

## Bath Clinic

### ***Introduction***

Consultants are critical to each Circle Health Group hospital. However, in common with other private healthcare operators and in most instances, Circle Health Group does not employ these consultants. Instead, most consultants working in our hospitals are self-employed practitioners who see and treat patients at our hospitals under the terms of our “Practising Privileges” policy.

In 2014, the Competition and Markets Authority issued an Order (the “**CMA Order**”) regulating the relationships between private hospital groups and consultants who have Practising Privileges or treat private patients or refer them for tests at group facilities (“**Referring Clinicians**”).

In accordance with the CMA Order, hospital operators are prohibited from entering into any incentive schemes that are designed to encourage Referring Clinicians to refer private patients to, or treat private patients at, their facilities. Circle Health Group does not operate any such schemes. The Order also requires hospital operators to disclose information about certain arrangements they have with Referring Clinicians, including ownership interests held by Referring Clinicians in the hospital operator or in equipment used in the hospital; the provision of certain “high value” services to Referring Clinicians; the availability of “low value” basic amenities for Referring Clinicians; and any remuneration for services provided by Referring Clinicians to the hospital. Set out below is information about the arrangements we have with Referring Clinicians at our hospital.

### ***Higher Value Services***

We charge our Referring Clinicians £22 per hour for using consulting rooms at our hospital and £18 (plus VAT) per hour for using our medical secretarial services (including billing for consultant services), except in relation to NHS patients.

We charge our Referring Clinicians £5 per hour (plus VAT) for using space for their own medical secretaries, inclusive of telephone charges.

### ***Lower Value Services***

We provide a number of support services to our Referring Clinicians, for which we do not make a charge. Further details regarding these arrangements are provided on our corporate webpages ([Consultants](#) and [GPs](#)).

### ***General Corporate Hospitality***

At this hospital, we provide general corporate hospitality as detailed on our corporate webpages ([Consultants](#) and [GPs](#)).

In addition, we invite members of our hospital Medical Advisory Committee to an annual dinner. The Clinical Chair, Executive Director and Director of Clinical Services attend the annual dinner as well. The dinner costs approximately £45 per person.

As part of the consultants’ practice, we hold Specialty Meetings to understand how we can work collaboratively to improve patient experience, efficiencies in the hospital and to learn from incidents/ complaints. These meetings are mostly held virtually. However, on occasions these

meetings are held in the evenings at the end of clinics/ surgical lists. On such occasions, we would usually eat at the hospital restaurant prior to the meeting. On occasions when this is not possible, we would arrange a meal at a local restaurant, meals will cost approximately £35 per person.

In exchange for MRI services provided by the hospital to Bath Rugby Club, to the approximate value of £15,000 per annum, the hospital receives sponsorship opportunities, access to the venue to host events, and 12 tickets to corporate hospitality, which the hospital makes available to staff and Referring Clinicians.

### ***Financial Interests***

Mr Dominic Ayers, Consultant Plastic Surgeon, owns his own TDB6 Bipolar Diathermy Machine for use at the hospital. The hospital does not pay for use of this equipment.

### ***Services Arrangements***

Dr Peter Marden, Consultant Gastroenterologist, is paid £4,000 per year to act as JAG Lead for our hospital.

Bath Anaesthetic Group LLP (in which the following Consultant Anaesthetists each own an equal share: Dr Robert Axe, Dr Robert Bruce-Payne, Dr Tim Cominos, Prof. Timothy Cook, Dr Richards Edwards, Dr Andy Georgiou, Dr Stuart Gold, Dr Kim Gupta, Dr Rowan Hardy, Dr William Headdon, Dr Ian Kerlake, Dr Rebecca Leslie, Dr Chris Marsh, Prof. Jerry Nolan, Dr Andrew Padkin, Dr Charlie Pope, Dr Jonathan Price, Dr Christopher Seller, Dr Mark Sheils, Dr Thomas Simpson, Dr Alec Snow, Dr Pete Steed, Dr Malcolm Thornton) is paid £2,100 a month to triage patients in preparation for surgery.

Dr Alastair Kerr, Consultant Geriatrician and General Physician, is paid for any post-operative inpatient services. The fees charged are £230 for an initial inpatient assessment and £140 per follow-up assessment.

Dr Chris Knechtli, Consultant Haematologist, is paid £100 per report for pathology reporting of bone marrow biopsy specimens performed at Bath Clinic.

### ***Clinical Chair***

Mr. Jonathan McFarlane is the Clinical Chair of the hospital. Mr McFarlane's role includes chairing hospital Clinical Governance Committee meetings and attending the hospital's Senior Management Team meetings. Mr. Jonathan McFarlane is paid £13,000 per year for these services (1 session per week). In addition, the Clinical Chair will also attend national Clinical Chair meetings, generally in London, for which we reimburse their reasonable travel and attendance expenses.

### ***Questions***

Should you have any further questions in this area, please contact us by email at [corporate.compliance@circlehealthgroup.co.uk](mailto:corporate.compliance@circlehealthgroup.co.uk).

*February 2025*