting in a manner that is inconsistent with their visa conditions.

At the point of visa application, the Department of Home Affairs should be satisfied that the student or visitor has made adequate arrangements in Australia for health insurance during the period of the intended stay, according to the visa requirements. It therefore requires evidence that the applicant has obtained appropriate cover. In practice, it is unclear whether checks are performed to confirm that suitable health insurance has been purchased to meet requirements of certain visa types.

In the case of overseas students where a student obtains OSHC themselves, Home Affairs requires them to provide a copy of their OSHC receipt, or other proof of their OSHC, which shows that the policy will be in effect from the day the student intends to arrive in Australia. Without adequate verification, or confirmation with a student's health insurer, it is possible that the conditions of a visa have already been breached upon arrival, circumventing the intent of the policy. Put simply, it is plausible that someone could be in Australia on an invalid visa and have never contacted a health insurer onshore, with no compliance check having been undertaken to ensure the correct cover was purchased.

Furthermore, when an insurer discovers a known breach of visa conditions (cancellation of a policy, a policy that is not consistent with the visa subclass or failure to renew a policy), there is no robust means of communicating these breaches to Home Affairs. If a customer cancels a policy and is left without cover in Australia, they may be in breach of their visa conditions. There should be a way for stakeholders to communicate these risks and breaches back to the Department of Home Affairs to be acted upon.

The lack of connection between insurers and Home Affairs regarding international visitors is problematic and potentially allows for fraud and further public health debt risks. Bupa would be available to discuss this further with the Department.

Gaps between overseas student arrivals and start dates

Intending overseas students to Australia are sometimes found to be in a 'catch 22' situation which does not serve the migration system well and can potentially lead to issues with compliance and non-coverage. On one hand, in order to apply for and be granted a visa, an intending student's Overseas

³ [Families desperate to find 'adequate' health cover for visitor visa holders 70 and over | SBS Punjabi](#)



Student Health Cover (OSHC) must be arranged to start from the day they will arrive in Australia. On the other hand, students cannot make travel arrangements, and therefore cannot know their exact arrival date – i.e., the day their OSHC must start – until the Department of Home Affairs grants their visa.

In practice it appears that education providers routinely use the course start date as a 'proxy' for the OSHC start date, or a date is guessed/estimated by the customer. However, students usually arrive prior to the day their course starts. This creates a gap between the student's actual arrival and the start of their OSHC policy.

Bupa is aware that some insurers choose to backdate the OSHC start date to the student's arrival date. This ensures the students are covered for any medical expenses from their first day in Australia. However, this practice relies on the insurers' goodwill, and may not be uniform across all insurance providers. It also relies on the insurers becoming aware of the gap in individual cases.

Bupa recommends that the Department of Home Affairs adopt a previous recommendation from the Ombudsman in 2014 that found:

"a possible solution would be for DIBP [now the Department of Home Affairs] to contact students whose data indicates that there is a gap between their OSHC start date and their actual arrival date, to advise the students that they are in breach of their visa condition and need to contact their OSHC insurance provider to adjust their OSHC start date to rectify this"⁴

As Bupa does not have access to customs data relating to entry in Australia (passport information) there would be no way for Funds to access this information and proactively contact customers on arrival in Australia ensuring adequate coverage.

The role of migration in building the aged care workforce

Aged care workforce shortages

The migration system has a powerful role to play in addressing the workforce shortages facing aged care, and the broader care and support sector in Australia. Bupa is pleased to see the review considering the way the migration system can be used to meet the challenges facing Australia. Our nation's changing demographics brings with it the challenges of an ageing population, a lower ratio of working-age people to those over 65⁵ and an urgent need to build our care and support workforce.

The Committee for the Economic Development of Australia (CEDA) has projected an annual shortfall of 30,000 to 35,000 direct care workers over the coming decade⁶. It is a challenge that must be addressed immediately if the sector is to properly respond to the recommendations of the Royal Commission into Aged Care Quality and Safety and meet basic standards of care expected by all Australians.

