

## The Winterbourne Hospital

### ***Introduction***

Consultants are critical to each Circle Health Group hospital. 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 hospitals and consultants who have Practising Privileges or treat private patients or refer them for tests at private facilities (“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 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 this hospital.

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

We charge our Referring Clinicians £20 per hour for using consulting rooms at our hospital.

Referring Clinicians whose private secretaries use space at the hospital are charged £10 hour which covers ad hoc desk use, postage and telephone calls.

### ***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 webpage [here](#).

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

At this hospital, we provide general corporate hospitality as detailed on our corporate webpage [here](#).

In addition to the arrangements detailed on our corporate webpage, we invite members of our hospital Medical Advisory Committee and a selection of other Referring Clinicians to an annual dinner. The hospital Executive Director and Director of Clinical Services along with

other senior managers attend the annual dinner. The dinner approximately costs £100 per person.

Our hospital also holds specialty dinners at intervals during the year with groups of Referring Clinicians as information gathering and sharing events. All Referring Clinicians are invited, and the average cost is approximately £45 per head.

### ***Financial Interests***

There are no Referring Clinicians with financial interests in equipment used or services and facilities operated within or at our hospital.

### ***Services Arrangements***

There are no service arrangements between Referring Clinicians and our hospital.

### ***Clinical Chair***

Dr Hay-Ming Blunt, General Practitioner, is the Clinical Chair of the hospital. Dr Hay-Ming Blunt's role includes chairing hospital Clinical Governance Committee meetings and attending the hospital's Senior Management Team meetings. Dr Hay-Ming Blunt is paid £13,000 per year for these services. 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).

*April 2026*