





Private healthcare self-monitoring plan

1. Information about the service provider

Name of the service provider Compass Psychology Oy		Business ID of the service provider 3324125-7
Name of the establishment Compass Psychology		
Postal address Vuorikatu 22 A 8; Northern Hesperian Street 3 B 9.		
Postal code 00100; 00260	Postal address Helsinki	
Director of Health Services Hatty Francis-Ehnholm		Phone number 0408549962
Postal address Asematie 34a		
Postal code 02700	Postal address Kauniainen	
Email hatty@compasspsychology.fi		

2. Mission statement/Priority task

Values and policies

- Understanding cultures and sensitivity in psychological therapy, support and counselling.
- A safe and welcoming place where customers can talk and get help, support and advice.
- An international team of psychologists and psychotherapists, recognised by the Valvira, offers therapy and help in several languages.
- Compliance with Finnish and EU legislation on assistance, data protection, confidentiality and security (including informing other institutions and professionals, e.g. social services, where appropriate).
- All customers provide informed written consent to the sharing of their personal data with third parties.
- Using science-based evidence-based practices in our approach to clients.
- Clients and therapists agree on certain rules, such as adherence to schedules and proper notification if a session has to be cancelled, for example, for 24 hours or more.
- Clients are informed about the therapy and what to expect before it starts.
- At the beginning of the process, a treatment schedule is agreed.
- Case formulation and goal setting is key to our approach.
- Compass Psychology Ltd's owners, employees and subcontractors are required to undergo regular supervision and to participate regularly in professional development seminars and groups.
- All employees and contractors must attend weekly company or group meetings.

Mission statement/Prior tasks

We provide high quality, evidence-based, culturally sensitive psychological therapy, assessment and consultation to adults, adolescents, children and their families in an environment where clients feel relaxed, safe and understood. We aim to provide therapy in a variety of languages to make it accessible to both Finns and the ever-growing international community.

avi0402l5 en **1 / 11 3. Organisation and management of self-monitoring**

A description of the measures and procedures by which the director of health care services will discharge his or her responsibilities under the law.

Compass Psychology Ltd's Director of Healthcare Services ensures compliance with data protection laws by thoroughly familiarising staff and contractors with the company's data protection and storage policies, providing secure filing cabinets and auditing staff and contractors weekly at regular team meetings. Staff training and supervision is carried out in cooperation with Assistant Manager Harriet Francis-Ehnholm.

The Director ensures ethical conduct by employing staff and subcontractors who are certified clinical psychologists by the Valvir and who have therefore completed training covering the ethical responsibilities of a psychologist.

A plan for staff induction and training and participation in the design and implementation of self-monitoring.

All employees and subcontractors are interviewed by the company owners to check their suitability to work for the company.

Compass Psychology's Clinical Director Harriet Francis-Ehnholm spends at least two hours with each new employee/sub-employee explaining to them all the procedures used at Compass Psychology and where they can access relevant documents.

All employees and subcontractors provide proof of their right to work as a psychologist/psychotherapist in Finland (Valvira number, etc.).

All employees and subcontractors sign an employment contract, which sets out the terms and obligations of their employment with Compass.

All employees/sub-projects will be provided with a Compass email address and access to the shared Compass Psychology Google site.

All employees and subcontractors acquire clients either through Compass Psychology's marketing or through their own Minduu brands.

All employees and subcontractors are visited twice a year by Harriet Francis-Ehnholm to check their performance and that they are complying with the terms of their contracts. At these meetings, employees and subcontractors can also ask questions about their work, Compass' policies and raise any concerns they may have. The meetings are documented and signed by both parties and kept in a locked cabinet.

All employees and subcontractors provide proof of their right to work as a psychologist/psychotherapist in Finland (Valvira number, etc.).

All employees and subcontractors must report annually to Valvira on their customer contacts, e.g. the number and type of contacts.

All employees and subcontractors are required to have liability insurance to work for Compass Psychology.

All employees and subcontractors must have clinical supervision with an external clinical supervisor (on-the-job supervision) at least once a month.

All employees and contractors must attend weekly staff meetings where they have the opportunity for professional development and are kept up to date on all matters relevant to Compass Psychology or changes in Finnish legislation, etc. At these meetings, staff can also raise any concerns or questions they may have.

