

Sustainability report

We are a progressive, sustainable business

We want to become recognised as a leader in sustainability in our industry. Through our sustainability strategy we seek to create value in the workplace, our local communities and the environment.



What sustainability means to Spire Healthcare

Sustainability is a core component of Spire Healthcare's strategy and operations. Our ability to succeed today and plan for tomorrow depends on us being able to positively contribute towards enhancing the world for current and future generations. As an independent healthcare company, we have an important societal role to play as our delivery of people's care contributes to the health of the nation and benefits society.

As we execute our strategy, we seek to take a long-term view, whether that is through the investments we make in our colleagues, hospitals, clinics and services, or our interactions with the communities that we serve. We aim to develop a business that is fit for purpose now and capable of providing lasting impact in the future.

Over 35 years ago, the United Nations Brundtland Commission introduced the concept of sustainable development and described how it could be achieved. It defined sustainability as 'meeting the needs of the present without compromising the ability of future generations to meet their own needs'. This definition has stood the test of time and underpins Spire Healthcare's approach to sustainability.

We believe that acting conscientiously as a business and investing responsibly to achieve positive social and environmental outcomes, are critical to the long-term success of Spire Healthcare.

How we make an impact and add value

We will deliver on our ambition to be a sustainability leader by focusing on our purpose, 'making a positive difference to people's lives through outstanding personalised care', which is implemented through our strategy and engagement with our stakeholders. The implementation of our purpose and strategy is supported by our values. All of this is enabled by our sustainability strategy. There are three elements to the strategy:



Respect the environment

We are committed to minimising the environmental impact of our operations and maintaining the group's resilience to environmental risks and impacts.



Engage our people and communities

We're a people business. By hiring talented people and providing an environment in which to grow and develop their careers, our patients and the communities with whom we interact, and society at large, will benefit.



Operate responsibly

We aim to operate to the highest standards in everything we do, ensuring honesty, integrity, proper governance and compliance at all times. We promote an ethical culture across the group.

* The sustainability strategy covers Spire Healthcare Limited only at this stage; we anticipate working to bring the rest of the group under the same plan.

How we support the United Nations Sustainable Development Goals

The United Nations Agenda 2030 is underpinned by 17 Sustainable Development Goals (SDGs) that were ratified by UN Member Countries in September 2015.

The SDGs together form a roadmap for global prosperity that can only be achieved with a concerted global effort led by national governments and supported by non-governmental organisations, civil society and business enterprises.

As a leading corporation in UK healthcare, Spire Healthcare is committed to the UN's SDGs and, where possible, we map our sustainability activities to them. Our long-term success depends on

responding to the needs of all our stakeholders and the world around us. The SDGs have helped us understand how our objectives and targets align to broader global issues and have shown us where we can make a positive impact on society.

We apply our expertise, skills and ambition to drive the group's contribution towards the achievement of the eight SDGs where we can provide the greatest impact to society:

How we manage sustainability

Responsibility for approving Spire Healthcare's sustainability strategy and overseeing its delivery rests with the board of directors. Regular progress updates are provided at board meetings. Our chief financial officer (CFO) oversees delivery of the sustainability strategy at a business level, while our executive committee tracks progress towards the group's sustainability targets on an ongoing basis throughout the year.

Our sustainability goals, timelines and KPIs

This table is a summary of Spire Healthcare's current and high priority sustainability-related goals, mapped to the SDGs. The following pages provide further detail on these goals, the actions we are taking to achieve them, together with relevant timelines and KPIs where appropriate.



Respect the environment

7 AFFORDABLE AND CLEAN ENERGY
Providing affordable, reliable, and sustainable energy for all. Promoting international cooperation to provide access to advanced clean energy technology.

12 RESPONSIBLE CONSUMPTION AND PRODUCTION
Ensuring sustainable consumption and production patterns. Controlling our resource use and managing waste through policies and cooperation.

13 CLIMATE ACTION
Acting immediately to fight the climate crisis and adapt to the impact. Promoting awareness, policy change and support for vulnerable countries and states.



Engage our people and communities

3 GOOD HEALTH AND WELL-BEING
Ensuring everyone leads healthy lives, physically, mentally and emotionally. Lower mortality rates. Promoting health and wellbeing.

4 QUALITY EDUCATION
Providing quality, equal and free education to all girls and boys. Making sure adults get access to further education and training. Increasing number of quality teachers.

5 GENDER EQUALITY
Achieving gender equality for all girls and women in the world. Ending discrimination and violence against women. Promoting women's wellness and access to health care.

8 DECENT WORK AND ECONOMIC GROWTH
Achieving sustainable economic growth and protection for fair, safe and decent employment. Preventing slavery and child labour.



Operate responsibly

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16 PEACE, JUSTICE AND STRONG INSTITUTIONS
Building peaceful, inclusive societies with law and accountability at all levels. Ending violence, trafficking and corruption.

Having launched our sustainability strategy in mid-2022, we established a cross-functional internal sustainability committee in 2023, chaired by our CFO, and bringing together 15 members from across the business. Our previous workforce and sustainability committee joint structure has been split in two to give proper attention to each area. The sustainability committee reports to the executive committee, and acts with delegated authority. It meets every two months to share progress on delivering actions and meeting targets and explore initiatives that will accelerate our progress and identify associated risks and opportunities.

The main roles and responsibilities of the sustainability committee are to:

1. Oversee, review and advise the executive committee on the company's strategies, objectives and commitments related to sustainability and environmental, social and governance (ESG) factors
2. Oversee, review and recommend changes to Spire Healthcare's sustainability-related goals, objectives, commitments and key performance indicators and monitor the company's progress against the same

15

members of the sustainability committee from across the business







Sustainability report continued

Our sustainability goals, timelines and KPIs

This table is a summary of Spire Healthcare's current and high priority sustainability-related goals. The following pages provide further detail and the actions we are taking, together with relevant timelines and KPIs where appropriate.










