

Suomen Terveystalo Oy, Self-Monitoring Programme

Introduction

A service organiser and a service provider providing services in more than one service unit must prepare a self-monitoring programme covering the duties and services for which they are responsible. The self-monitoring programme must be prepared electronically and published on a public website or by other means that promote its public availability. The service provider's self-monitoring programme covers all of the service provider's service units (Act on the Supervision of Social Welfare and Health Care, section 26).

The matters referred to in this self-monitoring programme are described in greater detail in Suomen Terveystalo Oy's self-monitoring plan and in the related work instructions and processes appended to it.

Self-monitoring is the primary form of supervision. Its purpose is to ensure the quality of services and patient safety, as well as to identify and rectify any deficiencies or deviations. Terveystalo's risk management model ensures that risk management is systematic and that risks are identified, assessed, managed and monitored appropriately throughout the Group. Risk management is an integral part of Terveystalo's strategy process, decision-making, day-to-day management and operations, as well as its monitoring and reporting procedures.

This self-monitoring programme applies to the following service units of Suomen Terveystalo Oy. The service units cover the operations of all service points (locations) registered under them. The service points and fields of service are also recorded in the Soteri register.

- Terveystalo Digiterveys
- Terveystalo Helsinki Uniklinikka
- Terveystalo Helsinki Kamppi Ruoholahti
- Terveystalo Jyväskylä
- Terveystalo Kuopio
- Terveystalo Joensuu
- Terveystalo Lahti
- Terveystalo Savonlinna
- Terveystalo Kouvola
- Terveystalo Lappeenranta
- Terveystalo Tampere
- Terveystalo Turku
- Terveystalo Pori
- Terveystalo Mobiilimagneetti
- Terveystalo Mobiiliseulonta, rintasyöpäseulonta
- Terveystalo Seinäjoki
- Terveystalo Oulu
- Terveystalo Rovaniemi
- Terveystalo Hyvinkää
- Terveystalo Iso Omena

Healthcare service providers operating within Terveystalo (self-employed professionals and limited liability companies) have committed to complying with Terveystalo's self-monitoring programme and self-monitoring plan. In addition, they are required to prepare their own self-monitoring plan.

In accordance with the agreement concluded with the service provider, service providers must comply with generally accepted medical principles and with the operating practices and processes applied at the medical centre, using the tools provided by the medical centre. Unless otherwise provided by mandatory legislation, the medical centre and the service provider are each independently responsible for their own operations directly to patients, authorities and other relevant parties.

Information on the service provider and responsible persons

Service provider: Suomen Terveystalo Oy

Address: Jaakonkatu 3 A, 6th floor, 00100 Helsinki

Tel.: 030 633 11

Fax: 030 633 1602

Business ID: 1093863-3

Persons Responsible for the Service Units

Healthcare service units and fields of service (excluding occupational healthcare, oral healthcare and fields of service provided in public service units)

Chief Medical Officer, Healthcare Services: Jukka Pitkänen

Occupational healthcare service units and fields of service

Chief Medical Officer, Occupational Healthcare Services: Ilse Rauhaniemi

Private oral healthcare service units and fields of service

Chief Dental Officer: Ritva Lindblad

The addresses and contact details of Terveystalo's locations are available on Terveystalo's website.

Email addresses follow the format `firstname.lastname@terveystalo.com`.

This self-monitoring programme refers to Terveystalo's processes, work instructions and other materials available on Terveystalo's intranet.

Where the title physician responsible for the operations is used in this self-monitoring programme, it also refers, as applicable, to the occupational health physician responsible for the operations and the dentist responsible for the operations.

Mission and Operating Principles

Terveystalo is Finland's largest private healthcare service provider by revenue and one of Finland's leading providers of occupational healthcare services. We are building a future of healthcare that is seamless, caring and effective.

We provide comprehensive primary healthcare, specialised healthcare, oral healthcare, diagnostic imaging, laboratory, rehabilitation and wellbeing services to companies and private individuals, as well as services procured by wellbeing services counties.

Performance of Statutory Duties

Terveystalo's Medical Management Group serves as the company's highest medical decision-making body. The current Chair of the Medical Management Group also participates in the meetings of the Group Executive Team.