Under current migration policy settings, personal care workers cannot be recruited via temporary or permanent skilled migration lists, with most of the migrant workforce coming on a working holiday, student, or family visa. It is important that a pathway to permanent residency be offered to make Australia an attractive place to work and avoid possible exploitation. Proposals to lift the Temporary

⁴ [Issues Paper Overseas Student Health Cover \(ombudsman.gov.au\)](https://www.ombudsman.gov.au/Issues-Paper-Overseas-Student-Health-Cover)

⁵ [Treasury, 2021 Intergenerational Report](#)

⁶ [CEDA, Duty of Care](#)



Skilled Migration Income Threshold (TSMIT) would also exclude aged care roles forecast to be in significant shortage over the next decade. Consideration must be given to an appropriate threshold, and criteria for exceptions to be made.

The migration system also suffers from processes that are unnecessarily time consuming and not fit-for-purpose, resulting in a poor experience of the immigration process for migrants and diminishing Australia's attractiveness as a destination to work. Our experience suggests that the market testing requirements are complex and prohibitive, leading to delays (usually over 28 days) without adding value despite obvious workforce challenges. Additionally, some settings lack a clear rationale and disincentivise the use of the migration system – for example, eligibility for Designated Area Migration Agreements can be very limited, with the exclusion of many remote or regional locations from the program, while rejecting some occupations where there are widespread skills shortages. We recommend that, given the workforce shortages acknowledged by the National Skills Commission⁷, aged care providers should be more empowered to sponsor workers to meet expected standards of care without having to undergo lengthy and complex application processes.

An Essential Skills Visa

Bupa is supportive of CEDA's recommendation for an Essential Skills Visa to be established, allowing aged care providers to access personal care workers and other hard-to-fill roles through expanded visa options. This option should include a pathway to permanent residency, making Australia an attractive place to work and mitigate against the risks of exploitation. Under this visa, intensive and low-value processes such as labour market testing in occupations with severe shortages should be removed to streamline the process and improve the experience both for employers and for migrants.

The increasing role of registered nurses in aged care should also lead to a reassessment of migration numbers in this profession, allowing the sector to meet the requirement for a registered nurse to be on site 24/7 in a residential aged care facility.

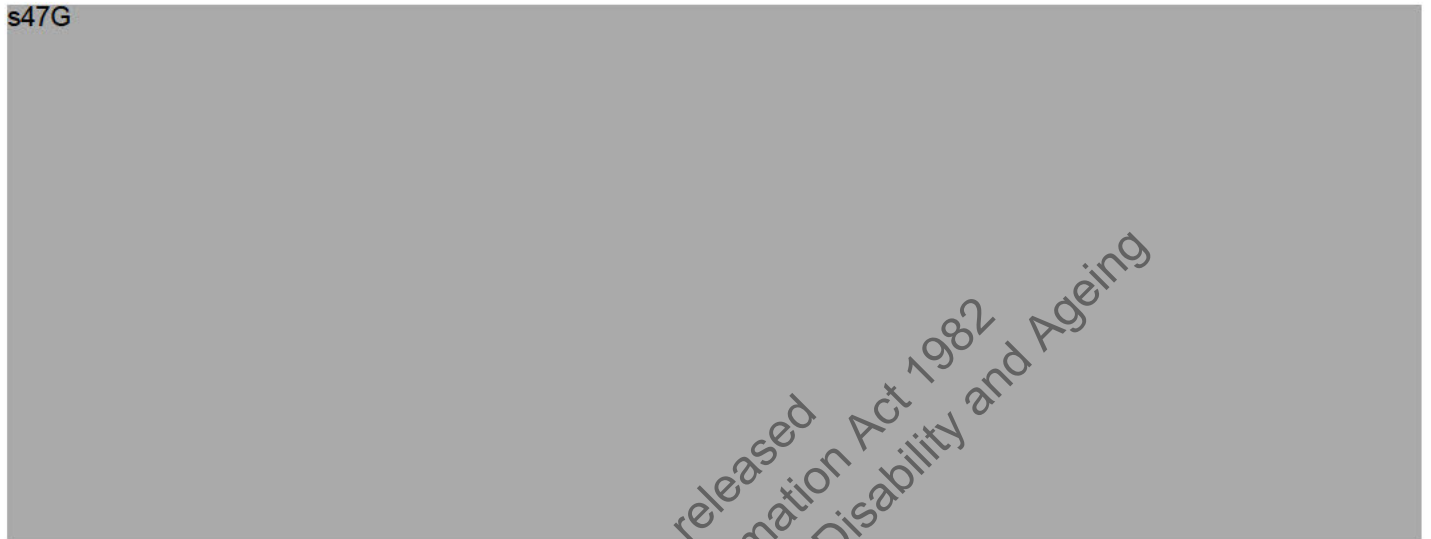
⁷ [National Skills Commission, 2022 Skills Priority List](#)

