2. Summary of the self-assessment plan

2.1. Information about the service provider

Service provider: Suomen Terveystalo Oy
Address: Jaakonkatu 3 B, 3rd floor, 00100 Helsinki
Tel. +358 30 633 11
Fax +358 30 633 1602
Business ID 1093863-3

Service provider: Terveystalo Julkiset Palvelut Oy
Address: Porkkalankatu 22 C, 3rd floor. 00180 Helsinki
Tel. +358 30 633 11
Fax +358 30 633 1602
Business ID 1625174-4

Service provider: Terveystalo Kuntaturva Oy
Address: Porkkalankatu 22 C, 3rd floor. 00180 Helsinki
Tel. +358 30 633 11
Fax +358 30 633 1602
Business ID 2865363-6

Petri Bono, Chief Medical Officer (Adjunct Professor, specialist in oncology), is responsible for the health care services of Suomen Terveystalo Oy, address: Jaakonkatu 3 B, 3rd floor, 00100 Helsinki, e-mail: petri.bono@terveystalo.com, tel. +358 50 427 0943.

Tanja Ketola-Kinnula, Chief Dental Officer (Oral and Maxillofacial Surgeon, MD), is responsible for oral health services Suomen Terveystalo Oy, address: Jaakonkatu 3 B, 3rd floor, 00100 Helsinki, e-mail: tanja.ketola-kinnula@terveystalo.com, tel. +358 50 5527814.

Unto Palonen, Chief Occupational Health Physician (Specialist in Occupational Health Care), is responsible for occupational health services at Suomen Terveystalo Oy, address: Jaakonkatu 3 B, 3rd floor, 00100 Helsinki, e-mail: unto.palonen@terveystalo.com, tel. +358 40 8266 170.

Jarmo Kantonen, Chief Physician (MD, specialist in acute medicine and general medicine, special competence in addiction medicine), is responsible for the public services at Terveystalo Julkiset Palvelut Oy and Terveystalo Kuntaturva Oy, address: Porkkalankatu 22 C, 3rd floor, 00180 Helsinki, e-mail: jarmo.kantonen@terveystalo.com, with the exception of units with unit-specific authorizations.

Helena Kovari, Chief Dental Officer (Dental Care Specialist) is responsible for the oral health services of Terveystalo Julkiset Palvelut Oy, address: Technopolis, Kalevantie 2, 33100 Tampere, e-mail: helena.kovari@terveystalo.com, tel. +358 40 088 2392.

Clinic addresses and contact information as well as the validity of microbiology licenses can be found in the location and license register and at the register of Suomen Terveystalo Oy, Terveystalo Julkiset Palvelut Oy and Terveystalo Kuntaturva Oy.

2.2. Business idea, values, and principles

Terveystalo operates in approximately 100 cities, and the national network includes approximately 180 clinics, 20 clinic-hospitals and 45 dental clinics. The clinic network is complemented by 24/7 digital services. Around half of Terveystalo’s 12,500 health care professionals are employees of Terveystalo, while the other half are independent practitioners. In 2018, Terveystalo had approximately 1.2 million
individual customers. There were more than 3.5 million physician visits, which amounts to 15% of the total annual physician visits in Finland.

Terveystalo’s mission: We are fighting for a healthier life.

Terveystalo’s vision: Your first choice – the leader in health care services.

Our values: Expertise and caring.

2.3. Organization and management of self-assessment

The managers responsible for health care services at Terveystalo ensure that the provided health care services comply with the requirements set by law, decrees and regulations.

The Chief Medical Officer leads the Medical Forum that discusses significant medical issues that require policy setting. The Chief Dental Officer represents oral health services in the Medical Forum and the Chief Occupational Health Physician represents occupational health services. The medical management is responsible for the compliance of the operations, medical content of services, monitoring of treatment effectiveness and patient safety. In addition, the company has described an organizational structure for commercial and operative management. The up-to-date version is available in the intranet. On the clinic level, the Chief Medical Officer is represented by the physicians-in-charge and the Chief Dental Officer is represented by the dentists-in-charge.

This self-assessment plan describes actions and practices that the managers responsible for health care services follow to comply with the statutory obligations.

Reviewing the self-assessment plan is part of the personnel’s induction plan. This self-assessment plan is a tool to improve operations and its implementation is monitored as part of annual internal audits, for example.

2.4 Personnel

Approximately 12,500 people work at Terveystalo, half of which are in an employment relationship with Terveystalo. The largest caretaker groups include nurses and operating room nurses (approximately 1,000), occupational health nurses (nearly 800), radiographers (nearly 250), laboratory technicians (over 200) and practical nurses (450). The oral health team consists of approximately 350 professionals.