The Medical Management Group is chaired by the Chief Medical Officer for Healthcare Services. The Management Group consists of the Chief Medical Officers of the business areas and also includes the Chief Executive Officer, thereby ensuring close alignment between Group management and medical decision-making.

The Medical Management Group is responsible for defining and leading Terveystalo's medical vision and strategy and for monitoring their implementation. It is also responsible for leading and monitoring medical quality, treatment outcomes and patient safety, and for ensuring the effectiveness of medical leadership throughout the Group.

At the local and regional levels, the persons responsible for the service units are represented by physicians responsible for the operations, regional physicians responsible for the operations and, in rehabilitation services, the Service Director. They are supported in quality and patient safety activities by Directors of Health Services, persons responsible for quality and patient safety, Heads of Dental, and all supervisors.

Reviewing Suomen Terveystalo Oy's Self-Monitoring Plan is part of the personnel induction programme. Updates are reviewed at the local level whenever material changes are made. The Self-Monitoring Plan serves as a tool for the continuous development of operations, and its implementation is monitored, among other measures, as part of the annual internal audits.

Performance and Supervision of Statutory Duties at Different Levels

The performance of statutory duties is implemented and supervised at different levels:

- Guidelines related to self-monitoring are prepared by the Group functions (including the patient safety, data protection, quality, regulatory affairs, pharmaceutical services and technology teams). The Group functions support the implementation of the guidelines through training and consultation, among other measures, and conduct internal audits.
- Terveystalo's medical management and Legal Department ensure and provide guidance on compliance with applicable legislation.
- Physicians responsible for the operations at regional and local levels, Directors of Health Services, persons responsible for services/supervisors manage the operational activities of the locations, ensure personnel competence, and plan local operating practices together with personnel based on Group-level guidelines. Physicians responsible for the operations ensure medical quality and patient safety in cooperation with supervisors and persons responsible for quality and patient safety. Adverse events and feedback are handled collaboratively at both Group and local levels.
- Employees perform healthcare duties for which they have the required education and role-specific induction. In addition, each employee is responsible for their own work performance, compliance with applicable guidelines, and identifying their professional development needs. Employees have access to reporting channels for adverse events involving patients or employees, through which reports can be submitted either under the reporter's name or anonymously.

Compliance with Agreements

Suomen Terveystalo Oy is committed to complying with the agreements concluded with its partners (including occupational healthcare partners). Compliance with the contractual terms during the contract period is monitored as agreed in each agreement. The Director of Health Services and the supervisors at each location are responsible for ensuring that operations comply with the applicable agreements. Regular cooperation and follow-up meetings with contractual partners are used to ensure effective information flow and cooperation. Operations are reported to the designated contact persons of each partner as agreed.

Self-employed professionals and subcontractors working at Suomen Terveystalo Oy are committed to complying with the legislation in force at any given time and with Terveystalo's operating practices.

Availability, Continuity, Safety, Quality and Equal Access to Services

Availability of Services

We provide services at approximately 360 locations, including 18 hospitals. Terveystalo's digital appointments are available 24/7, regardless of time or location. The Terveystalo app and Terveystalo online services operate according to the same principles, enabling customers to easily book an appointment for the service they need at a time convenient to them. Appointments can also be booked by telephone 24/7 by calling 0900 30 000.

Continuity of Services

Terveystalo locations use a shared patient information system. This ensures that information related to the customer's or patient's care, such as previous visits, diagnoses, treatment plans, medication information and upcoming appointments, is available in real time to all relevant units and healthcare professionals, regardless of the location at which the customer has previously received services.

This supports continuity of care and the flow of information when a customer moves from one location to another within the service pathway or receives services from several units at the same time, such as primary healthcare, specialised healthcare, diagnostic imaging or laboratory services. The shared system eliminates the need for separate transfers of information or consultation requests between units when they concern internal cooperation within the same organisation.

Preparedness and continuity plans and other proactive measures are used to prepare for disruptions and emergency conditions.

Safety and Quality of Services

Self-monitoring ensures that systematic measures are taken at all levels of the organisation to support high-quality and safe services, cooperation between different professional groups, and the development of operating practices. Self-monitoring also ensures the continuous development of operations and the regular assessment of operational risks.