From: s47F, s47E(c)
Sent: Friday, 19 September 2025 10:46 AM
To: s47F, s47E(c); s47F, s47E(c)
Subject: Meeting with s47F from Bupa about Bupa Global issue [SEC=OFFICIAL]

Hi s47F, s47E(c)

Here is a short summary of the meeting s47F and I just had now with s47F from Bupa:

s47G



I'll save this email and my original notes from the meeting to the relevant TRIM folder.

Kind regards

s47F,
s47E(c)

This document has been released
under the Freedom of Information Act 1982
by the Department of Health, Disability and Ageing

From: [REDACTED]
Sent: Friday, 19 September 2025 10:31 AM
To: [REDACTED]
Subject: Meeting with [REDACTED] from Bupa about Bupa Global issue [SEC=OFFICIAL]

Bupa Global Company
Bupa Group

s47G

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under the Freedom of Information Act 1982
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by the Department of Health, Disability and Ageing

This document has been released
under the Freedom of Information Act 1982
by the Department of Health, Disability and Ageing

OFFICIAL

From: s47F <s47F@bupa.com.au>
Sent: Tuesday, 16 September 2025 5:17 PM
To: s47F, s47E(c) <s47F, s47E(c)@Health.gov.au>
Cc: s47F, s47E(c) <s47F, s47E(c)@health.gov.au>
Subject: RE: RE: Meeting next week to discuss a Bupa Global Matter [SEC=OFFICIAL]

Hi s47F,
s47E(c)

Ahead of the Friday discussion, I've located a contact at Bupa UK who will be able to examine the Bupa Global policy issue or connect you with the right internal contact - s47F s47F @bupa.com.

I'm advised that in relation to the issue you mentioned below, our approach is that when a customer transfers from Bupa Global to Bupa Australia and we get their previous policy information, we will recognise existing and pre-existing waiting periods served.

This approach is broadly reflective of transfers between various international Bupa Group policies and Bupa Australia, but please note there may be additional nuance in some cases.

Kind regards,

s47F

s47F, Director Public Affairs
Bupa Asia Pacific, 33 Exhibition Street, Melbourne VIC 3000
M s47F E s47F @bupa.com.au W bupa.com.au



From: s47F, s47E(c) <s47F, s47E(c)@Health.gov.au>
Sent: Friday, September 12, 2025 10:18 AM
To: s47F <s47F@bupa.com.au>
Cc: s47F, s47E(c) <s47F, s47E(c)@health.gov.au>
Subject: RE: RE: Meeting next week to discuss a Bupa Global Matter [SEC=OFFICIAL]

Stop. Verify. Protect. Is this email safe? If in doubt, **report it**. You'll be notified within minutes if it's safe to continue, or if it's a malicious attack.

Dear s47F

Thank you for this. The matter concerns a Family Global Policy. The mother resides in Singapore, and s47F. There was some discussion about whether s47F should be transferred to a Bupa Australia policy when s47F, and it is unclear whether this occurred.

Unfortunately, I am unable to share further specifics due to privacy reasons at this time. We want to get an understanding of how these matters are generally treated at Bupa and also a contact at the Bupa parent company of the Global Policy, i.e., Bupa Insurance Limited.

Kind regards,

s47F, s47E(c)
Assistant Director – Compliance Section
Private Health Strategy Branch

Australian Government Department of Health, Disability and Ageing
T: s47F, s47E(c) | E: s47F, s47E(c) @health.gov.au

From: s47F <s47F@bupa.com.au>
Sent: Thursday, 11 September 2025 2:17 PM
To: s47F, s47E(c) <s47F, s47E(c)@Health.gov.au>
Cc: s47F, s47E(c) <s47F, s47E(c)@health.gov.au>
Subject: CM: RE: Meeting next week to discuss a Bupa Global Matter [SEC=OFFICIAL]

REMINDER: Think before you click! This email originated from outside our organisation. Only click links or open attachments if you recognise the sender and know the content is safe.

Hi s47F, s47E(c)

I'd be happy to discuss this next week. Tuesday afternoon, or Thursday/Friday are good options for me.

