

# Sustainability

## 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.



### Our sustainability goals, timelines and KPIs



#### Respect the environment

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#### Engage our people and communities

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#### Operate responsibly

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\* The sustainability strategy was written for the hospitals business. We anticipate working to bring the rest of the group under the same plan in 2025

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Group

Respect the environment

# Attain net zero carbon status by the end of 2030 – includes carbon emissions, energy use and capital investment

**Timeline**  
End 2030

**KPI**

Target: tCO<sub>2</sub>e emissions in line with our decarbonisation plan – 6.2% behind target (2023: 3% ahead of target)

**Initiatives**

- Installation of PV solar panels on all hospitals
- Optimisation of Building Management Systems (BMS)

## Progress in 2024

In 2024, we have invested £10.2 million on installing PV solar panels and building management systems throughout our hospitals estate, reduced our targeted emissions from our baseline year of 2019 by 24%, but have paused our purchase of renewable energy guarantees of origin (REGOs) owing to the significant increase in cost. However, we remain committed to our goal of attaining net zero status by 2030. We welcome the recent announcement by the National Grid to double the transmission capacity of the UK’s electricity grid with backing from the UK government. Government policy in supporting the decarbonisation of the National Grid, and degassification of heating systems, will be critical to enable us to achieve our net zero target.

### Our 10-year carbon reduction target

Using 2019 as a base year, we have set ourselves emission reduction targets out to 2030. Our base year emissions were 34,910 tCO<sub>2</sub>e. The emissions covered by our target reporting include all Scope 1 and Scope 2 emissions, as well as Scope 3 emissions from air and rail travel. These are the emissions we control (the Spire Healthcare Carbon Footprint).

In 2024, we extended our target reporting boundary to include all our subsidiaries. We have now included emissions in 2024 for Vita Health Group and The Doctors Clinic Group. In accordance with the GHG Protocol we have determined that the structural changes to our organisation have breached our qualitative criterion ‘significance threshold’ and triggered the need to reset the baseline. Our 2019 base year and all subsequent years’ targets have increased with the inclusion of these additional subsidiaries.

In 2024, our emissions were 26,522 tCO<sub>2</sub>e which is a 24% reduction since our 2019 base year. As our interim annual target for 2024 was 24,963 tCO<sub>2</sub>e, our performance was 6.2% adverse to our target.

When targets were set, we had anticipated purchasing REGOs in 2025. With none being procured, due to factors out with our control, electricity targets were difficult to achieve. The market value of REGOs

have been prohibitively high with significant increases in market prices resulting from the exit of the UK from the Europe-wide REGO scheme. It is our long-term objective to use this market-mechanism, but have decided to wait and monitor the markets and in the meantime reinvest in our own renewable projects.

Additionally, during the year we believed we were on track to achieving target until final billing with our energy supplier revealed data inaccuracies. Additionally, Scope 1 transport has increased slightly due to increased business activity.

Despite missing the year-end target, it should be noted that we still reduced emissions from 2023 to 2024 by 1,197 tCO<sub>2</sub>e and from the base year 2019, we continue to make good progress, reducing emissions by 8,388 tCO<sub>2</sub>e.

We invested significant capital to decarbonise in 2024 and these projects should more fully develop and generate savings into 2025. We are installing solar PV arrays at all our hospital sites. The majority were completed and energised in 2024. Solar power generated on site will displace purchased electricity and therefore related carbon emissions.

Additionally, we are well progressed with upgrading all hospital building management systems (BMS). This will help us improve operational control of our hospitals’ heating, ventilation and cooling systems (HVAC). Once again, most hospital sites have been upgraded with the remainder to be completed in early 2025. A rolling programme of LED lighting has continued, which has helped curb electricity emissions.

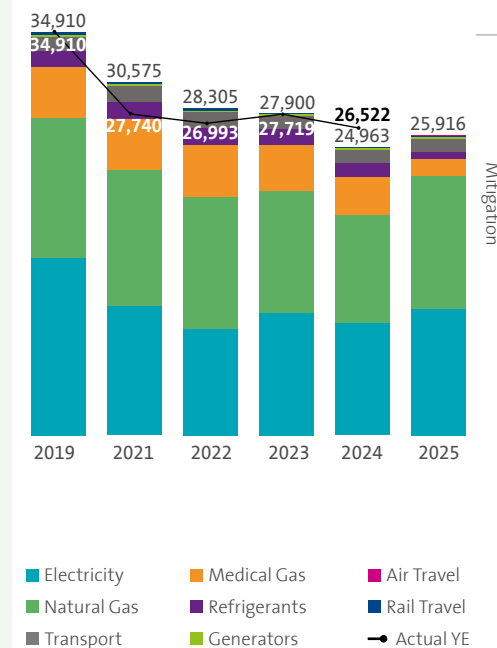
Piped nitrous oxide has been physically removed from service at all hospitals and our improved reporting accuracy for fluorinated gases has resulted in lower emissions, which has helped mitigate performance elsewhere. The hospitals continue to invest time in energy efficiency projects, using hospital level targets to drive our carbon champions to save energy through communications such as our newsletter, by promoting behavioural change and through small capital projects, complimenting the large capital projects that we have underway.