Terveystalo has been awarded ISO 9001 certification for its quality management system and ISO 14001 certification for its environmental management system, demonstrating that our services meet the customer and statutory requirements of these standards. Information on the certificates and their scope is available on Terveystalo's website under **Sustainability Reporting and Documents**. Terveystalo fosters a culture of continuous improvement and monitors and measures quality at several levels using a range of indicators. On the basis of these indicators, operations are regularly reviewed, areas for improvement are identified, and necessary changes are implemented.

Terveystalo's quality management system is founded on patient safety and the national legislation governing the healthcare sector.

The experiences of customers, patients and persons acting on their behalf are monitored continuously. Feedback and reminders under the Act on the Status and Rights of Patients may be submitted through the feedback channel on Terveystalo's website or by contacting a Terveystalo location. Regional Quality Management Groups review the overall situation and agree on any necessary measures. Persons responsible for quality and patient safety at the locations process feedback in the feedback management system in accordance with the relevant guidelines and in cooperation with the supervisors at the location. Where necessary, feedback is also discussed at personnel meetings at the location. Reminders are handled by the physician responsible for the operations.

Adverse event reports may also be submitted through Terveystalo's website. The process for handling these reports is the same as the process for adverse event reports submitted by employees, which is described in the Self-Monitoring Plan.

Patient ombudsperson services are organised by the wellbeing services counties and the City of Helsinki (Act on Patient Ombudspersons and Social Services Ombudspersons 739/2023, section 2). Patients are provided with guidance on these services on Terveystalo's website and, where necessary, in connection with the handling of feedback and objections.

Ensuring Patient Safety

Patient safety is managed, monitored and continuously developed at Terveystalo as part of quality management and self-monitoring, both at Group and local levels. The Patient Safety Manager is responsible for coordinating patient safety in cooperation with medical management, the Chief Medical Officer for Quality, the persons responsible for the relevant Group functions, and the persons responsible at regional level. The implementation of data protection and information security is monitored and guided by the Patient Care Data Protection Group. In addition, adverse events related to data protection are handled in the same manner as other adverse events.

Patient safety is ensured through personnel induction, maintenance of professional competence, mandatory training, up-to-date operating instructions, risk management, the reporting and handling of adverse events, audits, and the monitoring of self-monitoring activities.

At the local and regional levels, the persons responsible for the service units are represented by physicians responsible for the operations, occupational health physicians responsible for the operations, and dentists responsible for the operations. In quality and patient safety activities, they are supported by Directors of Health Services, Heads of Dental, persons responsible for quality and patient safety, and all supervisors.

The physician responsible for the operations at each location ensures that the duties which, under applicable legislation, regulations and the requirements of the supervisory authorities, must be specifically carried out within a healthcare organisation are duly performed at the location. The physician responsible for the operations leads patient safety activities and medical quality within the units under their responsibility. At local level, the physician responsible for the operations acts in accordance with the responsibilities and oversight of the person responsible for the service unit.

Quality Requirements for Suppliers and Subcontractors

Terveystalo's procurement activities are governed by its procurement policy. Procurement is carried out in a planned, cost-effective, and, to the extent possible, consistent and centralised manner. Terveystalo Group's ethical guidelines are followed in all procurement activities. Economic, taxation, legal, social and environmental considerations are taken into account in procurement and requests for tender. Procurement decisions must be based on overall cost-effectiveness and quality. The life-cycle impacts and costs of products and services, as well as considerations promoting energy efficiency, are taken into account in procurement. Terveystalo requires its suppliers to comply with the contractual requirements, applicable legislation, regulatory requirements and quality standards relevant to their respective sectors.

The quality indicators and targets set for Terveystalo's contracted suppliers are monitored in accordance with Terveystalo's SRM model. In addition, supplier audits are conducted annually, as agreed, for strategic suppliers and suppliers that are critical to Terveystalo's operations. Suppliers are required to operate in accordance with Terveystalo's Supplier Code of Conduct.

Recruitment and competence assurance

Terveystalo verifies the professional qualifications and professional practice rights of personnel working in healthcare duties from JulkiTerhikki before the commencement of an employment relationship or a contractual relationship with a self-employed healthcare professional. Terveystalo takes appropriate action in response to feedback received from supervisory authorities or clients concerning the conduct of personnel or the services provided. Employees who work with children, young people, persons with disabilities or older persons in duties covered by the applicable legislation are required to present a criminal records extract before being hired.