Respect the environment

Goal	SDG	Page
1 Attain net zero carbon status by the end of 2030 – includes carbon emissions, energy use and capital investment	 	39
2 Manage our waste more efficiently while minimising detrimental effects to our planet		42
3 Undertake a comprehensive review of climate risk across our operations		43
4 Identify opportunities to reduce use of single-use plastics		43
5 Identify and act on water-saving opportunities		44



Engage our people and communities

Goal	SDG	Page
6 Be a contributor to the UK's healthcare workforce through innovative programmes		44
7 Take action to ensure that the ethnic diversity of Spire Healthcare's leadership reflects, or is ahead of, the overall ethnic diversity of the business as a whole	 	45
8 Achieve a gender balance of at least 40% female representation at board and executive committee level by 2025		46
9 Further reduce gender pay gap among Spire Healthcare colleagues		47
10 Maintain an overall colleague engagement score of at least 80%		48
11 Build strong connections between Spire Healthcare hospitals and local communities		49



Operate responsibly

Goal	SDG	Page
12 Target 'Good' / 'Outstanding' or equivalent scores in England, Scotland and Wales across all inspected sites	 	50
13 Target all Spire Healthcare hospitals to achieve a rating of at least 80% across: – Colleague experience – Patient experience – Consultant experience		50
14 Maintain robust standards of clinical and corporate governance in line with best practice	 	51
15 Promote an open and learning culture	 	51
16 Further develop our approach to controls around modern slavery		52
17 Maintain and strengthen information governance and data security		53



Respect the environment

Attain net zero carbon status by the end of 2030

Timeline

End 2030

KPI

tCO₂e emissions in line with our decarbonisation plan – 3% ahead of target in 2023 (2022: 9% ahead)

Net zero target includes full Scope 1 and 2 emissions and Scope 3 emissions from air and rail travel

Initiatives

- Continuing LED replacements
- Optimisation of Building Management Systems (BMS)
- Replacement of remaining gas-powered primary steam boilers at Spire Claremont
- Removal of the remaining piped nitrous oxide across the estate
- Further PV installations and thermal upgrades as part of roofing replacements
- Completion of the EV charging point roll-out across the hospital estate
- Use of electric vehicles in the group's fleet

1



Progress in 2023

Our 10-year carbon reduction target

Our work continues to reduce the harmful impact of climate change on our planet through a robust decarbonisation strategy and delivery programme that is designed to achieve net zero carbon emissions (Scope 1 and 2), and elements of Scope 3, by 31 December 2030¹. We were the first independent healthcare provider to make such a commitment. Our dedicated investment to help achieve this aim by 2030 continues with a £12.2 million commitment in 2024 to install solar PV panels at every hospital and upgrade all hospital Building Management Systems (BMS).

Our underlying strategy continues to prioritise a targeted approach to reduction from the greatest carbon emission sources, for example by installing LED lighting throughout all our buildings, removing the remaining inefficient gas-powered primary steam boilers and piped nitrous oxide across the estate, and optimising the use of our buildings' fixed plant and equipment to ensure we maximise both energy and operational efficiencies.

We continue to engage, empower and support the Carbon Champions we have at each of our hospitals. They play a key role in helping us meet our net zero objective by promoting, coordinating and delivering carbon management improvement at a local level. Through the implementation of their audits and action plans, we realise greater efficiencies across the group to further support our carbon reduction targets and strategy, as well as our operational savings objectives.

1. The trajectory to net zero by 2030 and figures presented here exclude VHG; we will look to integrate our plans going forward.

Measuring our performance

We use the intensity metric of carbon emissions per £ revenue, which increases in proportion to the growth of our business.

If revenue grows and intensity figures reduce, this will demonstrate that we are becoming less reliant on carbon.

Our carbon reduction roadmap

We have mapped out our carbon reduction plans to net zero in 2030, using 2019 as our reference base year. The projected waterfall diagram has been updated from 2023 to reflect Spire Healthcare's current energy procurement strategy and continued use of brown electricity until at least 2025. The overall reduction target remains unchanged and we continue to reduce our carbon emissions in line with target.

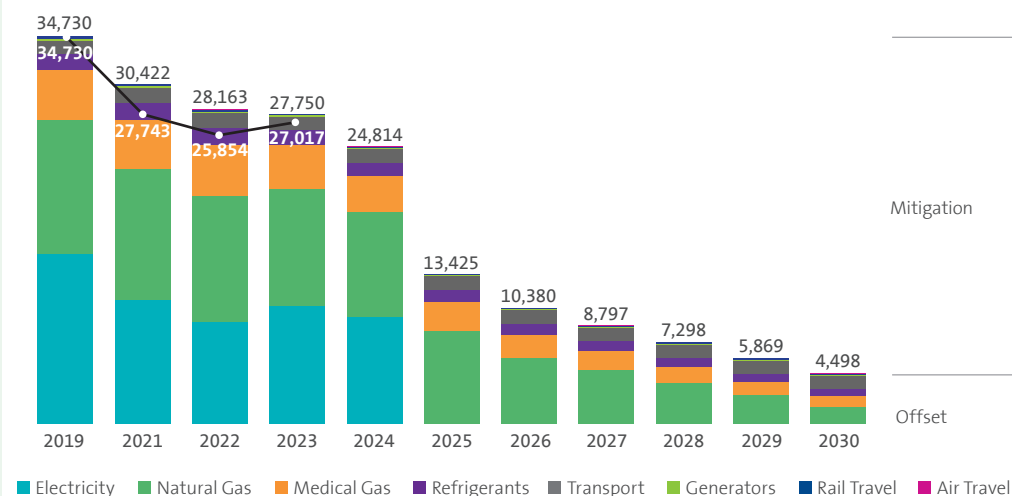
The reduction to date has been achieved through:

- Monitoring and targeting utility benchmarking reports which are issued monthly to our sites
- Reviewing half-hourly energy consumption data and heat maps for each of our hospitals to identify energy efficiency and cost saving opportunities
- Targeted and informed investment in low carbon infrastructure and heat recovery, including LED lighting technology across the estate and end-of-life replacement of fixed engineering and building services plant and equipment with the most efficient technology available

Our emissions in 2023 were 27,017 tCO₂e, against a target of 27,750 tCO₂e (3% ahead of target).

This excludes Scope 3 emissions included in our 2023 greenhouse gas emissions data shown on page 40 from electricity transmission (1,051 tCO₂e), waste 117 tCO₂e, and hotels (41 tCO₂e).

Spire Healthcare net zero carbon emissions (tCO₂e) plan



Sustainability report continued

Energy monitoring

Business utility and sustainability consultancy Inenco produces quarterly performance reports that chart our results against our carbon reduction targets. We also separately monitor our hospitals on a monthly basis, and issue energy reports detailing their utilities' consumption and benchmarking them against similar-sized hospitals within the group. The reports include dashboards at site and group-level, detailing year-on-year performance. Our regional engineering team audits and monitors our hospitals' carbon reduction action plans as part of our annual compliance auditing programme.

50-60%

new LED light fittings are
50% to 60% more energy efficient

Capital investment in low carbon infrastructure

We continue to invest in our estate and engineering infrastructure to improve our energy efficiencies. Key projects in 2023 included:

- Continuing replacement of gas-powered primary steam boilers within the estate with more efficient electrically powered heating plant and equipment at Spire Claremont in Sheffield
- Replacement of a central chiller plant incorporating and utilising heat recovery into our hot water systems at Spire Gatwick and Spire Leeds
- Continuing to replace the remaining 10% of older lighting across the hospital estate with LED fittings that are 50% to 60% more energy efficient
- Installation of roof and ground mounted photo-voltaic (PV) solar panels at Spire Murrayfield, Wirral that will generate up to 12% of the hospital's electricity when completed in Q1 2024
- Pipework and ducting insulation upgrades and replacement of old inefficient single-glazed windows as requested by Carbon Champions at Spire Alexandra in Kent, Spire Hull and Spire Little Aston in the West Midlands

Alongside these investments, our Carbon Champions continue to receive training and guidance to help them produce local action plans and identify opportunities for operational improvements and efficiencies. Their action plans are reviewed twice-yearly to monitor and track progress.

