



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.

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.

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

Carbon Reduction Plan

Completed using PPN-0621 technical standard and guidance 2019

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

Publication date:31 July 2024

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	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 Holdings Limited is committed to achieving net zero by 2035 for scopes 1 and 2 and net zero for scope 3 by 2045.

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: 2020

Additional Details relating to the Baseline Emissions calculations.

The base year was calculated with support of an external consultant using all available data at that time. The 2020 year however was interrupted by the COVID19 pandemic and therefore the outputs were affected by this.

Any gaps identified at that time have been subsequently updated when data became available.

Circle Health Group	
GHG Baseline Reporting Year	2020
Total number of sites	54
	2020 Base Year
Scope	Tonnes tCO₂e Total
Scope 1 Total Emissions	21,201
Company Facilities Total	20,435
Natural Gas	13,844
Coal	851
Gas Oil	193
Fuel Oil	179
LPG	14
F-gas in Facilities	216
F-gas N ₂ O for medical use	2,906
F-gas PFCs for medical use	2,232
Company Vehicles Total	766
Diesel	758
Petrol	8
Vehicle LPG	0.2
Scope 2 Total Emissions	11,701
Grid Electricity	11,701
Scope 3 Total Emissions	99,884
Cat 1 - Purchased goods & services	93,701
Cat 3 - Fuel & energy related activities	3,369
Cat 5 - Waste generated in operations	2,661
Cat 6 - Business travel	153
Scope 3 Emissions (Downstream)	0
Total emissions/GHG baseline footprint	132,786

Since the initial footprint, improved data collection and collation has been implemented to resolve gaps in these areas, including 2020 data for medical F-gas, business travel, and correct data for 2020 other medical gases (nitrous oxide, CO₂ and propane). These totals have been updated as part of the review exercise.

In terms of annual accounting reporting under SECR, these reports do not include the FGAS emissions and some other scope 3 categories therefore the report is not consistent with the data provided here. It is however consistent in data collation to report year on year comparison.

Base year emissions:

EMISSIONS	TOTAL (tCO₂e)
Scope 1	21,201
Scope 2	11,701
Scope 3 (included categories as above)	99,884
Total Emissions	132,786
tCO₂e per £million revenue	133

Current Emissions Reporting

Reporting Year: 2023	
Additional Details relating to the Baseline Emissions calculations.	
<p>A full footprint has not been completed in 2022 as it follows the data build up required for consistent SECR reporting, and the figures below are derived as follows:</p> <ul style="list-style-type: none"> • Scope 1 & 2 primary energy data as used for SECR and ESOS • Scope 1 F-gas in air conditioning primary data from re-gas records • Scope 1 F-gas for medical use primary data from purchasing • Scope 1 N₂O & other medical gases uplifted from 2021 figures in line with revenue • Scope 3 purchased goods and services uplifted slightly below revenue increase to reflect increased supplier costs over and above higher level of procurement • Scope 3 waste uplift in line with revenue • Scope 3 business travel data from expenses (comparable with 2020 data) 	
EMISSIONS	TOTAL (tCO₂e)
Scope 1	19,389
Scope 2	11,665
Scope 3 (Sources as above)	107,424
Total Emissions	138,478
tCO₂e per £million revenue	115

Emissions reduction targets

Circle Health is continuing to grow, and therefore to progress towards Net Zero, we have adopted an emissions intensity approach using tCO₂e per £million revenue. The objective for Net Zero in scope 3 is to reach 95% reduction compared to base year intensity with the remaining mitigated through verified insetting within the value chain or offsetting where this is not possible.

The base year emissions intensity was 133 tCO₂e/£million.

2023 saw a continued uplift in activity throughout the estate but in contrast, a slight and continuing drop in total emissions from 2022. As there were additional requirements with increased associated energy consumption to service the estate, along with improvement projects delivered as part of our overall investment plan, the pace of emissions reduction is steady with the emissions intensity reducing to 115 tCO₂e/£million, a fall of 18 tCO₂e/£million from the baseline year.

Procurement emissions intensity used in the calculations from 2021-22 is not a fair reflection due to use of spend-based estimation which has been distorted by increased cost of products and services without any associated increase in emissions associated with most products. Further work is needed to obtain primary data from suppliers to allow accurate monitoring of procurement-associated emissions and we will look to reset our baseline data in line with a 5 year review strategy for 2025 reporting purposes.

Carbon Reduction Projects

Completed Carbon Reduction Initiatives

The following environmental management measures and projects have been completed or implemented since the 2020 baseline. The measures will be in effect when performing the contract.

- Improved air conditioning maintenance to minimise F-gas leaks and improve energy efficiency
- TM44 Air conditioning inspections and improvements
- Progressive replacement of fluorescent lights with LED across all sites
- Monthly communication with all sites via Environmental Performance Pack which shows relative energy consumption and waste production (vs GIA) between hospitals. This is used to support site staff to explore their energy consumption and identify equipment management and behaviour change opportunities for immediate reduction as well as longer term projects for consideration.
- Optimisation programme in place for Building Management Systems across less efficient buildings to improve efficiency.
- 100% reduction in Desflurane usage
- Phasing down of N₂O anaesthetic except for paediatrics and specific procedures, removing from manifolds and using localised delivery
- EV charging installed at 19 sites (currently for visitor and occasional staff vehicles, prerequisite for reviewing fleet)

Future Carbon Reduction Initiatives

In the future we anticipate that we will implement further measures such as:

- Improvement of Energy Performance Certification of hospital buildings.
- Complete LED replacement program across remaining areas of sites
- Complete optimisation programme across all Building Management Systems to improve building heating cooling and ventilation efficiency.

- EV charging at remaining sites and review of opportunities for EV fleet
- Once nationwide availability of sustainable HVO is secure, replace all diesel in generators with HVO
- Replace and consolidate older commercial boiler systems with modern systems to reduce both energy consumption and minimise losses.
- Replace or refurbish old window units to improve heat retention in winter and reduce solar gain in summer, both reducing energy consumption
- Replace roofing systems that are at end of life with systems offering increased insulation value to the property with reduced thermal losses.
- Explore gas capture systems for theatre extract systems to recover anaesthetic gases for recycling and prevent emissions
- Engage with suppliers regarding their own emissions reduction programmes and look to include in performance management for key contracts
- Holistic review of waste and procurement to develop a resource circularity approach which minimises waste through pro-active sourcing and ensures the highest proportion of waste practically possible for a hospital site is recycled.

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 the Supplier:



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Date: 31 July 2024

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>