Can you provide any background on the query so we can look into the issue?

Kind regards

s47F

s47F, Director Public Affairs
Bupa Asia Pacific, 33 Exhibition Street, Melbourne VIC 3000
M s47F E s47F <s47F@bupa.com.au> W bupa.com.au



From: s47F, s47E(c) <s47F, s47E(c)@Health.gov.au>
Sent: Thursday, September 11, 2025 2:07 PM
To: s47F <s47F@bupa.com.au>
Cc: s47F, s47E(c) <s47F, s47E(c)@health.gov.au>
Subject: Meeting next week to discuss a Bupa Global Matter [SEC=OFFICIAL]

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Dear s47F

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Would you have time next week to join us for a brief 30-minute meeting to discuss this matter in detail? Your insights and knowledge are crucial for us to address the inquiry accurately and effectively. We would greatly appreciate your time and input.

Thank you for considering our request. I look forward to discussing this with you soon.

Kind regards,

s47F, s47E(c)

Assistant Director – Compliance Section

Australian Government Department of Health, Disability and Ageing

T: s47F, s47E(c) | E: s47F, s47E(c) [@health.gov.au](mailto:s47F, s47E(c)@health.gov.au)

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Kind regards,

s47F

s47F, Director Public Affairs
Bupa Asia Pacific, 33 Exhibition Street, Melbourne VIC 3000
M s47F E s47F @bupa.com.au W bupa.com.au


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To: s47F <s47F@bupa.com.au>
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Kind regards,

s47F, s47E(c)

Assistant Director – Compliance Section
Private Health Strategy Branch

Australian Government Department of Health, Disability and Ageing

T: s47F, s47E(c) | E: s47F, s47E(c) [@health.gov.au](mailto:s47F, s47E(c)@health.gov.au)

From: s47F <s47F@bupa.com.au>

Sent: Thursday, 11 September 2025 2:17 PM

To: s47F, s47E(c) <s47F, s47E(c)@Health.gov.au>

Cc: s47F, s47E(c) <s47F, s47E(c)r@health.gov.au>

Subject: CM: RE: Meeting next week to discuss a Bupa Global Matter [SEC=OFFICIAL]

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s47F

s47F, Director Public Affairs

Bupa Asia Pacific, 33 Exhibition Street, Melbourne VIC 3000

M s47F E s47F [@bupa.com.au](mailto:s47F@bupa.com.au) [W bupa.com.au](http://bupa.com.au)



From: s47F, s47E(c) <s47F, s47E(c)@Health.gov.au>

Sent: Thursday, September 11, 2025 2:07 PM

To: s47F <s47F@bupa.com.au>

Cc: s47F, s47E(c) <s47F, s47E(c)@health.gov.au>

Subject: Meeting next week to discuss a Bupa Global Matter [SEC=OFFICIAL]

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s47F, s47E(c)

Assistant Director – Compliance Section
Private Health Strategy Branch

Australian Government Department of Health, Disability and Ageing

T: s47F, s47E(c) | E: s47F, s47E(c) [@health.gov.au](mailto:s47F, s47E(c)@health.gov.au)

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s47F, Director Public Affairs
Bupa Asia Pacific, 33 Exhibition Street, Melbourne VIC 3000
M s47F E s47F @bupa.com.au W bupa.com.au


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Sent: Thursday, September 11, 2025 2:07 PM
To: s47F <s47F@bupa.com.au>
Cc: s47F, s47E(c) <s47F, s47E(c)@health.gov.au>
Subject: Meeting next week to discuss a Bupa Global Matter [SEC=OFFICIAL]

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s47F, s47E(c)

Assistant Director – Compliance Section
Private Health Strategy Branch

Australian Government Department of Health, Disability and Ageing

T: s47F, s47E(c) | E: s47F, s47E(c) [@health.gov.au](mailto:s47F, s47E(c)@health.gov.au)

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by the Department of Health, Disability and Ageing

s47F, s47E(c)

From: FOI
Sent: Monday, 1 June 2026 11:14 AM
To: MCBRIDE, Paul
Cc: s47F, s47E(c)
Subject: FOI 26-2991 - Third party responses and further instructions [SEC=OFFICIAL]
Attachments: FOI 26-2991 - Third Party Consultation Pack - Bupa Global Redactions applied 29.5.26.pdf; RE: Courtesy consultation Freedom of Information access request FOI 26-2991 [SEC=OFFICIAL:Sensitive, ACCESS=Personal-Privacy]; RE: Freedom of Information Request 26-2991 - Opportunity to make a submission - Bupa Asia Pacific [SEC=OFFICIAL]; CM: RE: Department of Health, Disability and Ageing FOI 26-2991 – Courtesy Consultation [SEC=OFFICIAL:Sensitive, ACCESS=Personal-Privacy]

OFFICIAL

Hi Paul and s47F, s47E(c)

I have now received all the third-party consultation responses for s11C(1)(a)'s access request.