All employees and subcontractors must participate in at least two external professional development training courses each year. Subcontractors are responsible for paying for this themselves.

4. Staff

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Description of the number and structure of staff

The owners of Compass Psychology Ltd, Annabel Battersby (Director) and Harriet Francis-Ehnholm (Clinical Director), are also employees of Compass Psychology Ltd and both health care (psychology) providers. The company will therefore provide healthcare services through these two employees. The third employee is our office manager, Annie Roland, who works an average of 5 hours per week and takes care of the office duties of the company.

The rest of Compass Psychology's staff are currently subcontractors with their own Business Name and are not employees. In the future, it may be possible that Compass Psychology will start employing psychologists. Compass Psychology currently has 6 psychologists and one doctor/psychotherapist in training as subcontractors. We hope to increase this number.

We also have a cleaner who uses her own business name. The cleaner cleans the office once a week.

Business IDs and contact details of Compass Psychology employees and subcontractors:

Annabel Battersby: 2827389-5, annabel@compasspsychology.fi Hatty Francis-Ehnholm: 2498669-5, hatty@compasspsychology.fi Kim Seppälä: 3206619-4, kim@compasspsychology.fi Annelies Van Tieghem: 3336874-1, annelies@compasspsychology.fi Amy Lindroos: 2511906-7, amy@compasspsychology.fi Jenine Simons: 3383280-7, jenine@compasspsychology.fi Lizeth Ortiz: lizeth@compasspsychology.fi Viivi Elo-Rauta: 3415675-9, viivi@compasspsychology.fi Clara de la Riva: 3379182-2, clara@compasspsychology.fi

Description of the principles for recruiting staff (checking eligibility: (https://julkiterhikki.valvira.fi/) language skills, criminal record checks for people working with children, etc.).

Annabel Battersby, Kim Seppälä, Harriet Francis-Ehnholm, Annelies Van Tieghem, Amy Lindroos, Annelies Van Tieghem and Lizeth Ortiz have clean criminal records for working with children and young people. If we start new subcontractors, they will not work with children and young people until these records are obtained.

Description of the induction of staff and students. Particular attention should be paid to the medication management plan, patient documentation practices and the use of equipment and supplies.

As Compass Psychology does not work with pharmaceuticals, no training is required in this area.

Harriet Francis-Ehnholm briefs all staff before they start work. Compass Psychology has the following documents (see below) that staff are expected to either share with clients or use for record keeping, and all staff are shown where these blank documents can be found and where they will be kept once completed. All documents are kept in the client's own folder in a locked cabinet behind a locked door. Compass Psychology does not use any digital or online database to store client records.

New employees are also shown where to find notebooks, papers and folders and how to use the copier/printer.

The documents that are shown to staff, how to find them and how to use them at each client meeting:

- A brochure about therapy and what to expect.
- A document that clearly explains how customer data will be stored and retained and for how long.
- The therapy contract, which includes the client's contact details, information about confidentiality (according to Finnish law), information about Compass Psychology oy's legal obligations and the conditions for cancelling sessions.
- Notes on the therapy process, with space for case formulation and a therapy plan. A new process note page should be used for each session, with a section on risk assessment.
- A form to summarise at the end of treatment and send to the KELA warehouse. After discussion and agreement with the manager or clinical director, the remaining process notes are destroyed.

All the above-mentioned written documents will be kept in the customer's own file in a locked cabinet at the address on the mountain road.

A description of how to maintain staff skills and well-being at work and how to manage skills. Procedures for planning and monitoring in-service training, monitoring of competences, skills and their development, development interviews.

All employees and subcontractors must have clinical supervision/work supervision at least once a month.

All employees and contractors must attend weekly staff meetings where they have the opportunity for professional development and are kept up to date on all matters relevant to Compass Psychology or changes in Finnish legislation, etc. At these meetings, staff can also share any concerns, questions or queries they may have regarding Compass Psychology's activities.

All employees and subcontractors must participate in at least two external professional development training courses each year. Subcontractors are responsible for paying for this themselves. Compass Psychology regularly distributes professional development opportunities in Finland and online to all staff.