For self-employed professionals (sole traders) and companies, the recruitment and contracting process includes verification of, among other things, certificates of qualification, professional practice rights from JulkiTerhikki, registration in the Soteri register, Business ID, valid patient insurance, as well as adequate language proficiency and professional competence. The supervisory authority verifies the required criminal records extract for work

with children, young people, older persons and persons with disabilities in connection with registration. As these service providers are not employed by Terveystalo, they are independently responsible for matters such as continuing professional development.

Career Services monitors restrictions on professional practice rights published in the Official Journal. Any measures required as a result of such restrictions are decided by the person responsible for the service unit.

As part of our recruitment process, we carefully assess the selected person's professional competence, the licences and authorisations required for the duties, and their practical language proficiency in relation to the competence and qualifications required for the position. In addition, we verify the person's suitability and competence during the mandatory probationary period.

Self-Monitoring Plan

The Self-Monitoring Plan is prepared for Suomen Terveystalo Oy's service units and their service points (locations) in cooperation between the various Group functions. The Self-Monitoring Plan is supplemented by processes, work instructions and training.

Medication Safety

Medication safety is an important part of patient safety. At Terveystalo, promoting and monitoring medication safety, coordinating medication management at the national level, and harmonising related operating practices are the responsibility of the Group's pharmaceutical services function. The Group's pharmaceutical services function operates in alignment with medical management and is responsible for planning, implementing and leading measures to improve medication safety and manage risks associated with medication therapy. Heads of Medical Specialties provide medical expertise in support of the Group's pharmaceutical services function.

The primary objective of Terveystalo's Group-level Medication Management Plan is to support all locations providing medication therapy in ensuring the safety of the medication management process. Terveystalo's Medication Management Plan has been prepared taking into account the guidance issued by the Ministry of Social Affairs and Health in the *Safe Pharmacotherapy* guide (publication 2021:6). The Group-level Medication Management Plan is prepared and updated annually by the Group's pharmaceutical services function in cooperation with nurses working at the medicine centres, Heads of Medical Specialties, physicians responsible for medication management, and Service Managers. The plan is approved by Terveystalo's Administrative Chief Medical Officer. The Group-level Medication Management Plan provides the framework for implementing medication therapy at Terveystalo locations and serves as a guiding document defining the duties and responsibilities related to medication therapy, medication safety and location-specific Medication Management Plans.

At Terveystalo, locations prepare a location- or department-specific Medication Management Plan using a separate Medication Management Plan template. The location- or department-specific Medication Management Plan is based on the Group-level Medication Management Plan. It describes the medication therapy provided at the location, the related operating practices and associated risks in greater detail than the Group-level Medication Management Plan. The size of the location and the scope and complexity of its operations determine the level at which the Medication Management Plan is prepared. At Terveystalo's larger hospital locations, individual departments prepare their own department-specific Medication Management Plans. The management of the location is responsible for organising the preparation, implementation and monitoring of the Medication Management Plan. The plan is prepared at the location on a multidisciplinary basis and in cooperation between different professional groups. The location- or department-specific Medication Management Plan is approved by the physician responsible for the operations of the location or department.

Information Security and Data Protection

The Information Security Plan describes the information security and data protection practices of the social welfare and healthcare service provider and how the service provider organises the self-monitoring of information security and data protection. Terveystalo operates in accordance with the Act on the Processing of Client Data in Healthcare and Social Welfare (703/2023). This English name follows the terminology used by the Finnish authorities for the Client Data Act.

Instructions concerning the processing of patient records and personal data have been compiled in the Data Protection Handbook for Patient Care.

Information security is an integral part of protecting Terveystalo's patient and client data and ensuring continuity of service provision. The objective of information security is to safeguard the confidentiality, integrity and availability of the information processed and to ensure uninterrupted continuity of operations, including in exceptional circumstances. Information security is implemented on a risk-based basis in accordance with applicable legislation, regulatory requirements and contractual obligations.

The principles, responsibilities and procedures relating to information security are defined in Terveystalo's internal Information Security Policy and the related operating principles and instructions.

