



Cabinet Office

CARBON REDUCTION PLAN GUIDANCE

Notes for Completion

Where an In-Scope Organisation has determined that the measure applies to the procurement, suppliers wishing to bid for that contract are required at the selection stage to submit a Carbon Reduction Plan which details their organisational carbon footprint and confirms their commitment to achieving Net Zero by 2050.

Carbon Reduction Plans are to be completed by the bidding supplier¹ and must meet the reporting requirements set out in supporting guidance, and include the supplier's current carbon footprint and its commitment to reducing emissions to achieve Net Zero emissions by 2050.

The CRP should be specific to the bidding entity, or, provided certain criteria are met, may cover the bidding entity and its parent organisation. In order to ensure the CRP remains relevant, a Carbon Reduction Plan covering the bidding entity and its parent organisation is only permissible where the detailed requirements of the CRP are met in full, as set out in the Technical Standard² and Guidance³, and all of the following criteria are met:

- The bidding entity is wholly owned by the parent;
- The commitment to achieving net zero by 2050 for UK operations is set out in the CRP for the parent and is supported and adopted by the bidding entity, demonstrated by the inclusion in the CRP of a statement that this will apply to the bidding entity;
- The environmental measures set out are stated to be able to be applied by the bidding entity when performing the relevant contract; and
- The CRP is published on the bidding entity's website.

Bidding entities must take steps to ensure they have their own CRP as soon as reasonably practicable and should note that the ability to rely on a parent organisation's Carbon Reduction Plan may only be a temporary measure under this selection criterion.

The Carbon Reduction Plan should be updated regularly (at least annually) and published and clearly signposted on the supplier's UK website. It should be approved by a director (or equivalent senior leadership) within the supplier's organisation to demonstrate a clear commitment to emissions reduction at the highest level. Suppliers may wish to adopt the key objectives of the Carbon Reduction Plan within their strategic plans.

¹Bidding supplier or 'bidding entity' means the organisation with whom the contracting authority will enter into a contract if it is successful.

²Technical Standard can be found at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/991625/PPN_0621_Technical_standard_for_the_Completion_of_Carbon_Reduction_Plans__2_.pdf

³Guidance can be found at:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/991623/Guidance_on_adopting_and_applying_PPN_06_21__Selection_Criteria__3_.pdf

A template for the Carbon Reduction Plan is set out below. Please complete and publish your Carbon Reduction Plan in accordance with the reporting standard published alongside this PPN.

Carbon Reduction Plan

Supplier name:Circle Health Holdings Ltd.....

Publication date:13th November 2025.....

Company Structure

Circle Health Holdings Ltd, Registration 10543089, for the purposes of this document includes but is not limited to the following Healthcare premises:

Company and Registration Number

CHG Management Services Ltd 05042771
Circle Health Group Ltd 02164270
Circle Hospital (Reading) Ltd 06995585
Circle Rehabilitation Services Ltd 10527747
Circle Clinical Services Ltd 07714059
BMI Three Shires Hospital LLP OC398963
BMI Southend Private Hospital Limited 05155289
BMI Syon Clinic Limited 05706302
BMI Imaging Clinic Limited 05706274
Mount Alvernia PET CT Limited 05750788
The Pavilion Clinic Limited 06061941
Meriden Hospital Advancing Imaging Centre Limited 05607465
North West Cancer Clinic Limited 05706220

Commitment to achieving Net Zero

Circle Health Group is committed to halving its emissions intensity by 2030 and achieving net zero emissions by 2040.

Baseline Emissions Footprint

Baseline emissions are a record of the greenhouse gases that have been produced in the past and were produced prior to the introduction of any strategies to reduce emissions.

Baseline emissions are the reference point against which emissions reduction can be measured.

Baseline Year: 2022	
Additional Details relating to the Baseline Emissions calculations.	
<p>Circle Health Group maintains a commitment to transparent and accurate reporting of greenhouse gas (GHG) emissions. In 2024, the organisation undertook a comprehensive review of its GHG inventory to establish a revised emissions baseline that reflects post-pandemic business-as-usual operations and current service levels. The updated baseline supports a more representative foundation for long-term decarbonisation planning.</p> <p>Corporate GHG emissions have been calculated in accordance with the Greenhouse Gas Protocol Corporate Accounting and Reporting Standard. Activity and spend-based data have been applied as appropriate, using emission factors published by UK DEFRA, DESNZ, and the US EPA. The 2024 GHG inventory has undergone external assurance to provide increased confidence in data quality, completeness, and methodological application.</p> <p>As part of this process, 2022 emissions were recalculated to ensure comparability with the updated methodology and data boundaries. The comparison indicates a reduction in total carbon intensity of approximately 26% between 2022 and 2024. This change reflects a combination of improved data granularity, updated emission factors, and refined Scope 3 category coverage. The 2024 footprint includes expanded Scope 3 reporting, encompassing employee commuting, investments, and fuel- and energy-related activities, alongside updated procurement data and activity metrics.</p> <p>The new emissions baseline forms the basis of Circle Health Group’s current decarbonisation roadmap. The roadmap is structured using science-based principles and prioritises measures according to operational feasibility and material emissions impact.</p>	
Baseline year emissions: 2024	
EMISSIONS	TOTAL (tCO₂e)
Scope 1	21,879
Scope 2	10,703
Scope 3 (Included Sources)	136,934
Total Emissions	169,516

Current Emissions Reporting

Reporting Year: 2024	
EMISSIONS	TOTAL (tCO ₂ e)
Scope 1	21,879
Scope 2	10,703
Scope 3 (Included Sources)	136,934
Total Emissions	169,516

Greenhouse Gas (GHG) Emissions:

- **Scope 1:** Direct emissions from owned or controlled sources.
- **Scope 2:** Indirect emissions from the generation of purchased energy.
- **Scope 3:** All other indirect emissions, including supply chain and patient travel.