All employees and subcontractors are visited twice a year by Harriet Francis-Ehnholm to check their performance and that they are complying with the terms of their contract (e.g. supervision and professional development). These meetings also include questions about staff wellbeing, and plans can be made if they feel overworked or stressed. At these meetings, employees and contractors can also ask questions about their work and any concerns they may have. These meetings are documented and signed by both parties and kept in a locked cabinet.

The quality of care is monitored by giving feedback surveys to clients at the end of groups and by tracking the number of clients staying in care and their progress. If shortcomings are identified in these areas, these are addressed with the contractors in development meetings.

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5. Facilities, equipment and supplies

A description of the design of facilities critical to patient safety and their suitability for their intended use.

The rooms are furnished appropriately for the provision of psychotherapy, with a desk and chair for computer work, sofas or armchairs for the therapist and client, tables for tissues and small items, and soundproof panels on the walls. Soundproofing panels in each therapy room and white noise devices in the reception areas minimise any sound leakage through doors to ensure that sensitive information is not heard between rooms. The facilities are spacious and comfortable and have passed health inspections and all recommendations for improvement have been taken into account (see inspection reports attached to the AVI application). Description of the organisation of the premises, access control, burglary and fire protection. Particular attention should be paid to the description of the pharmaceutical and laboratory facilities.

The premises have working fire alarms and the entrances to the apartments have standard locked doors and are insured. Adequate security measures against burglars are also ensured in the building blocks where our offices are located.

Access to the premises is shared between employees so that several employees can use the same premises, but each employee has keys only to their own filing cabinets, so at no point can employees access information to which they do not have legal access.

The offices have emergency plans displayed for customers at the entrance, instructing them in the event of a fire on the premises.

Description of procedures for cleaning, waste management and hazardous waste management. Particular attention should be paid to practices related to infectious waste. (STTV Guides 3.2006)

Compass Psychology does not produce infectious or toxic waste. Each office has a plastic bag-lined bin where clients can put wet tissues (if they cry). There is also a bin in the waiting room for tea bags and coffee cups. In the kitchen there is a bin for general waste, compost waste, cardboard and plastic. A cleaner empties all bins once a week and cleans the kitchen, four offices and two toilets once a week. Towels and clothes are washed weekly. Hand sanitizer is provided in each office and waiting room. The toilets have hand soap, hand towels and feminine hygiene products.

A medical device is defined in Section 5 of the Health Care Equipment and Supplies Act (629/2010):health care equipment is an instrument, apparatus, device, software, material or other device or accessory, used alone or in combination, which is intended by the manufacturer for the diagnosis, prevention, monitoring, treatment or alleviation of a human disease, among other things. The obligations of the operator are laid down in Sections 24-26 of the Act on Health Care Equipment and Supplies and in <u>Regulations 1-</u>4/2010 issued by the Social and Health Licensing and Control Agency. Incidents involving healthcare equipment and supplies are reported to the Finnish Medicines Agency (Fimea).

The self-monitoring plan designates a person responsible for the safety of professionally used equipment and supplies in the establishment who ensures that notifications of incidents and other equipment-related regulations are followed.

Name and contact details of the person responsible

Annabel Batterby

A description of the health equipment and supplies on the premises.

Hand disinfectant: waiting room and all office areas Hand soap: 2 toilets and kitchen General office cleaning equipment and chemicals are stored in the kitchen cleaning cupboard. The kitchen cupboard also contains toilet paper, kitchen towels, a first aid kit and clean

clothes and towels.

The toilet cabinets are stocked with feminine hygiene products.

Description of procedures for reporting equipment and supplies-related incidents and for complying with other equipment and supplies-related regulations.

The equipment stored in our offices does not pose a risk of damage.

Use of radiation in healthcare

The use of ionising radiation in health care in Finland requires a safety licence from the Radiation and Nuclear Safety Authority in accordance with Section 48 of the Radiation Act (859/2018), unless the activities used are exempted from a safety licence in Section 49 of the Radiation Act.

Safety authorisation granted by the Radiation Safety Centre

Clinical microbiology laboratory activities

Laboratory tests and tasks necessary for the control of communicable diseases can be carried out in a laboratory approved by the Regional State Administrative Agencies. Communicable Diseases Act (1227/2016) § 18.