Legislation

Since becoming a publicly listed company in 2014, Spire Healthcare has discharged its responsibilities under the government's CRC Energy Efficiency Scheme, and we will continue to report on our energy consumption in line with the requirements of the upcoming Streamlined Energy and Carbon Reporting legislation.

Spire Healthcare was invited to participate in the CDP (formerly the Carbon Disclosure Project) again in 2023. We made our ninth annual submission to the CDP and received a 'B' grading for 2023, maintaining our previous 'B' rating, placing Spire Healthcare well above the market sector average of 'D', and demonstrating our knowledge and understanding of our impact on climate change issues.

Greenhouse gas emissions in 2023

This section provides the emissions data and supporting information required by the Companies Act 2006 (Strategic Report and Directors' Report) Regulations 2013 and the Companies (Directors' Report) and Limited Liability Partnerships (Energy and Carbon Report) Regulations 2018. Total greenhouse gas (GHG) emissions for Spire Healthcare for January to December 2023 were 28,226 tCO₂e. The table below shows this, broken down by emissions source.

We achieved emissions reduction of 3% ahead of our planned net zero target, but for our wider SECR/GHG obligations, we experienced a 4% increase year-on-year. The primary reason for this is the unexpected market increase in electricity emissions factor, influenced by global energy supplies and the war in Ukraine.

Emissions source	2019	2020	2021	2022	2023	Share %	YoY % change
Fuel combustion: stationary	12,098	11,590	12,539	10,943	10,943	39%	<1%
Fuel combustion: mobile	1,209	1,447	1,325	1,346	1,176	4%	-13%
Fugitive emissions	5,895	5,018	5,139	4,703	2,646	9%	-44%
Purchased electricity	15,193	13,330	9,802	9,837	13,202	47%	34%
Air travel				40	41	<1%	2%
Rail travel				40	59	<1%	48%
Hotel				75	41	<1%	-46%
Waste				106	117	<1%	10%
Total emissions (tCO₂e)	34,395	31,384	28,805	27,091	28,226	100%	4%
Revenue £m	980.8	919.9	1,106.2	1,199	1,359		13%
Intensity: (tCO₂e per £m)	35.1	34.1	26.0	22.6	20.76		-8%

Energy consumption by year (MWh)	2019	2020	2021	2022	2023	Share %	YoY % change
Natural gas	65,285	63,032	67,766	59,648	59,337	48%	-1%
Electricity	54,788	52,647	54,704	59,717	58,679	48%	-2%
Transport fuel	4,883	5,386	5,363	5,407	4,743	4%	-12%
Gas oil	374	369	384	212	340	<1%	60%
Total	125,330	121,434	128,217	124,984	123,099	100%	-2%



Sustainability report continued

Notes to the table:

Please note the figures reported for SECR include Scope 3 emissions from electricity transmission and distribution, hotel stays and waste. These emissions are not currently included in our annual targeted emissions and net zero roadmap. We aim to progress our Scope 3 reporting in 2024.

a. Scope 2 / purchased electricity emissions reporting

The figure for emissions from purchased electricity from October 2021 to March 2022 reflects our investment in a zero-carbon electricity tariff across all our sites and as such a market-based methodology was applied for this period. The remainder of these calendar years followed a location-based methodology. In 2023 we returned to adopting a location-based methodology across the whole year.

b. Footprint boundary

An operational control approach has been used to define the GHG emissions boundary, as defined in the Department for Environment, Food and Rural Affairs' latest environmental reporting guidelines: "Your organisation has operational control over an operation if it, or one of its subsidiaries, has the full authority to introduce and implement its operating policies at the operation." For Spire Healthcare, this boundary captures emissions associated with the operation of all our hospitals and other buildings such as clinics, offices, and our National Distribution Centre, plus company-owned and leased transport. Additionally, from 2022 this now also includes air and rail travel, hotel stays and waste.

c. Emission sources

All material Scope 1 and Scope 2 emissions are included, plus Scope 3 as required by SECR legislation. Additional data sets included that are over and above mandatory compliance include:

- Electricity transmission and distribution losses
- Emissions from air and rail travel
- Emissions from hotel stays and waste

d. Methodology and emissions factors

This information was collected and reported in line with the methodology set out in the UK government's Environmental Reporting Guidelines, 2019.

Emissions factors are taken from the Department for Business, Energy and Industrial Strategy emissions factor update published in 2023. There are no notable omissions from the mandatory Scope 1 and 2 emissions. 0% of emissions are based on estimated activity data.

e. Fugitive emissions

These are attributable to the use of refrigerants and medical gases (eg, carbon dioxide, nitrous oxide and Entonox).

Scope 3 emissions

The Scope 3 emissions stated in this section are in relation to electricity transmission and distribution, air and rail travel, hotel stays and waste. We recognise that this is not the full extent of our Scope 3 emissions, and have carried out a spend-based method for estimation. Using 2022 spend data it has been determined that 95% of our emissions are Scope 3 (for more information, including quantification of these emissions, please see page 80). In 2024 we plan to take steps to progress our Scope 3 reporting.

Engineering governance and compliance

To support the group's quality and patient safety agenda, the estate in which we operate must be monitored, maintained and developed appropriately to satisfy our goals and remain fit for purpose. Our property portfolio, engineering and health and safety governance sit under a common leadership provided by the estates and facilities directorate.

The identification, publication and management of risk associated with our estate and its operation is managed through annual audit alongside our clinical team. These audits are used to make this risk transparent, enabling a prioritised approach to risk mitigation. The resultant risk profile informs the business of future capital requirements, gives confidence that this capital is managed on a true risk basis and is targeted in the most efficient and effective way. The central estates team supplement the formal annual audits with regular routine visits that ensure our governance system is dynamic, with continual addition, closure and reassessment of risk. This, in turn, future-proofs the business.

Vita Health Group

Vita Health Group (VHG) started its sustainability journey two years ago and formed a working group to raise awareness of environmental matters, identify value impact measures and consider net zero. VHG does not own its estates which makes getting control over, and information about, emissions reductions, energy consumption data and preferred waste management arrangements more difficult.