Emissions breakdown and comparison

(Units: tCO₂e)

Scope	Category	2022	2024
1	Sub-total	23,141	21,879
	Fugitive emissions	355	1,107
	Mobile combustion	938	900
	Stationary combustion	12,337	11,877
	Anaesthetic gases	9,511	7,994
2	Sub-total	10,042	10,703
	Purchased energy	10,042	10,703
3	Sub-total	203,137	136,934
	Purchased Goods and Services	150,751	88,004
	WTT - Mobile combustion	No data	219
	WTT - Stationary combustion	No data	1,984
	WTT - Purchased energy	919	2,578
	Waste	234	920
	Business travel	900	2,098
	Employee commuting	No data	8,355
	Patient travel	47,430	30,986

Scope	Category	2022	2024
	VC transport	2,903	1,501
	Investments	No data	289

Emissions reduction targets

Circle Health Group is committed to achieving Net Zero GHG emissions across all scopes by 2040. Residual emissions would be neutralised through permanent carbon removals which will be managed by our parent company, Pure Health, at group-level.

To support this long-term goal, Circle Health will also commit increasing our renewable electricity uptake and halving our emissions intensity by 2030 from a 2024 base year.

Carbon Reduction Projects

Completed Carbon Reduction Initiatives

CHG have implemented the following initiatives in 2024:

1. National Senior Stakeholder Sustainability Committee with representation of all organisational functions including commercial, operational, estates, procurement, finance, clinical, people, communications and IT with clear governance reporting to board on a quarterly basis
2. Sustainability Champions at 75% of all sites
3. Integration of sustainability KPIs into executive remuneration and divisional scorecards.
4. 44% reduction in use of Nitrous Oxide use
5. All nitrous oxide delivered via canisters, cessation of manifold piped gas.
6. 95% LED lights fitted in all hospital sites, clinics, offices and decontamination sites.
7. Monthly sustainability reports including waste, water, energy consumption data shared with all hospital, clinic and decontamination site senior management teams
8. All staff have access to a dedicated learning space and online resources on how to reduce environmental impact at work.
9. Introduction of sustainability criteria for all procurement decision making and tendering
10. CPPA exploration commenced for electricity consumption
11. National energy saving campaign launched
12. Dedicated Head of Sustainability appointed September 2024 and Sustainability Project Manager appointed October 2024
13. EV charging now at 26 sites

Future Carbon Reduction Initiatives

The organisation is progressing decarbonisation across eight strategic levers, prioritised by feasibility, operational impact, and emissions reduction potential. A summarised view of our focus areas is provided below:

- **Low-Carbon Clinical Practices** – *Reducing emissions and waste in surgical care*
 - Embedding the Royal College of Surgeons Green Theatre Checklist across surgical pathways
 - Reducing high-emission anaesthetic agents such as nitrous oxide
 - Increasing adoption of reusable or lower-waste clinical products where clinically safe and appropriate
- **Decarbonise Logistics and Travel** – *Lowering transport and fuel emissions*
 - Monitoring fleet performance and replacing vehicles in line with natural renewal cycles
 - Supporting uptake of lower-emission vehicles for operational and staff travel
- **Smart and Efficient Buildings** – *Optimising energy use and infrastructure performance*
 - Implementing occupancy-based and automated lighting controls
 - Building management system optimisation and minor energy efficiency upgrades
 - Encouraging behavioural energy-saving initiatives among staff
 - Exploring renewable energy uptake through existing procurement arrangements
- **Culture, Capability and Governance** – *Strengthening workforce engagement and sustainability oversight*
 - Appointing site-level sustainability champions across the remainder of our sites
 - Establishing governance committees to oversee local sustainability initiatives
 - Developing staff awareness and training programmes to embed sustainability in daily operations
 - Targeted communication and engagement initiatives to reinforce alignment from executive leadership to frontline staff

Declaration and Sign Off

This Carbon Reduction Plan has been completed in accordance with PPN 06/21 and associated guidance and reporting standard for Carbon Reduction Plans.

Emissions have been reported and recorded in accordance with the published reporting standard for Carbon Reduction Plans and the GHG Reporting Protocol corporate standard⁴ and uses the appropriate Government emission conversion factors for greenhouse gas company reporting⁵.

Scope 1 and scope 2 emissions have been reported in accordance with SECR requirements, and the required subset of scope 3 emissions have been reported in accordance with the published reporting standard for Carbon Reduction Plans and the Corporate Value Chain (Scope 3) Standard⁶.

This Carbon Reduction Plan has been reviewed and signed off by the board of directors (or equivalent management body).

Signed on behalf of Circle Health Group:

A handwritten signature in blue ink, appearing to be 'Jawad Khan', written over a faint blue rectangular box.

Jawad Khan, Chief Financial Officer

Date: 9th December 2025

⁴<https://ghgprotocol.org/corporate-standard>

⁵<https://www.gov.uk/government/collections/government-conversion-factors-for-company-reporting>

⁶<https://ghgprotocol.org/standards/scope-3-standard>