

# Submission CMAE2500904

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## Submission

**What are you reporting to the CMA?**

A problem with a business

**Tell us about the businesses involved**

Royal College of General Practitioners  
30 Euston Square  
London  
NW1 2FB  
[www.rcgp.org.uk](http://www.rcgp.org.uk)  
Egton Medical Information Systems Ltd  
Fulford Grange  
Rawdon  
Leeds  
LS19 6BA  
[www.emishealth.com](http://www.emishealth.com)  
EMIS Group Limited  
Fulford Grange  
Rawdon  
Leeds  
LS19 6BA  
Unitedhealth Group Incorporated  
1 Health Drive  
Minnesota

**Tell us what happened**

The Royal College of General Practitioners (RCGP) requires all UK GP trainees (over 3,500 annually) to use a single commercial portfolio platform, FourteenFish, to record their training and CPD. Access to this platform costs £963 over a standard three-year training period (or more if the trainee opts for full RCGP membership). No alternative platform is permitted, even if it meets the same educational and technical requirements. Payment of this fee is effectively mandatory for trainees to complete training and gain certification.

In correspondence with the RCGP (copies of which I will upload to this submission), the RCGP confirmed that FourteenFish is the “only platform currently approved” for GP training. The stated reason is “integration with other systems and roles involved in the training process.” No further details have been provided regarding how this supplier was selected,

whether any open procurement or competitive tender took place, or whether alternatives were considered. There is no published technical specification or open interface that would allow other providers to compete.

This arrangement creates a closed market where all trainees are compelled to pay a fixed fee to a single supplier in order to fulfil training requirements. FourteenFish is a private platform owned by UnitedHealth, a US-based healthcare organisation. Based on trainee numbers and current pricing, this generates revenue of at least £3 million per year from trainees, with no competitive pressure on pricing or service standards.

The concern is that the RCGP is using its position as the gatekeeper of GP training portfolio approval to mandate the use of a single, paid-for platform, excluding all competition. This appears to constitute an abuse of a dominant position in the market for GP training portfolio services.

The key points of concern are:

1. RCGP mandates the use of FourteenFish, with no option to use other platforms, regardless of equivalence.
2. The fee of £963 is compulsory and unfunded, creating a significant financial burden for trainees.
3. No evidence of fair procurement or open competition has been presented.
4. The justification of “integration” is not credible as a barrier to competition; integration could be implemented across multiple platforms if a fair process allowed.

I am submitting this complaint for review by the CMA as the arrangement prevents competition, creates a monopoly-like environment, and forces a captive group of trainees to purchase a single, expensive product as a condition of progressing through medical training.

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**Where in the UK are you reporting from?**

Scotland

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## Upload supporting evidence

Correspondence with RCGP - rmacd.com.pdf

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## Contact information

**First name**

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Telephone number                

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