However, in 2023, VHG reduced emissions, improved renewable energy consumption and developed a sustainable development plan covering key commitments including reaching net zero emissions in line with the government target of 2050, modelled to comply with the 1.5 degree pathway outlined in the 2015 Paris Agreement. This commitment will be submitted for Science Based Target Initiatives (SBTi) verification in 2024. The near-term target is to achieve a 42% absolute reduction in Scopes 1, 2 and 3 emissions by 2030.

Training and awareness raising for colleagues and internal champions began in 2024, along with a webinar from the Centre for Sustainable Healthcare, and VHG plans to apply for ISO 14001, an internationally agreed standard that sets out the requirements for an environmental management system.

The net zero strategy covers Spire Healthcare Limited only at this stage; we anticipate working to bring the rest of the group under the same plan.



Sustainability report continued



Respect the environment

Manage our clinical and non-clinical waste more efficiently while minimising detrimental effects to our planet

KPI

- Overall recycling 30% by end 2023 – 35%
- Hospital sites only dry mixed recycling 30% by end 2023 – 23.5%
- Offensive waste 40% by end 2023 – 36.5%

Initiatives

- Increased recycling rates through further segregation of waste and hazardous materials
- Worked to increase the percentage of offensive waste segregated into this waste stream
- Reduced infectious waste to 3% of total which lowered carbon emissions and cost, and helped remove offensive waste from incineration
- Working with current waste carrier to mitigate, where possible, waste going to landfill sites
- Trained 1,300 colleagues in waste segregation and training is now mandatory for all colleagues
- Recycling at 47 sites, up from 44 in 2022
- Expansion of reusable sharps containers

Progress in 2023

As a business, we generate a considerable amount of general waste – largely a combination of ‘domestic waste’, most of which generates renewable energy, and dry mixed recycling, which can be reused or repurposed. The group also disposes of clinical, infectious and offensive healthcare waste that requires specialist treatment, incineration or disposal through the renewable energy system. The challenge of managing and sorting such complex waste streams is unique to the healthcare sector.

Ensuring that we manage our waste properly, and recycle what we can, is vital for a healthcare business. It is all about doing the right thing, contributing to our carbon reduction programme, protecting the environment, and reducing costs.

It is important for our teams to understand the various types of waste and we have been rolling out in-house waste segregation training. By November 2023, just under 1,300 colleagues had been trained. The training is becoming mandatory for all colleagues in 2024 and we hope this will result in improved waste segregation and recycling outcomes. Although we incinerate less, prices have increased, so costs have not reduced in this area.

In 2023, Spire Healthcare’s waste management initiatives saved over 358 tonnes of CO₂. This is equivalent to:

- 1,194 trees planted each year or
- 134 cars off the road or
- 218 houses powered each year

If we combined our carbon savings for waste with our Scope 1 and 2 carbon savings, from 2019, this would equate to 28,852 trees planted, or 16 football pitches. We are now recycling at 47 sites, up from 44 in 2022.

Dry Mixed Recycling (DMR), (food waste and glass recycling) has been rolled out across the business (which includes plastic bottles, Vegiware cups and food trays, cans, etc) resulting in an improved DMR recycling figure of 23.5% at hospital sites only.

Most sites are now segregating disposable curtains and tray wraps, and we are investigating the feasibility of a ‘gloves off’ campaign to see if this waste can be removed from our clinical waste. We are also looking at removing or reducing disposable paper tissue roll use in many of our outpatient areas. Spire Healthcare continues to increase its overall recycling:

35%

overall waste recycled in 2023, up from 30% in 2022

This includes recycled waste returned to our National Distribution Centre.

23.5%

dry mixed waste recycled, up from 18% in 2022

This excludes National Distribution Centre waste and is at hospital sites only.

We have ‘offensive waste’ segregation at all our sites. Disposal of offensive waste, as bad as it sounds, costs more than 60% less, and uses a more environmentally friendly waste disposal process than clinical or infectious waste. It is not incinerated; instead, it goes to a special materials recovery facility, where it generates renewable energy, without releasing any harmful substances into the atmosphere. By encouraging segregation into offensive waste, we reduce our carbon emissions from having to incinerate clinical waste which should only include infectious and chemically contaminated types.

To help reduce our carbon footprint, the Sharps Bio System, designed by Stericycle, our waste partner, has been rolled out further across the estate. Stericycle’s containers are reusable UN-approved puncture-resistant containers that can be used up to 600 times after washing and disinfection, as opposed to the single-use sharps containers that are disposed of after just one use. The roll-out has taken a little longer than planned due to a lack of containers and materials in the UK but is due to be complete early in 2024.





Respect the environment

Undertake a comprehensive review of climate risk across our operations

Timeline End 2026

Initiatives

- Undertake scenario analysis of future climate warming scenarios in three years' time
- Consider further mitigation requirements for our facilities with higher risk from climate change

Progress in 2023

We engaged an expert advisory firm to conduct a scenario analysis to assess our climate risk. We set out the scenario, the analysis they conducted, and the outcomes that the models predict against our physical assets in our TCFD reporting on pages 75 to 80. The firm also advised us on the potential risks we face from an aggressive transition to a low carbon economy.

We considered the outcomes of their modelling and analysis at our audit and risk committee in November 2023. We recognise that:

- The scenario analysis undertaken is dependent on the quality and quantum of data we could provide to our expert for them to model (for example, we could give them high-quality data on our physical assets, but because we have experienced only minor impacts from adverse weather on our facilities, the financial impacts we could provide due to past heatwaves, floods and storm damage to predict future financial impacts is very limited)
- The scenario analysis is based on the current predictions of how the climate may evolve. As the actual impacts of climate change become more apparent and the models become more accurate, the predictions from these models will improve in reliability. We will repeat the scenario analysis in 2026 unless disclosure requirements or other factors mean we need to do it sooner

As an output from the analysis, we are following up on risks where the predicted impact at risk was higher, notably the potential impact of heat stress on our facilities.

 For more information, see our TCFD section [page 75](#)



Respect the environment

Identify opportunities to reduce use of single-use plastics

KPI

- Overall recycling 30% by end 2023 – 35%
- Hospital sites only dry mixed recycling 30% by end 2023 – 23.5%

Initiatives

- Plastic packaging, large cardboard and polystyrene is returned to Spire Healthcare's National Distribution Centre for baling and recycling
- Dry mixed recycling (DMR) continues to be rolled out across the business
- Plastic cutlery replaced with reusable or disposable items in all sites
- Working with waste treatment supplier to develop recycle initiative for single-use items

Progress in 2023


The use of plastics is a major environmental issue across the healthcare industry in the UK and globally. Plastic is a very versatile product for keeping medical equipment sterile, storage of clinically related products (eg drugs), and as an infection control barrier. It will take concerted effort across the global healthcare industry to develop new products that can replace the versatility of plastic over the medium to long term.