As part of the recruitment process, the competence of applicants is verified from the central register of Finnish health care professionals maintained by Valvira, the National Supervisory Authority for Welfare and Health. People working with children, as specified by law, have to present an extract from the criminal record before recruitment. The mandatory trial period for new employees also helps to ensure their competence. During the recruitment process, we review in detail the competences, required licenses and practical language proficiency of new employees in relation to the skills and competence required for the work tasks.

The induction training focuses on medication plans, patient record practices as well as the use of equipment and supplies.

Terveystalo arranges comprehensive supplementary training for the personnel. Supervisors ensure the implementation of training in personal development discussions. As part of quality auditing, we pay particular attention to the implementation of statutory radiation protection training and supplementary training for the occupational health personnel in accordance with the recommendation of the Ministry of Social Affairs and Health.

In addition to daily supervision practices, factors that restrict well-being at work are monitored in annual personnel surveys that are arranged at the unit and clinic level. Personnel surveys and private
practitioner surveys indicate how satisfied the personnel are with the preconditions for successful working. In accordance with our early intervention model, the supervisors are responsible for monitoring how the employees cope with their tasks. In addition, Terveystalo has practical guidelines for intervention for substance abuse. Occupational health care informs the employees and the company’s OHS organization and management of possible occupational health risks. Occupational health services for personnel are organized internally, and their ability to work is measured in different ways (health examinations for certain age groups, work-related health examinations and health surveys).

In development discussions, we set the objectives and the personal development needs for the next year. In case of private practitioners, the aim is to have a similar discussion once a year.

2.5 Premises, equipment, and supplies

We have a particular process and technical guidance for the planning of functional premises. The guidance considers the requirements of various types of premises. Radiation protection is designed and implemented in accordance with the safety assessment. Pressure equipment are placed in accordance with the Pressure Equipment Act 2016/1144.

The activities carried out on the premises determine the level of protection in terms of access control, burglary and fire protection. The existing systems of the property owners are utilized, where possible. A burglar alarm is installed in all premises. In fire protection, we comply with the National Building Code of Finland and pay particular attention to the fire protection of operating departments.

Medication is stored in locked, sufficiently large, and appropriate areas. Unauthorized access is prevented by access control and careful management of the keys for medication cabinets or rooms. The alcohol storages can be locked to prevent unauthorized access. In accordance with the safety instructions, the clinics take into account the more detailed descriptions for gases and flammable liquids, for example.

In cleaning, particular attention is paid to the special characteristics of health care, such as the cleanliness of the cleaning equipment and careful cleaning after use as well as the correct working order. The cleaning instructions also include the required detergents and disinfectants and their recommended use.

Our waste management guidelines are in line with the current Waste Act. Instructions for the handling of waste at the clinics, appropriate storage rooms and containers as well as transport and storage ensure that the waste does not create any risks or negative effects at any stage of waste management. Special waste in health care is emphasized to make sure that infectious and sharps waste as well as biological (ethical) and hazardous waste is processed safely at each stage.

Soile Komssi, Director, Imaging and Technology, is responsible for Terveystalo’s compliance with the Medical Devices Act, tel. +358 43 824 4029 soile.komssi@terveystalo.com. Medical devices have been recorded in a device registry, which includes statutory monitoring data. In the units, the local equipment managers are responsible for device safety, according to the instructions of the Technology Manager. The personnel uses Terveystalo’s internal electronic system to report incidents related to medical devices. Incidents are reported to the National Supervisory Authority for Welfare and Health and the Radiation and Nuclear Safety Authority, as required by law. The Radiation and Nuclear Safety Authority has issued a safety license for the use of radiation in each imaging unit and in oral health services.

Terveystalo Julkiset Palvelut Oy uses the premises and equipment designated by the customer in accordance with procurement contracts.

2.6 Patient Ombudsman

Terveystalo offers centralized patient ombudsman services. During the specified hours, you can reach the patient ombudsman by phone on +358 30 633 1655 or by e-mail: potilasasiamies@terveystalo.com. The patient ombudsman’s contact information is available in each Terveystalo’s clinic and on the
website. Terveystalo’s patient ombudsmen are Sanna Sarin, Johanna Toivonen, and Riitta-Liisa Karhunen.

Some outsourced units have agreed to use a municipal patient ombudsman and officer for social affairs.