Please see responses from:

- **Bupa Global** – below and attached – seeking redactions of staff names/personal information
- **Bupa Asia Pacific** – attached – seeking redaction of business information and staff names/personal information (they have used the wrong FOI Act, but the intent is clear)
- **APRA** – attached – seeking redaction of staff names
- **ACCC** – attached – nil objections.

Next steps

I now seek your instructions on the FOI access decision to be drafted. Please review the submissions provided and advise if you agree with the proposed exemptions. I will then draft the decision pack for your review and approval.

Timeframes

This request is due on Monday 15 June 2026. However, given the public holiday next week, it would be appreciated if you could please respond with your instructions by no later than **COB Friday 5 June 2026** (earlier would be much appreciated though!).

Happy to discuss this week if you have any questions.

Kind regards

s47F, s47E(c)

**Director – Freedom of Information
Commercial and Information Law**

Legal Division | Corporate Operations Group

Australian Government Department of Health, Disability and Ageing

T: [REDACTED] | E: foi@health.gov.au

This email comes to you from Boonwurrung country

Location: Melbourne

PO Box 9848, Canberra ACT 2601, Australia

The Department of Health, Disability and Ageing acknowledges First Nations peoples as the Traditional Owners of Country throughout Australia, and their continuing connection to land, sea and community. We pay our respects to them and their cultures, and to all Elders both past and present.

Please note that this email and attachments may contain confidential or legally privileged information. Please consult with Legal Division before disclosing any part of this email, or attachment, outside the Department. If you receive this email in error, please delete it and contact the sender immediately.

OFFICIAL

From: [REDACTED] <[REDACTED]@bupa.com>

Sent: Saturday, 30 May 2026 1:40 AM

To: FOI <FOI@health.gov.au>

Subject: Re: Freedom of Information Request 26-2991 - Opportunity to make a submission - Bupa Global [SEC=OFFICIAL]

REMINDER: Think before you click! This email originated from outside our organisation. Only click links or open attachments if you recognise the sender and know the content is safe.

Dear [REDACTED],

Thank you for providing us with the opportunity to make a submission regarding FOI Request 26-2991. Please find our submission attached for your review.

Bupa considers that the disclosure of names and other identifying details of individuals would constitute an unreasonable disclosure of personal information under section 47F of the FOI Act. We would like to highlight that the identity of the FOI applicant has not been disclosed to Bupa, and therefore, no reliance can be placed on any assumption that the applicant is already aware of, or has a particular interest in, the individuals identified in the documents. Additionally, such disclosure is not necessary for understanding the substance of the material provided.

We appreciate your consideration of these points as you review the documents in scope. If you require any further information or clarification, please do not hesitate to reach out.

Kind regards

[REDACTED],

Director of Global Operations and Healthcare Management.
Bupa Global.

Tel +44 [REDACTED]

EA – [REDACTED].

Time sensitive messages work better on Teams!

From: FOI <FOI@health.gov.au>

Sent: 21 May 2026 05:05

To: s47F <s47F@bupa.com>

Cc: FOI <FOI@health.gov.au>

Subject: Freedom of Information Request 26-2991 - Opportunity to make a submission - Bupa Global [SEC=OFFICIAL]

You don't often get email from foi@health.gov.au. Learn why this is important

Please be aware. This email originated from outside Bupa. Do not click on links or open attachments unless you recognise the sender and know the content is safe.

OFFICIAL

Dear Mr s47F,

The Department of Health, Disability and Ageing (the department) has received a request seeking access to the following under the *Freedom of Information Act 1982* (Cth) (FOI Act) relating to Bupa Global.

Please note that we are consulting Bupa Asia Pacific separately (via s47F [REDACTED]).