We are examining what steps we can take as a business to reduce our use of single-use plastics. To improve recycling, a baler was put in place at our National Distribution Centre to bundle large-scale plastic packaging such as linen wrapping or surgical packaging for recycling at a specialist provider.

In 2023, we replaced plastic cutlery with metal reusable or wooden disposable items and replaced plastic cups with paper ones. This year, we have been working with Veolia, a specialist waste treatment supplier, to enable us to start recycling single-use oxygen face masks, tubing and hard plastics in 2024.

In 2024 we will explore an initiative to turn our hard plastic waste into benches and planters that we can donate to local schools and parks.

Vita Health Group are committed to improving and aligning their waste management procedures with plans in the rest of the group.

 Read more in goal number two on [managing waste on page 42](#)



Sustainability report continued



Respect the environment

Identify and act on water-saving opportunities

KPI

Target of consumption m³ to be determined

Initiatives

- Making most efficient use of equipment
- Reducing low use outlets
- Leak detection
- Automatic meter reading

Progress in 2023

Water conservation

We continue to develop Spire Healthcare's strategic water management plan and in 2023 we achieved a reduction in both water and energy consumption without compromise to compliance and safety. Initiatives include:

- Analysing consumption per site to identify outliers and equipment efficiencies. After a trial at Spire Cheshire and Spire Fylde Coast in Blackpool, we have reduced the self-disinfection cycles of our endoscopy reverse osmosis systems from seven to four times a week, offering savings of 27,000 litres of water per annum
- Identification and safe removal of low-use outlets within our hospitals – eg a shower or tap that isn't regularly flushed through. This will be supplemented by external audits in 2024
- Automatic meter reading, which together with BMS optimisation and replacements, will improve our consumption monitoring capabilities and help to identify potential leaks or high usage. Our existing water contract has been rolled forward to May 2024; on renewal, the roll out of automatic meter reading can start

Development of the plan will continue in 2024, as we scope out opportunities in our central functions and areas of the business that have yet to be explored, such as catering and housekeeping.



Engage our people and communities

Be a contributor to the UK's healthcare workforce through innovative programmes

Initiatives

- Learning and development strategy
- Apprenticeship programmes including one of the largest nurse apprenticeship programmes in England
- Driving Clinical Excellence in Practice programme
- Range of leadership training programmes

Progress in 2023

Investing in our talented people is a major focus for us, as we seek to train and upskill colleagues, preparing them for a fulfilling and rewarding career at Spire Healthcare or elsewhere in the wider health and care sector.

Our apprenticeships and people development

We offer a range of training opportunities, supplemented by innovative programmes to help new and existing colleagues develop professional and leadership skills to further their careers. This year we launched our new Driving Clinical Excellence in Practice programme, which supports the continuing professional development of our registered nurses and allied health professionals.

Making almost full use of the UK Government's apprenticeship levy, we have over 430 apprentices in a range of clinical areas such as biomedical science, physiotherapy, medical laboratory technicians, and non-clinical disciplines such as marketing, human resources, engineering and business administration. The most significant is our nurse degree apprenticeship programme in England, run in partnership with the University of Sunderland, which combines study and assessments with on-site placements to gain practical knowledge. Read more in our strategy section on people on page 27.

We have delivered training to equip current and future leaders of our business. The learning and development team introduced a suite of Mastering Management modules with almost 1,400 delegates attending. Our GROW learning framework includes LEAP, for new managers or those coming into a leadership role; our Step Up Leadership Programme for our talented future leaders; our Stretch Leadership Programme for senior leaders; and our Operations Directors' Leadership Programme. The framework is moving us towards blended learning where colleagues are supported to take accountability for their own development and can choose from digital, class-based or webinar sessions. This approach ensures a strong succession pipeline.



For more information, see our TCFD section page 75, and 'Invest in our workforce' strategy section page 27





Engage our people and communities

Take action to ensure that the ethnic diversity of Spire Healthcare's leadership reflects, or is ahead of, the overall ethnic diversity of the business as a whole

Initiatives

- Consider ethnic diversity balance when constructing Spire Healthcare's leadership programmes
- Broad range of networks including mental health and wellbeing support, and for sexuality, racial equality, menopause, women, faith, carers
- Review external benchmarks eg Parker Review
- Working towards better data to improve reporting and planned action

Progress in 2023

During 2023, we have been reviewing this goal in line with the requirements of the Parker Review: 'Improving the Ethnic Diversity of Business', published in March 2023, to assess how best to support diversity in the business. Diversity remains vital to our success, and we were pleased to be listed in the Financial Times Diversity Leaders index for another year; this is an index of companies considered to be Europe's Diversity Leaders, based on a survey of 100,000 employees across Europe.

The group's executive committee demographic was 25% ethnically diverse in 2023 (2022: 25%) and the board is 8% ethnically diverse, unchanged from 2022.

We support the diversity of the business in various ways; we aspire to create an environment where everyone is respected and cared for, and where difference is celebrated.

Race Equality Network

To support our equity, diversity and inclusion strategy, we have networks supported by a member of the executive committee to give focus and impetus. Our Race Equality Network is a highly supportive and confidential colleague network that provides individuals from diverse backgrounds with a safe and open platform to share their personal experiences. The network has been active with regular meetings attended by colleagues and senior leaders, and communications updating colleagues on any actions taken and celebrating successes. We have introduced 'Diversity Toolkits' to encourage hospitals to promote key events and activities such as Race Equality Week, South Asian Heritage Month, and Black History Month, and support them to promote diversity and inclusivity at work. Regular catering events have also taken place to encourage colleagues to embrace each other's cultures and backgrounds.

The Race Equality Network has taken positive steps to engage with senior leaders and executive committee members during the year. It was also involved in the production of Spire Healthcare's annual Workforce Race Equality Standard (WRES) Action plan.

Understanding our workforce better

Colleagues are encouraged to share their ethnicity during the annual colleague survey to help Spire Healthcare better understand the different experiences of colleagues. The survey results are reported and shared nationally and locally, including the responses to questions on reporting instances of harassment, bullying, or abuse at work from patients, managers, and colleagues. The survey also asks whether colleagues believe that Spire Healthcare provides equal career progression and promotion opportunities, regardless of factors such as ethnic background, gender, religion, sexual orientation, disability, or age.

Of those colleagues who disclose their ethnicity in Spire Healthcare Limited, 18.9% report having a non-white background, up from 17.3% in 2022.

Vita Health Group has a positive action scheme in place to reduce barriers for people from ethnic minorities accessing employment; an interview is guaranteed if an applicant meets the criteria. Colleagues have been offered training in understanding micro-aggressions along with a pilot scheme for anti-racism training.