The tasks of the patient ombudsmen at Terveystalo tasks are defined in the legislation. In addition, they regularly monitor and report our operations and participate in the development of our operations. The Group’s quality steering group is responsible for reporting. In terms of development work, the patient ombudsman participates in several working groups that aim to improve patient safety, quality, and customer experience.

The patient ombudsman provides regular training to the unit quality managers as well as physicians-in-charge and dentists-in-charge in issues related to patient rights.

2.7 Medication

Terveystalo has prepared a national medication plan that is used as the basis for the medication plan of each Terveystalo clinic. Medication plans are prepared in cooperation between various professional groups. These plans are used as a tool when introducing the medication practices of the clinic to new employees. The working group who prepared the medication plan is also responsible for updating it, and implementation of the plan is monitored in connection with internal audits and by the Group’s pharmaceutical services.

The national medication plan defines the related licensing process. The content of the plan is based on the updated “Turvallinen lääkehoito” (Safe medication) guide published by the Ministry of Social Affairs and the Health and National Institute for Health and Welfare in February 2016. The licensing practices related to pharmacological treatment concern the health care professionals involved in the medication of patients, and the necessary licenses depend on their education and work tasks.

Guidelines for medication incidents have been issued. Terveystalo clinics report suspected adverse effects of medicinal products, vaccines, and blood products to the Finnish Medicines Agency Fimea or the Blood Service. No medicinal products returned by patients or customers are used. They are always treated as medical waste.

Safe medication is ensured with annual inspections, and the personnel of dispensaries, pharmacists, and the designated contact person for pharmaceutical services participate in this work at the clinics. The personnel of dispensaries and the contact persons for pharmaceutical services monitor and document the consumption of medicinal products at the department level. The clinics keep records of ordered and delivered medicinal products.

The pharmaceutical services use an inventory and purchasing system called M@tsku in all hospital units and larger clinics and occupational health care units.

2.8 Identification of risks and faults and corrective measures

Terveystalo uses a risk assessment model to be able to identify risks to patient safety before any negative consequences occur. Based on the model, we define significant, moderate, and tolerable risks and then decide how to manage or eliminate these risks.

Incidents are recorded in a common system. Actual incidents are addressed in the clinics where they take place but experts of the Group services are involved in the process, when deemed necessary. A root cause analysis helps us to find and eliminate the root causes. Statistics and reporting of incidents also reveals any recurring problems and need for further instructions. Corrective measures are communicated to the personnel in unit meetings and training sessions. The Group’s medical management monitors the summaries of the incidents.
Some outsourced units use HaiPro, the municipal incident reporting system, and Terveystalo’s own system called Efecte. These units report incidents in two separate systems to ensure that the information is available to both Terveystalo and the municipality.

### 2.9 Patient records and processing of personal data

The guidelines related to patient records and processing of personal data are gathered in a Manual for information security in patient work.

The patient register is used in accordance with the privacy statement. The privacy statement is available in each Terveystalo’s clinic. Suomen Terveystalo Oy shares its patient register with external health care professionals who work in Terveystalo clinics either as self-employed professionals or as service providers through external companies.

Terveystalo complies with the obligation of secrecy defined in the Act on the Status and Rights of Patients. Every person who works at Terveystalo has signed a personal non-disclosure agreement. The use of the patient information system requires personal user identifiers. Access rights are granted based on the user roles required for the performance of the work tasks. Patient information is processed in accordance with the data protection and patient legislation for purposes defined in Terveystalo’s privacy statement. Information on Terveystalo’s customers is available in the register based on their consent.

Orientation of personnel to patient record management and data protection issues and verification of the required competence are described in the self-assessment plan for data processing systems.

Leena Alapuranen, Director, Data Protection, acts as the data protection officer at Terveystalo, tel. +358 40 357 7683, leena.alapuranen@terveystalo.com.

The customer is the data controller at Terveystalo Julkiset Palvelut. The information is processed inline with the customer’s instructions.

### 2.10 Strengthening patient participation and processing of feedback

The patients and their loved ones can provide oral or written feedback at Terveystalo clinics or by filling out an electronic form available on our website or by replying to an NPS survey they receive as a text message. In accordance with the Act on the Status and Rights of Patients, objections can be submitted through our website in a secure manner. Objections can also be submitted directly to the clinic or to the patient ombudsman.

Outsourced units who use municipal patient ombudsman services have their own process for processing official information requests.

### 2.11. Monitoring and evaluation of the implementation of the self-assessment

Implementation of the self-assessment plan is monitored with annual internal and external audits. The self-assessment plan is updated annually.