Information security is implemented on a risk-based basis. Information security risks are assessed regularly as part of the Group's risk management process and whenever changes occur in operations, systems or the operating environment. Appropriate technical and organisational measures are defined and implemented to

manage identified risks. The implementation of risk management measures is continuously monitored and assessed.

Appropriate technical and organisational measures are implemented to protect information against unauthorised access, alteration, loss or other unlawful processing. These measures include access control, the protection of data communications and information, maintaining systems up to date, backups, and information security monitoring. More detailed implementation measures are defined in internal documents.

Terveystalo complies with the obligation of confidentiality concerning patient data. Everyone working at Terveystalo has signed a confidentiality undertaking.

Data protection forms part of the induction of persons working at Terveystalo. Supervisors are responsible for ensuring that their employees receive the required induction and that it is appropriately documented. Everyone working at Terveystalo is required to complete training on data protection and information security and to regularly maintain their competence in these areas. Supervisors are responsible for monitoring compliance with these requirements.

Suomen Terveystalo Oy has appointed a Data Protection Officer in accordance with the EU General Data Protection Regulation (GDPR). The Data Protection Officer is an internal expert who supports the organisation in complying with data protection legislation. The Data Protection Officer cooperates with the supervisory authority. Contact details for the Data Protection Officer: tietosuoja@terveystalo.com.

Equal Access to Services

The Non-Discrimination Act requires service providers to describe in their Non-Discrimination Plan how they promote equality among customers, prevent and address discrimination, and enhance inclusion. The operational Non-Discrimination Plan is based on section 5 of the Non-Discrimination Act (1325/2014), which provides for the authorities' duty to evaluate and promote equality and to prepare a plan of the necessary measures for the promotion of equality.

Terveystalo's intranet provides guidance on equality and non-discrimination within the Group.

Corrective Actions for Identified Deficiencies and Deviations

The supervisors at the relevant location are responsible for correcting deficiencies identified in the availability, continuity, safety and quality of services and in the equal treatment of customers, in cooperation with the physician responsible for the operations at the location and the Director of Health Services. The most significant deviations are addressed in cooperation with the relevant persons responsible at Group level.

The status of client and patient safety is monitored regularly through internal and external audits, self-assessments, self-monitoring activities, adverse event reports, feedback, reminders, complaints and patient injury notifications. The Self-Monitoring Plan describes in greater detail the collection, analysis and reporting of these notifications. Events, incidents or hazardous situations that have seriously endangered client or patient safety, as well as other serious deficiencies, are reported without delay to the competent authority, such as Fimea or the Finnish Supervisory Agency, and are handled in accordance with the process instruction Handling of Serious Adverse Events. Fimea also uses the terms incident and serious incident in its English-language regulatory guidance on medical devices.

Risk analysis and preparedness for hazardous situations are carried out at all levels of the Group. Responsibility for the implementation of risk management lies with the management of the business areas and Group functions. The Chief Financial Officer coordinates the risk management process together with designated persons, is responsible for risk reporting, and participates with the business areas and Group functions in identifying risks and determining risk management measures. Everyone working at Terveystalo is required to identify and manage the risks within their own area of responsibility. The Group Preparedness Team provides guidance and instructions for managing sudden and potentially escalating crisis situations and crisis communications.

In their day-to-day operations, Terveystalo locations ensure compliance with established practices and instructions, the achievement of process objectives and outcomes, and the identification of risks that may threaten patient safety and occupational safety, as well as the implementation of measures to prevent such risks. Implementation is monitored by the regional Quality Management Groups and at Group level.

Publication of Monitoring Findings and the Measures Taken on Their Basis

The monitoring of self-monitoring activities and any amendments to the Self-Monitoring Plan are reviewed by both the Medical Management Group and the Patient Safety Forum four times a year. The persons responsible for the Group functions (e.g. outpatient services, hospital services and oral healthcare) provide an account of the monitoring of the Self-Monitoring Plan and any necessary amendments at these meetings. Amendments are also made as necessary on an ongoing basis. Any amendments are recorded in the section below.

Amendments to the Self-Monitoring Programme:

The forums for monitoring self-monitoring activities have been updated.