18.9%

report having a non-white background, of those colleagues who disclose their ethnicity, up from 17.3% in 2022

Headcount by ethnicity Spire Healthcare Limited

Asian	1,578
Black	549
Chinese	69
Mixed	226
White	10,492
Other	23
Not stated	2,070

Sustainability report continued



Engage our people and communities

Achieve a balance of at least 40% female representation at board and executive committee level by 2025

Timeline End 2025

KPI

- Proportion of female representation – 40% at board and executive committee combined
- Board diversity policy – agreed targets of a minimum 33% female directors on the board by the 2023 AGM and 40% by 2025

Initiatives

- FTSE Women Leaders Review – first in Health Care and 7th overall
- FT Diversity Index top 850 company

Progress in 2023

Spire Healthcare is committed to diversity and inclusion, which includes supporting women to become leaders within the business.

The combined board and executive committee demographic in 2023 is 47% female up from 37% in 2022.

We have five women on our group board, representing 45% female board members in 2023 (2022: 33%), and reflecting our commitment to fair representation across the business. The board considers its members' diversity regularly through data reviews, recruitment decisions and discussions in board meetings. Diversity is also regularly reviewed as part of the workforce demographics discussions at meetings of the remuneration committee and executive committee.

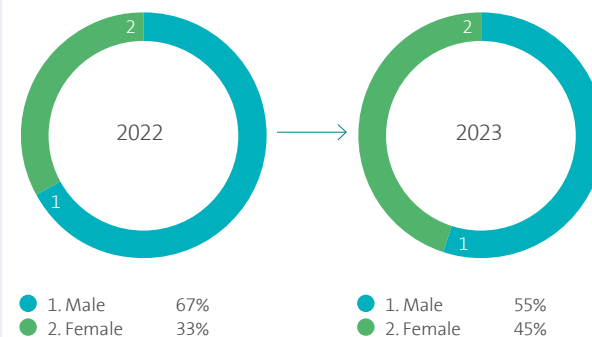
Our executive committee demographic was 38% female in 2023 (2022: 38%).

Spire Healthcare is 7th overall for women in senior leadership positions in the FTSE 250, as recognised by the FTSE 'Women Leaders Review' report for 2023, and first in the health care sector which covers the FTSE 350 and the 50 largest private companies. Our executive committee combined with our senior managers – their direct reports – was 51% female at 31 October 2023, as reported to the review.

We are one of 68 FTSE 350 companies that have already met, or exceeded the target for Women in Leadership, and have done so two years ahead of the target date of 2025.

For more information, see 'Invest in our workforce' strategy section [page 27](#), gender pay gap [page 47](#) and KPIs section [page 61](#)

Gender balance of board





Engage our people and communities

Further reduce gender pay gap among Spire Healthcare colleagues

Timeline End 2025

KPI

Gender pay gap: year-on-year reduction – positive initiatives underway

Initiatives

- Establish workforce committee
- Inclusive approach to training and development
- Monitor and report on gender pay gap
- Support colleague development

Progress in 2023

We are required to report gender pay gap figures for our main employing entity – Spire Healthcare Limited – covering 96.6% of all reportable employees of Spire Healthcare Group. Gender pay reflects the structure of our workforce and is a reflection of the differences in the balance of male and female workers within the wider healthcare sector.

In the interests of transparency, we have supplemented the statutory disclosure requirements with additional data that captures relevant employees across the Spire Healthcare Group. The gender pay gap required by the Gender Pay Gap Regulations represents an average figure. This is distinct from ‘equal pay’, which considers whether men and women are paid the same for carrying out the same work, or work of equal value.

In 2023, the overall median gender pay gap in Spire Healthcare Limited was 9.2% (2022: 6.2%) and the mean was 17.7% (2022: 17.1%).

The median in Spire Healthcare Group was 9.1% (2022: 6.1%) which is below the Office for National Statistics median of 14.3% in November 2023 and the mean in Spire Healthcare Group was 17.2%, (2022: 16.6%).

Our mean gender bonus gap is 82.0%, while the median gender bonus gap is 50.0% for Spire Healthcare Limited. In 2023, 30.5% of males received a bonus across both Spire Healthcare Limited and Spire Healthcare Group, (down from 82.2% in 2022) compared to 28.5% of females in Spire Healthcare Limited and 28.6% of females in Spire Healthcare Group, (down from 83.7% in 2022). Bonus recipients have reduced as all colleagues received a thank you award, classified as a bonus under reporting rules, in 2022 and 2021 gender bonus gap reporting periods.

Gender pay figures are a snapshot from April 2023 and therefore only apply to Spire Healthcare Limited and Spire Healthcare Group, and exclude Vita Health Group, which was not acquired until October 2023. Vita Health Group will report in 2024.

Responding to the gender pay gap

We are taking a number of positive steps to invest in and provide development opportunities for our female colleagues to progress into senior leadership roles and work towards a balanced representation across the organisation to reduce the gender pay gap. The workforce committee has been established to provide oversight of the company’s people strategies.

We are undertaking substantial work with hospital directors and senior leaders to develop a job framework to provide clarity on roles and progression to support careers within Spire Healthcare. We have launched an induction framework for hospital directors, and completed a comprehensive leadership development programme for operations directors, a key role within hospitals which will support newly appointed colleagues.

The resourcing team was brought in-house in 2023 to allow better focus on and control of our approach to candidate pools and recruitment. We continue to undertake talent and succession planning where we look to create opportunities and support the development of female leaders.

We will continue to invest in colleague development and training, focusing particularly on management and leadership capabilities, as well as extending the induction programme for all senior leaders, and we have launched the Driving Clinical Excellence in Practice programme, to enable delivery of high-quality care. It will include a development pathway for allied health professionals and nurses, which will enhance current recruitment and retention.

Gender breakdown

Employees	Male	Female
Overall employees	2,303	8,955

Employee table

Entity	Spire Healthcare Limited		Spire Healthcare Group plc ¹	
Number of employees (includes bank workers) ²	12,787		13,236	
Women’s hourly rate is:				
Mean	17.7% lower		17.2% lower	
Median	9.2% lower		9.1% lower	
Pay quartiles:				
	Men	Women	Men	Women
Top quartile	24.7%	75.3%	24.7%	75.3%
Upper middle quartile	18.7%	81.3%	18.8%	81.2%
Lower middle quartile	20.2%	79.8%	20.3%	79.7%
Lower quartile	16.9%	83.1%	17.2%	82.8%
Women’s bonus pay is:				
Mean	82.0%		81.7%	
Median	50%		50%	
Who received a bonus?				
Men	30.5%		30.5%	
Women	28.5%		28.6%	

1. Including Spire Healthcare Limited, Montefiore House Limited and Claremont.

2. In line with government reporting requirements, the number of employees stated in the table above is the number of colleagues who received full pay in the pay period April 2023.