Clinical microbiology laboratory licence valid until

6. Patient Ombudsman

Name and contact details of the Patient Ombudsman

Ruth Franco email: ruth.franco@linpsychology.com

Ruth Franco's telephone number is +358 45 6505 068.

A description of the procedures for the proper definition of the patient ombudsman's tasks: advisory role, assistance, information and education, monitoring the quality of services and providing feedback.

Where appropriate, an advisory role.

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7. Drug treatment

Description of the maintenance, updating and implementation of the medication treatment plan and monitoring of its implementation The medication treatment plan must be drawn up in accordance with the Safe Medication Treatment Guide (2021:6) of the Ministry of Social Affairs and Health. The STM guide can be found at: https://julkaisut.valtioneuvosto.fi/handle/10024/162847

Drug treatment is not part of the services provided by Compass Psychology Ltd. Therefore, the fields in section 7 of this form do not apply to us.

Description of the procedures to be followed in the event of an incident in the provision of medical care

Description of the policy on the handling of returned and unused medicines

Description of the implementation of medication management, control of the monitoring of the consumption of medicines

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8. Identification of risks and anomalies and corrective measures

Description of the procedure for proactively identifying risks, critical operations and incidents.

All Compass Psychology Ltd employees and subcontractors are informed of the procedures to ensure the safety of clients and their own safety when they start working for the company. The psychology team meets weekly to discuss any concerns about work or related risks. The team also communicates effectively by email and in person at all working hours, so help and consultation with colleagues is available at short notice. Professional awareness and effective ongoing communication are key to identifying at an early stage any risks that may arise in a client's care.

Description of the procedure for dealing with near misses and detected anomalies

As client notes and clinical procedure plans etc. are kept in locked cabinets, the only possible near misses can occur in email communication.

All emails received from customers are read and deleted immediately. If customer data is accidentally shared via email or if Compass' email system is breached, the Helsinki GDPR department will be notified immediately.

A description of the procedure to be followed to remedy the deficiencies found.

In the above case, we await the advice of the Helsinki GDPR department.

A description of how corrective measures will be communicated to staff and, where appropriate, partners.

Staff, clients or other persons concerned will be informed in a face-to-face meeting and with the support of Compass Psychology management.

For more information on this, see <u>STM publications 2011:15: Risk</u> management and safety planning. Guide for social and health care management and <u>safety management</u>. for safety designers

avi0402l5 en 7 / 11 9. Medical records and processing of personal data

A description of the recording, processing and confidentiality of patient data. More information on the storage of medical records

Compass Psychology complies with the Finnish and European GDPR legislation in the storage of personal data of its customers. In particular, the following laws are complied with: 785/1992 Act on the Status and Rights of Patients 152/1990 Act on private health care 94/2022 Decree of the Ministry of Social Affairs and Health on medical records

- At Compass, we do not use digital or online data. On their first visit, customers fill in a customer information form, which explains their contact details, our confidentiality policy, our legal obligations and our cancellation policy. This form, together with the written session notes that (according to Finnish law) we write after each session with the client, is kept in the client's personal file in a locked filing cabinet behind a locked door in our office on the mountain road. Session notes include brief notes of what was discussed at each assessment, risk assessment plans and the overall planning and implementation of the client's care, as well as any details of any further treatment or other health professionals to whom we may refer you.
- At the end of therapy, a 1-page summary of the client's treatment is created in Compass, which includes information about the dates of the sessions, the reason for entering therapy, the test results and a summary of the results of the therapy, and is shared with the client. This summary is kept in a locked filing cabinet for <u>10 years</u> after the client has completed their therapy session at Compass Psychology. After 10 years, we will send this summary to the CECA archives for safekeeping <u>at</u> <u>https://www.kela.fi/yheitstyopampnit-paperisten-potilas-ja-asiakasasiakirjonenarkistointipalvelu.</u> All psychologists' own notes on the progress of the client's treatment will be destroyed as soon as the treatment ends.
- According to Finnish law, the Kela archives <u>keep records for a maximum of 12 years</u> <u>after the death of the client or 120 years after his or her birth (if the date of death is</u> <u>unknown)</u>.

