

Circle Health Group and General Practitioners (GPs)

Working with GPs

At many Circle Health Group hospitals, private GPs can provide quick and convenient diagnosis and treatment. In most instances, these GPs are self-employed as individual practitioners or are members of a general practice group. While not employees, Circle monitors GPs treating patients in our facilities in accordance with our “Practising Privileges” policy to ensure that you receive the highest standard of medical care. We undertake a thorough vetting process before we grant Practising Privileges to verify each GP’s qualifications and fitness to practice. In addition to mandated annual appraisals conducted by the GP’s designated body (usually NHS England or the GP’s relevant Local Health Board in each of Scotland and Wales), GPs are also subject to regular reviews by the Circle hospital where they treat patients.

If you are seeing a GP at one of our facilities, your relationship with your GP is separate from your relationship with Circle. As independent practitioners, GPs are personally responsible for the care they provide at Circle facilities. All GPs are required to maintain adequate levels of medical malpractice indemnity cover and we conduct audits to ensure that such cover is in place at all times.

Some GPs will invoice you directly for your appointment. However, there will also be occasions where Circle invoices you for your GP appointment (including where Circle is engaging GPs on a sessional basis). In these circumstances, Circle is acting as an agent for your GP in collecting those fees; the GP remains an independent medical practitioner and is responsible for the care you receive.

Competition and Markets Authority (CMA)

In 2014, the Competition and Markets Authority (CMA) issued an Order (“**CMA Order**”) regulating the relationships between private hospitals and consultants, including GPs who treat private patients or refer them for tests at Circle facilities pursuant under the Practising Privileges framework (“**Referring Clinicians**”).

In accordance with the CMA Order, hospital operators are prohibited from offering any incentive scheme or arrangement, whether legally enforceable or not, or incentive, which is intended to induce or may be reasonably regarded as inducing Referring Clinicians to refer private patients to, or treat private patients at, their facilities. Circle 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 common arrangements Circle has with Referring Clinicians. Further details are also available on our individual hospital webpages.

Higher Value Services

We charge our Referring Clinicians for using consulting rooms at our hospitals and any secretarial services we provide to them.

The charges applicable at each of our hospitals are disclosed via our individual hospital webpages. We offer a 25% discount to Referring Clinicians who opt to pay for use of consulting rooms on a monthly direct debit arrangement, where Referring Clinicians commit to using a room at a hospital on a regular basis for a minimum of 12 months. No reduction or refund is extended for consultant

holiday or sickness or where a patient fails to attend their booked appointment.

We assess an annual charge to our 'Connected Doctors', who rely on Circle to provide certain appraisal and other professional credentialing services. This charge covers access to the L2P appraisal system used by Circle Health Group and to our in-house e-learning system.

Lower Value Services

We provide a number of support services to our Referring Clinicians, for which we do not charge. These include:

- Support with various services provided to ensure clinical safety, including in-house training, and operational services such as patient admission, administrative services and billing
- Basic workplace amenities, including free tea and coffee, subsidised meals provided on-site, stationery and, parking spaces (to the extent that they are available to all staff and persons working at the hospital generally)
- General marketing support, such as consultant directories and promotional events, including access to third-party online platforms providing consultant profiles and appointment-booking. These third-party platform services are akin to directory services and access to such platforms is open to all consultants at Circle hospitals.

General corporate hospitality

We arrange training and information events for Referring Clinicians and local GPs. Such events are an effective way to enhance their understanding about both our hospitals and some of the specialist services we provide. No payments are made for attending these events, although refreshments are provided, and we sometimes use (and pay for) external venues when there is insufficient space for this type of event at the relevant hospital. Sometimes we hold networking events which may be held off-site (such as at a football or rugby game). Some hospital or corporate managers may also invite Referring Clinicians to discuss options for developing the hospital or Circle business and these may be held over dinner.

A description of, and the cost of providing, any specific corporate hospitality events can be found on our individual hospital webpages.

Further Information

If you have any questions regarding our arrangements with Referring Clinicians, please contact us by email at corporate.compliance@circlehealthgroup.co.uk.

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