Sustainability report continued



Engage our people and communities

Maintain an overall colleague engagement score of at least 80%

KPI

Target 80% – 81% proud to work for Spire Healthcare – up 1 percentage point from 2022 based on 86% response rate

Initiatives

- Bespoke guides, support materials and briefing sessions for leaders and teams to support communication of 2022 colleague survey results and action planning
- Role and involvement of colleague survey ‘champions’ developed
- Engagement sessions with survey ‘champions’, throughout the 2023 colleague survey to drive participation, resulting in a response rate increase of nine percentage points
- National and local communications campaign to share progress and positive actions taken since 2022 survey in the lead up to 2023 survey
- Monthly colleague and consultant updates from Chief Executive Officer, Justin Ash, launched in January 2023, and colleague engagement sessions with executive committee and senior leaders in September

Progress in 2023

To help improve engagement, we held an engagement day in April with more than 80 representatives from every part of the business where our colleagues discussed priority areas for driving improvements and shared ideas for embedding changes locally and at a company level.

Ahead of the 2023 survey, each executive committee member hosted engagement sessions in our hospitals, office locations and virtually to give colleagues a business update and an opportunity to ask questions, supported by detailed materials.

We held our annual colleague engagement survey in November 2023. The overall response rate for the full survey was 86% (up nine percentage points from 2022), with our key engagement measure of colleagues being proud to work for Spire Healthcare improving one point to 81%. 84% of colleagues said they get personal satisfaction from the work they do, 86% say they would be happy with the standard of care provided by Spire Healthcare if their friends or family needed treatment (up three percentage points from 2022) and 71% would recommend Spire Healthcare as a place to work. After publication, teams across the business are developing action plans to drive improvements.

Vita Health Group carried out a colleague survey in 2023; with an 80% response rate, 74% of colleagues recommended it as a place to work (2022: 69%).



For more information, see ‘Invest in our workforce’ strategy section on [page 27](#) and KPIs section on [page 61](#)



10



The survey was of Spire Healthcare Limited, LDC and Spire Occupational Health colleagues.



Engage our people and communities

Build strong connections between Spire hospitals and local communities

Initiatives

- Corporate fundraising week
- Long-standing community relationships with local charities
- Working with voluntary sector partners
- Informal community efforts, including supporting local foodbanks
- Outreach to bring NHS services to local communities

Progress in 2023

Contributing to our communities

We firmly believe in the power of giving back to our local communities and making a positive impact on society. In 2023, Spire Healthcare established a group-wide charity committee for the first time. Though various parts of the group contribute to their local communities through different charitable initiatives, the executive committee decided to establish a central committee with the purpose of coordinating, considering and agreeing the group's overall charitable initiatives. The committee is chaired by a member of the executive committee and members have been identified to represent a cross-section of the organisation, with participants from various central functions and each division of our hospitals. The charity committee met three times in 2023 and will seek to meet six times in 2024, with the intention of supporting and facilitating a broader contribution to our communities.

During our annual corporate charity week in June, we fundraised for more than 30 different local and national causes through a huge variety of activities as we aimed to cover more than 40,000km – which is once around the world – between us. For example, Spire Thames Valley held a danceathon and dog show, Montefiore colleagues went wild swimming and for local walks, and central function and hospital colleagues walked between our Reading and London offices. A number of colleagues and consultants cycled between 50 and 200km each and visited Spire Harpenden and Spire Bushey as part of their route. Colleagues sought to live out the objectives of being kind, making a positive difference to worthy causes and having some fun along the way. Colleagues at Spire Nottingham worked with their local school, Tollerton Primary, to raise £750 for its sensory room and to buy a new aquarium for the library. The week raised over £40,000 for a range of local and national good causes.

As well as supporting national charities such as Macmillan Cancer Support during that week, many of our hospitals have strengthened their relationships with local charities and organisations in their communities throughout the year. These charities are chosen by our colleagues, closely reflect the communities they serve, and the support goes beyond fundraising. The relationships with our charity partners are often long-standing and symbiotic, and we offer them valuable resource, locations for meetings and events, workplace experience, and publicity where possible.

For example, we have a close link with LOROS, a Leicestershire charity that provides hospice care. LOROS is funded by voluntary income and delivers high-quality, compassionate care and support for patients, their family and carers. As a provider of chemotherapy, Spire Leicester has access to the excellent palliative care physicians at LOROS who provide expertise and support. This is a service we are pleased to pay for through a service level agreement and we support LOROS in their fundraising efforts, such as marathon walks and the Rocket Round Leicester campaign. We also link with Leicester Riders, who are the country's oldest and most successful professional basketball team – having won 19 titles in the top tier of UK basketball. We provide care and treatment for their players, and many of our colleagues attend their games at the Morningside Arena. We were delighted when Mo Walker, Leicester Riders' 6'10" tall, high-scoring forward, kindly joined us to open the recent upgrade to the hospital's outpatient facilities.

To promote services to 'hard to reach' patient groups, Vita Health Group colleagues work closely with voluntary sector partners to stimulate referrals and bring services to supermarkets, libraries and community centres through a network of partnership liaison officers. In 2023, VHG commissioned a 'mental health bus' which stimulated community awareness of NHS talking therapies in the east Midlands.



Sustainability report continued



Operate responsibly

Target 'Good' / 'Outstanding' CQC scores across all our hospitals (or equivalent)

KPI

Our target is for 100% of our inspected locations to achieve 'Good' or 'Outstanding' ratings or the equivalent from regulators in England, Scotland and Wales – 98% in 2023 (98%: 2022)

Progress in 2023

Quality underpins everything we do. We have robust ward-to-board governance and internal audit procedures, and members of the board and executive committee regularly visit and meet with hospital leaders, colleagues, consultants and medical advisory committees.

We expect the highest possible standards across all Spire Healthcare sites, delivering care and safety to the highest standards every day. Currently 98% of our inspected sites are rated 'Good' or 'Outstanding' or the equivalent by health inspectors in England, Scotland and Wales.

100% of Vita Health Group locations are rated 'Good' or have not yet been inspected by the Care Quality Commission but are registered with no conditions or concerns.



For more information, see 'Building on quality' strategy section on [page 24](#)



12



Operate responsibly

All Spire Healthcare hospitals to achieve a rating of at least 80% across colleague experience, patient experience and consultant experience

KPI

80% of employees stating they are proud to work for Spire Healthcare – 81%

80% of private patients rating their overall experience as 'very good' – 80%

80% of consultants who rate the care given to their patients by Spire as either 'excellent' or 'very good' – 83%

In 2023, seven hospitals met all three of these criteria (2022: 7), 31 hospitals met at least one (2022: 31) and 16 met at least two (2022: 16).

Progress in 2023

We seek to offer our patients rapid access to high-quality, compassionate, personalised healthcare, with expert clinicians, at a price they can afford. We aim to make Spire Healthcare the first choice for consultants, and to invest in the best people, facilities and equipment to achieve this.