Documents captured in scope

The attached documents were captured within the scope of the applicant's request and include personal and/or business affairs information.

Under sections 27 and 27A of the FOI Act, where the department receives a request for access to documents containing 'business information' and/or 'personal information' and the department believes the relevant organisation and/or individual may wish to contend information within the documents is exempt from release, the department is required to consult the relevant organisation and/or individual before making a decision to release that information.

Please note, the documents provided to you by the department in relation to this FOI request are not a reflection of the department's views in relation to exempt material.

For your action

We are now providing you with the opportunity to advise the department if you have any concerns with your information being released to the applicant under the FOI Act.

By providing submissions to the department, you will be informing the decision maker of your stance on the release of the information relating to Bupa Global.

Please provide any comments you may have by **Friday 29 May 2026**. If you require further time for review, please let me know.

Should you choose not to respond by this date, the decision maker will consider you have no objections to the release of the relevant documents and will proceed to make a decision on access to the documents.

Relevant grounds of exemption

The relevant grounds of exemption are:

Section 47 – Documents disclosing trade secrets or commercially valuable information.

- Documents are exempt if release would disclose trade secrets or information having a commercial value that would be, or could reasonably be expected to be, destroyed or diminished if the information were disclosed.

Section 47F – Personal privacy (public interest conditional exemption).

- Documents are conditionally exempt if disclosure would involve the unreasonable disclosure of personal information about any person (including a deceased person). In deciding whether disclosure would be unreasonable, the decision maker will also consider the extent to which the information is well known, whether the relevant individual is known to be (or to have been) associated with the matters dealt within the document, the availability of the information from publicly accessible sources and any other matters that the decision maker considers relevant. Note: This exemption is only available if, in addition to the above details, it can be demonstrated that granting access would be, on balance, contrary to the public interest.

Section 47G – Business (public interest conditional exemption).

- Documents are conditionally exempt if disclosure would disclose information concerning a person in respect of his or her business or professional affairs or concerning the business, commercial or financial affairs of an organisation or undertaking would, or could reasonably be expected to, unreasonably affect that person adversely in respect of his or her lawful business or professional affairs or that organisation or undertaking in respect of its lawful business, commercial or financial affairs. Note: This exemption is only available if, in addition to the above details, it can be demonstrated that granting access would be, on balance, contrary to the public interest.

Third party review rights

If the department decides after consultation with you to grant access contrary to your submissions, you will be notified of your right to seek an internal or Information Commissioner review of the decision to grant access.

Further information on third party review rights can be found at <https://www.oaic.gov.au/freedom-of-information/guidance-and-advice/personal-and-business-information-third-party-review-rights/>.

Disclosure log

You should be aware, if the department decides to grant access to the documents, or parts thereof, it is a requirement that they be published on the department's FOI [Disclosure Log](#), unless one of the exceptions in s11C of the FOI Act apply. If you consider it would be unreasonable for some or all of the documents to be published, please indicate this in your response. A Disclosure Log decision is not reviewable, but the department would take your views into account.

Applicant's review rights

The FOI applicant has rights of review under the FOI Act. These include external review by the Australian Information Commissioner and the Administrative Appeals Tribunal. If the decision is to exempt any material in accordance with any submission you may make, your submission may be required to be given to the external reviewer.

Provisions of the FOI Act

The relevant provisions of the FOI Act can be found at www.legislation.gov.au/Series/C2004A02562. In addition, further guidance about the FOI Act can be found at [FOI Guidelines](#).

Contacts

If you require clarification of any of the matters discussed in this email, please do not hesitate to contact us on the details below.

Kind regards

s47F, s47E(c)

Director – Freedom of Information Commercial and Information Law

Legal Division | Corporate Operations Group

Australian Government Department of Health, Disability and Ageing

T: s47F, s47E(c) E: foi@health.gov.au

This email comes to you from Boonwurrung country

Location: Melbourne

PO Box 9848, Canberra ACT 2601, Australia

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For UK insurance policyholders:

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For EEA insurance policyholders:

Bupa Global Designated Activity Company (Bupa Global DAC), trading as Bupa Global, is a designated activity company limited by shares registered in Ireland under company number 623889 and having its registered office at Second Floor, 10 Pembroke Place, Ballsbridge, Dublin 4, Bupa Global DAC, trading as Bupa Global is regulated by the Central Bank of Ireland.