Consent:

- If the client and his/her psychologist decide that the client needs to contact another professional, for example because of a risk, further assessment or need for diagnosis/medication, the psychologist will ask the client to fill in a consent form so that he/she can share the client's information with that professional. If the client does not want certain information to be shared with that professional, he or she has the right to inform the psychologist what information he or she does not want to be shared. The psychologist must record what information the client has agreed to share and the client must sign and date this form. The form is kept with the client's notes.
- The psychologist attaches a list to the front of the client's file, clearly detailing the history of the client's notes. It will indicate to whom the client has given consent to

access his/her notes/information and when, as well as exactly what information has been shared. If notes need to be corrected, a record of this is kept, as well as a record of who made the corrections. A copy of the original notes shall be kept.

Complaints:

If a customer is dissatisfied with their treatment at Compass, has any questions or wishes to make a complaint, the first thing they are instructed to do (both in the original information sheet and on request) is to contact the company's ombudsman, Ruth Franco.

Description of staff induction and skills assurance patient records management and data protection issues.

Harriet Francis-Ehnholm will give all staff a 2-hour orientation on Compass Psychology procedures before starting work. Compass Psychology has the following documents (see below) that staff are expected to either share with clients or use for record keeping, and all staff will be shown where these blank documents can be found and where they will be kept once completed. All documents are kept in the client's own folder in a locked cabinet behind a locked door. Compass Psychology does not use any digital or online database to store client records.

New employees are also shown where to find notebooks, papers and folders and how to use the copier/printer.

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- Notes on the therapy process, with space for case formulation and a therapy plan. A new process note page should be used for each session, with a section on risk assessment.
- A form summarising the work at the end of the treatment, which is sent to the KELA warehouse. After discussion and agreement with the manager or clinical director, the remaining process notes are destroyed.
- All blank forms in these documents, as well as other psychological assessment tools and questionnaires, are stored on a shared Google drive at Compass Psychology, accessible to all staff.

Staff can ask Harriet Francis-Ehnholm or Annabel Dalby at any time if they are unsure about a procedure. We have a very open communication style in our office, where staff feel they can ask questions if they are confused or unsure about a procedure.

All employees and contractors must attend weekly staff meetings where they have the opportunity for professional development and are kept up to date on all matters relevant to Compass Psychology or changes in Finnish legislation, etc. At these meetings, staff can also share any concerns, questions or queries they may have regarding Compass Psychology's activities.

All employees and subcontractors are visited twice a year by Harriet Francis-Ehnholm to check their performance and that they are complying with the terms of their contracts. At these meetings, employees and subcontractors can also ask questions about their work, Compass' policies and raise any concerns they may have. The meetings are documented and signed by both parties and kept in a locked cabinet.

Name and contact details of the Data Protection Officer

Annabel Battersby (Director of Compass Psychology), annabel@compasspsychology.fi

The controller of patient data shall draw up a <u>statement of processing operations</u> in accordance with Article 30 of the General Data Protection Regulation (EU,2016/679). The processor shall also maintain a record of all processing operations carried out on behalf of the controller in accordance with the General Data Protection Regulation (Article 30).

Patient and customer record form (www.valvira.fi) Instructions for filling in

the form Other guides on data protection at: https://tietosuoja.fi

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10. Confirming patient involvement and handling reminders

A description of the procedures for patients and their relatives to provide feedback on the lack of quality management and patient safety.

At the first meeting, customers are given an information sheet on the retention of their data and their rights (see annexes). This form gives them the details of our patient advocate, Ruth Franco, as well as the details of the AVI if they have concerns about quality or patient safety. Ruth Franco's details are also included in the customer information leaflet we distribute to our customers and we will provide patients or their relatives with this information on request.

A description of how feedback is handled at the site.

At the institution, clients can consult a brochure describing the rules and regulations governing the practice of psychology and their rights as patients. See Annex 5.3. They can then give feedback directly to their psychologist, the director of Compass Psychology or patient advocate Ruth Franco. Their contact details are available in the brochure.

A description of how feedback is used to develop activities.