For more information, see strategy sections 'Drive hospital performance', 'Build on quality' and 'Invest in our workforce' on [pages 21 to 30](#)



13





Operate responsibly

Maintain robust standards of clinical and corporate governance in line with best practice

Initiatives

- Implementing PSIRF across the organisation

Progress in 2023

We constantly seek to improve our standards of clinical and corporate governance, while quality sits at the heart of Spire Healthcare's culture. Our Quality Improvement (QI) strategy is now fully embedded across the organisation, while our non-executive directors conduct regular hospital visits, meet with hospital leaders, and attend local medical advisory boards and national conferences.

We are also implementing the new NHS England Patient Safety Incident Response Framework (PSIRF), which promotes a new, more proportionate approach to responding to patient safety incidents. It recommends a system-based approach to learning, with supportive oversight of consultants focused on strengthening our response systems and continuous improvement. The PSIRF strategy advocates the use of QI methodology to seek lasting solutions for issues, created by the people involved. This promotes colleague and patient engagement, ensuring we respond to the voice of those involved in incidents.

We continue to actively contribute data to relevant registries including the National Joint Registry (NJR) in 2023. 31 Spire hospitals achieved the Quality Data Provider certificate, based on 2022/23 NJR Data Quality Audit with 19 receiving the 'gold' award.

The Independent Healthcare Providers Network (IHPN) published a refreshed Medical Practitioners Assurance Framework (MPAF) in September 2022; we conducted a review and provided assurance to the board. In 2023, we remain fully compliant with the framework.



For more information, see 'Build on quality' strategy section on [page 24](#) and Clinical governance and safety committee report on [page 101](#)

14



Operate responsibly

Promote an open and learning culture

Initiatives

- Freedom To Speak Up Guardians at all our sites
- Launched a Speak Up training module from the National Guardian's Office, mandatory for all colleagues and consultant partners
- Piloted PSIRF in three hospitals

Progress in 2023

We welcome PSIRF, as the framework not only helps us manage professional standards, but also builds on our open and learning culture.

We work hard to create a culture that is characterised by openness, respect, collaborative working, a focus on clinical safety, and a spirit of continuous improvement. Attracting, retaining and developing great people is a high priority for us, and we can only do this if colleagues feel valued, rewarded, motivated, and supported by clearly defined career paths.

We continue to encourage our colleagues and consultant partners to speak up if they see something that's wrong, and we will always listen to them and support them. We have Freedom to Speak Up Guardians at all our hospital and non-hospital sites, and available for colleagues who work remotely, to whom colleagues can turn.



For more information, see 'Build on quality' strategy section on [page 24](#) and 'Investing in our workforce' [page 27](#)

15



Sustainability report continued



Operate responsibly

Further develop our approach to controls around modern slavery

Initiatives

- Review the level of performance and risk of our key suppliers across a range of areas including the environment, labour and human rights, fair business practices, ethics and sustainable procurement

Progress in 2023

Spire Healthcare Group is committed to acting ethically and with integrity in all our relationships, in line with our value of 'Doing the right thing'. Our approach to tackling the risk of modern slavery continues to evolve under the oversight of our sustainability committee, which reports to our executive committee to ensure that our directors have full oversight on all relevant matters.

Our two main areas of focus are, a) to safeguard patients, colleagues and others who come through our facilities, and b) in our supply chain. In our business operations, we believe practitioners and colleagues are well-placed to identify and deal with modern slavery concerns through the safeguarding training and protections we have in place. The safeguarding system trains those practitioners and other colleagues (clinical and non-clinical) to recognise and report signs of abuse. We believe the rigour of this system mitigates the risk of modern slavery from either going undetected or being dealt with inadequately. This risk is further controlled by the support, training and infrastructure in place for all colleagues to be able to raise concerns through our network of Freedom to Speak Up Guardians, or other available channels. In 2023, we:

- Maintained our modern slavery due diligence process for new suppliers with an annual spend of in excess of £1 million. There were no issues identified through this process
- Updated our procurement policy, which ensures that our hospitals and clinics are equipped with guidance and a risk assessment tool for evaluating modern slavery risks in local contracts



- Completed an initial assessment exercise of third-party management systems which can risk-assess and monitor the level of performance and risk of key suppliers across a range of areas including labour and human rights. It is intended that our sustainability committee will review this during 2024
- Continued supplier and product rationalisation initiatives, focusing our attention on increasing the proportion of spend with long-standing reputable suppliers, with whom satisfactory due diligence has been carried out, where appropriate

In 2024, we plan to continue the activities outlined above, and further review our approach to enhance third-party supplier risk monitoring and performance.

Spire Healthcare's latest Modern Slavery Act statement
investors.spirehealthcare.com/investors/modern-slavery-act-statement

Vita Health Group's Modern Slavery Act statement
vitahealthgroup.co.uk/slavery-and-human-trafficking-statement

The Doctors Clinic Group's Modern Slavery Act statement
spireoccupationalhealth.com/about-us/accreditations-policies



Operate responsibly

Maintain and strengthen information governance and data security

KPI

Establish security performance dashboard to facilitate investment decisions by measuring investment versus protection – 2024

Establish security programme of work to implement the NIST recommendations of 2022/3 – ongoing

Onboard new security operations centre – 2024

Define enterprise-wide data strategy and implement a modern data platform architecture – 2024

Initiatives

- New data strategy, governance and security committee
- Investments to strengthen and enhance our security posture, or overall cyber security strength

Progress in 2023

Spire Healthcare's cyber security sustainability strategy covers three key pillars: people, process and technology. We are investing time, attention and capital to reduce risk and strengthen the group's information governance and data security position.

With ever changing security landscapes, risks and threats, we take this very seriously, and engage with security partners to conduct independent reviews and audits of our systems. We maintain industry-recognised security certifications such as ISO27001:2013, Cyber Essentials, Cyber Essentials Plus and regulatory compliance for contracts such as the NHS Data Security and Protection toolkit. We also use the National Institute of Standards and Technology (NIST) score for continual security assessment for benchmarking purposes against our peers in the healthcare industry and more broadly.

In 2023, we established a new data strategy, governance and security committee, which reports to the executive committee and has a dotted line to the audit and risk committee of the board. The committee draws its members from across the organisation, including from the clinical, IT, commercial, operational and legal functions. This ensures wide visibility and consideration of data and security matters from around the business, enabling more effective management of information and data risk.

We continued to make considerable investments in 2023 to strengthen and enhance our security position by adopting enterprise level platforms (software designed for the complex needs of large organisations) and working with industry-leading security partners. At the same time, we received regular intelligence on potential threats from a number of sources and agencies.

The strategy covers Spire Healthcare Limited only at this stage; we are working to bring the rest of the group under the same security governance.