Directors: M. Potkins (British), J. O'Reilly (British), G. Beasley, M. Fulton, S. Brown (British), R. Pearson (British) and D. Swanton.

For a list of Bupa's main UK trading companies visit www.bupa.co.uk

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16 December 2025

BY EMAIL

██████████
Assistant Secretary
Private Health Strategy Branch
Department of Health, Disability and Ageing

Dear ██████████

Re Bupa Global paying hospital benefits to an Australian resident

We refer to your letter received 27 October 2025 in which you have raised concerns about Bupa Global's compliance with Australian law in relation to its international private medical insurance (IPMI) business.

We have set out our response to your concerns below. If you would like to discuss our response, we would be happy to arrange a meeting with you.

Background

The Department has received a complaint from ██████████ who is insured under a Bupa Global IPMI policy. You have told us that he is a Medicare eligible person. Bupa Global paid hospital benefits for ██████████ when he was hospitalised in Australia on 18 February 2025.

██████████ IPMI policy was issued in 2003 by International Health Insurance Danmark A/S, which was later acquired by Bupa Global. ██████████ has been covered under this policy since his birth in ██████████. ██████████ had been listed as a resident of Singapore (where the main policyholder, ██████████'s mother, currently resides). Bupa Global was notified by ██████████'s broker in December 2024 that ██████████'s residency had changed to Australia.

Bupa Insurance Limited (trading as Bupa Global) is a company registered in the United Kingdom and headquartered in London, United Kingdom. Bupa Insurance Limited conducts the business of providing IPMI (under which ██████████ is covered) from the United Kingdom. Bupa Insurance Limited has no offices, assets, infrastructure, IT systems or staff in Australia or any subsidiary companies operating in Australia.

Bupa Insurance Limited issues IPMI policies to persons residing outside of Australia to cover medical treatment received in a range of countries including in Australia. Bupa Insurance Limited does not market or sell IPMI policies in Australia and does not engage any third party to market or sell IPMI policies in Australia.

A person insured under Bupa Insurance Limited's IPMI policies is required to notify it of any changes to their residency. Where Bupa Insurance Limited is notified that an insured person changes their residency to Australia, Bupa Insurance Limited will continue to cover the person if they are a dependant and the main policyholder continues to reside outside of Australia.

You have expressed concern that Bupa Insurance Limited is not complying with Australian law for two reasons:

- it is carrying on a health insurance business in breach of the PHIPS Act because it is not registered as a health insurer; and
- it is funding a service where a Medicare benefit is payable in breach of the HI Act.

We have set out below why Bupa Insurance Limited does not consider that it has breached either the PHIPS Act or the HI Act (as those terms are defined in your letter).

Carrying on health insurance business in Australia

Bupa Insurance Limited issues and manages the IPMI policies and pays benefits to insured persons from its headquarters in the United Kingdom, including [REDACTED]'s IPMI policy. The receipt of medical treatment in Australia triggers a liability under the IPMI policy which is paid by Bupa Insurance Limited from the United Kingdom (in a similar way to travel insurance).

Under the PHIPS Act, a person commits an offence if they carry on health insurance business in Australia without being registered under the PHIPS Act as a private health insurer. Bupa Insurance Limited's IPMI business is not being carried on in Australia and there is no provision in the PHIPS Act that provides for the application of that Act outside of Australia (other than Norfolk Island).

Bupa Insurance Limited is not an Australian company. It does not have a place of business in Australia or any business operations in Australia. Bupa Insurance Limited's IPMI business is being carried on from the United Kingdom.

Bupa Insurance Limited previously sold IPMI policies to Australian residents to cover for medical treatment received outside of Australia, through a distribution arrangement with Insurance Australia Limited (IAL), who was the holder of an Australian Financial Services Licence. This arrangement ceased in 2023 and since that time there is no arrangement with Bupa Insurance Limited where cover is issued in Australia. Please note that the reference to 'IPMI policies' in this letter does not apply to these policies but to the IPMI policies sold outside of Australia for cover for medical treatment in various countries including Australia.

For these reasons, Bupa Insurance Limited is not required to be registered as a health insurer under the PHIPS Act.