Using feedback on psychological training methods: professionals at Compass Psychology organise a weekly professional development session for their staff, where they are briefed on a range of practice-relevant topics and taught practical skills that they can use to improve their practice. Feedback from clients can be used to plan these sessions to improve psychological practice for all staff. If feedback is deemed to be more personal or specific to a staff member, managers Annabel Battersby or Hatty Francis-Ehnholm will talk to the staff member and provide them with resources to develop their skills.

Using feedback on logistical issues: logistical practices such as the nature and duration of workshops, types of events organised, marketing strategies, etc. are continuously developed based on feedback from clients and psychologists working with Compass Psychology. Weekly practice meetings are one place where the team is informed of any changes and where feedback and ideas are gathered to inform future plans.

According to Section 10 of the Act on the Status and Rights of Patients (Patient Act 785/1992), a patient who is dissatisfied with health and medical care and the treatment related to it has the right to submit a reminder. The reminder procedure is the primary means of clarifying the case of a patient dissatisfied with his or her treatment and care. A written reply to the reminder must be given within a reasonable time of its submission. A reasonable time is generally considered to be between 1 and 4 weeks, unless there are specific reasons for a longer period.

The Director of Health Services is responsible for ensuring that complaints are handled carefully and appropriately. The matter described in the complaint must be investigated objectively and in sufficient detail for the patient to feel that the investigation is reliable and that he or she has been heard. The decision on the reminder must indicate what action has been taken in response to the reminder and how the matter has otherwise been resolved. There is no right of appeal against the decision on the reminder, but the case may be reopened if new facts emerge. The documents resulting from the handling of the reminder are kept in a separate archive from the patient file. If the documents generated by the appeal contain information relevant to the patient's treatment, they may be included in the patient file. For more information, see the Valveira website https://www.valvira.fi/terveydenhuolto/valvonta/toimintayksikoiden_valvonta/muistutuks ee <u>n-response</u>.

Description of the procedures for responding to reminders.

Any complaints or feedback about the quality or service of Compass Psychology will be dealt with by the Health Manager/Clinical Director, Harriet Francis-Ehnholm. Harriet will review feedback objectively and carefully. The matter described in the complaint will be investigated, e.g. the staff member concerned will be interviewed or the case will be thoroughly investigated. Harriet will then report the findings to the complainant, both formally in a report and in person. Harriet's decisions in her report ensure that the client has felt heard and that the investigation has been reliable. Harriet also consults with Compass Psychology's Patient Advocate to get an objective view and feedback on how the case should be resolved. The complainant will also be told that she can contact Ruth Franco (Ombudsman) for further clarification and advice. The results of the investigation and the report will be kept in a separate file from the client's own file. If the documents relating to the complaint concern the client's care, they will be placed in the medical file. The case can be reopened at any time if new facts emerge.

11. Monitoring and evaluation of the implementation of self-monitoring

A description of the monitoring of the implementation of self-monitoring.

The engagement of Compass Psychology staff and any questions or concerns about this self-management plan will be addressed both in weekly team meetings with staff and in individual review visits.

Description of the process for updating the self-monitoring plan.

The plan will be implemented as outlined, as long as there are no changes to hiring, training, record-keeping and customer information practices. If a change occurs or is about to occur in any of the areas outlined in this plan, the Director of Health Care Services will ensure that the new procedures comply with the laws under which we operate.

Staff are informed of changes in activities both in writing by e-mail and in person at meetings. The commitment of staff to the new procedures affecting them is ensured by obtaining their written consent to read and accept the new conditions or procedures. Ongoing monitoring will continue as outlined above.

The self-regulatory plan is confirmed annually, even if there are no changes.

Changes to the code of conduct are recorded in the self-monitoring plan without delay and communicated to staff.

The self-monitoring plan is confirmed annually, even if no changes have been made during the year.

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Place and date	The self-monitoring plan is approved and confirmed by the Director of Health Services	
Helsinki, 17 August 2023		
	Insert name	
	Harris	
	Abattersby	
	Annabel Battersby and Harriet Francis-Ehnholm	

Annexes to the self-monitoring plan:

- 5.1 Updated information and storage document
- 5.2 Customer consent form for data sharing
- 5.3 Brochure for customers

Contact information for Regional State Administrative Agencies

Contact information for Regional State Administrative Agencies

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