Coverage for Medicare eligible services

You have noted that Bupa Insurance Limited cannot fund a service where Medicare benefits are payable under the HI Act. Section 126 of the HI Act prohibits any person from *making a contract of insurance* that covers Medicare eligible services. The HI Act does not extend the application of the HI Act outside of Australia (other than in specified territories such as Norfolk Island) which means the making of the contract of insurance must occur in Australia. The funding of Medicare-eligible services in of itself is not an offence under the HI Act.

While we acknowledge that Bupa Insurance Limited may cover Medicare eligible services under its IPMI policies, it has not made a contract of insurance in Australia. Insured persons apply for the IPMI policies outside of Australia and a contract of insurance is made when Bupa Insurance Limited accepts those applications which also occurs outside of Australia.

Further, Bupa Insurance Limited does not have access to a person's Medicare eligibility details.

Notification to Australian residents

Bupa Insurance Limited requires that insured persons provide notice of any changes to their residency. When this occurs, Bupa Insurance Limited has processes in place to help address any implications of this change.

When Bupa Insurance Limited is notified that a dependant has moved to Australia, our internal sales rules reflect that the following disclosures should be made to the relevant insured, their relevant broker and/or the relevant dependant:

- Bupa Insurance Limited's policies do not meet Australian government requirements to comply with the health insurance condition attached to some visas and that they should seek independent advice; and
- Bupa Insurance Limited's policies do not comply with Australian private health insurance regulatory requirements and therefore do not qualify for the Medicare Levy Surcharge (MLS) exemption. We also notify the insured person that they should consider obtaining a compliant Australian private health insurance policy to avoid the MLS or assess the implications of holding dual cover if they wish to retain their Bupa Insurance Limited IPMI policy.

According to our records, this process was followed in relation to [REDACTED]. Bupa Insurance Limited received a notice from [REDACTED]'s broker in December 2024 that [REDACTED] had moved to Australia. In accordance with our processes, we informed the broker of the above matters including that he would not qualify for the MLS exemption by holding the Bupa Insurance Limited IPMI policy, and instructed the broker to ensure [REDACTED] was made aware of this.

Extent of policies where dependants are residing in Australia

As mentioned above, these policies were purchased outside Australia and are managed by Bupa Insurance Limited outside of Australia. Given this and the above explanation, our view is that there has been no breach of the HI Act or the PHIPs Act. Therefore, we do not believe this is an issue nor requires any remediation.

We trust that this addresses your concerns and reiterate that, if you would like, we would be happy to meet to discuss this matter.

Yours sincerely

s47F



s47F

Director of Global Operations and Healthcare Management
Bupa Global

From: [REDACTED]@bupa.com>
Sent: Tuesday, 16 December 2025 7:15 PM
To: [REDACTED]
Cc: [REDACTED]; [REDACTED]; s47F [REDACTED]
Subject: Bupa Global paying hospital benefits to an Australian resident
Attachments: Response Letter to DoH Australia FINAL.pdf

REMINDER: Think before you click! This email originated from outside our organisation. Only click links or open attachments if you recognise the sender and know the content is safe.

Good morning

Please find attached letter in relation to the above matter.

Kind regards

For and on behalf of [REDACTED]
Bupa Global

[REDACTED] (she/her)
EA to [REDACTED] General Manager, UK & Africa
Bupa Global, 1 Angel Court, London, EC2R 7HJ
M +44 [REDACTED] E [REDACTED]@bupa.com W www.bupa.com

Visit www.bupa.com for the story of who we are, where we've come from and what we do.

For UK insurance policyholders:

Bupa Insurance Limited registered in England under company number 03956433 and having its registered office at 1 Angel Court, London EC2R 7HJ is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority. The Financial Conduct Authority only regulates the financial services activities of Bupa Insurance Limited that take place in the UK. Bupa Insurance Services Limited registered in England under company number 03829851 and having its registered office at 1 Angel Court, London EC2R 7HJ is authorised and regulated by the Financial Conduct Authority. Bupa Global is a trading name of Bupa Insurance Limited and Bupa Insurance Services Limited which are registered in England and Wales.

For EEA insurance policyholders:

Bupa Global Designated Activity Company (Bupa Global DAC), trading as Bupa Global, is a designated activity company limited by shares registered in Ireland under company number 623889 and having its registered office at Second Floor, 10 Pembroke Place, Ballsbridge, Dublin 4, Bupa Global DAC, trading as Bupa Global is regulated by the Central Bank of Ireland.

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