## Our carbon reduction roadmap

The graph below shows annual targets for emissions reductions as well as actual performance. The targets and baseline now include Vita Health Group and The Doctors Clinic Group. Considering our 2024 performance and the evolving emissions reporting sphere, we have created a new interim target for 2025, to allow us time to review our options for future reporting years. Among consideration is adopting targets that are in line with the Science Base Targets Initiative (SBTi) methodology. We will also review any other best practice for emissions target setting.

Our review has been triggered by REGOs now costing more than initially expected and the cost of degasification not being at the levels anticipated when targets were set in 2020.

Spire Healthcare net zero carbon emissions (tCO<sub>2</sub>e) reduction plan



1

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

Sustainability report continued

Additionally, our review will increase the scope of our emissions reporting to include our whole GHG inventory and adopt best-practice target setting.

The 2025 target of 25,916 tCO<sub>2</sub>e will ensure we continue to strive for emission reductions from 2024's year-end position of 26,522 tCO<sub>2</sub>e. The 2025 target is for all Scope 1 and Scope 2 emissions as well as Scope 3 emissions from air and rail.

Carbon credits

Our surplus emissions, over target, amount to 1,559 tCO<sub>2</sub>e. In order to demonstrate our commitment to the avoidance and removal of greenhouse gas (GHG) emissions we have purchased credits for this surplus. The project in which we decided to invest is a REDD (Reducing Emissions from Deforestation and Forest Degradation) project in Brazil. This project is certified by Verra through its Verified Carbon Standard (VCS) Program which is the most widely used greenhouse gas (GHG) crediting programme in the world. We are aware that carbon credit programmes have their limitations and will undertake appropriate due diligence prior to engaging in any major use of carbon credits to offset future emissions.

CDP reporting

We have retained our Climate Disclosure Project (CDP) management level band scoring for the 2024 response. There was a minor drop in the actual scoring to a 'B-' from 2023's 'B'. The questionnaire had a large overhaul in 2024 with many additional questions and sections. We are looking to address gaps in our response to improve scoring in 2025. Several categories within the response improved in scoring such as our Risk Disclosure, Governance and Scope 3 Emissions reporting.

6%

Behind 2024 target emissions – 26,522 tCO<sub>2</sub>e achieved, target 24,963 tCO<sub>2</sub>e (2023: 3% ahead)

Full GHG inventory and streamlined energy and carbon reporting

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 GHG emissions for the Spire Healthcare Group in 2024 were 352,202 tCO<sub>2</sub>e. For the first time we are reporting our full GHG inventory with all scopes included (see table opposite). The only notable exception is Scope 3 Category 7: Employee Commuting. From 2025 we will begin to include commuter surveys in our annual questionnaires to allow us to determine emissions from this category.

Notes on the table

Emissions stated are for all Scope 1 and Scope 2 emissions as well as all Scope 3 categories where information is currently available.

a. Methodology and emissions factors

The Streamlined Energy and Carbon Reporting Regulation (SECR) report relates to Spire Healthcare Group PLC (and all subsidiaries) and covers the emissions from its operations from January 2024 to December 2024.

The reported carbon emissions have been calculated following the guidance in the UK government's Environmental Reporting Guidelines, 2019, and the methodology outlined in The GHG Protocol Corporate Accounting and Reporting Standard (revised edition). The carbon emission factors have been obtained from the UK government's GHG Conversion Factors for Company Reporting 2024. An 'operational control' methodology has been adopted to outline the scope of carbon emissions reporting for Spire Healthcare; operational control refers to the ability of an organisation to direct the activities of a facility or operation. In the context of GHG reporting, a company is considered to have operational control over a facility or activity if it has the authority to introduce and implement operating policies at that facility or in that activity, regardless of ownership.

Activity – Category	2023 (tCO <sub>2</sub> e)	2024 (tCO <sub>2</sub> e)	Percentage Change (%)	Actual Change (tCO <sub>2</sub> e)
<b>Scope 1: direct emissions from the operation of owned and controlled facilities and equipment</b>				
Scope 1 Total (tCO <sub>2</sub> e)	15,491	14,528	-6%	-963
<b>Scope 2: indirect emissions – from the production of purchased energy</b>				
Scope 2 Location based total (tCO <sub>2</sub> e)	12,204	11,903	-2%	-302
<b>Scope 3: indirect emissions from the value chain</b>				
1. Purchased goods and services	233,441	264,277	13%	30,836
2. Capital goods	46,013	53,608	17%	7,596
3. Fuel and energy related activities	6,276	6,286	0%	10
4. Upstream transportation and distributions	280	467	67%	187
5. Waste generated in operations	418	226	-46%	-193
6. Business travel	335	402	20%	67
7. Downstream transportation and distribution	407	506	24%	99
Scope: 3 Location Based Total (tCO <sub>2</sub> e)	287,170	325,772	13%	38,602
<b>Total Gross Emissions Location Based (tCO<sub>2</sub>e)</b>	<b>314,865</b>	<b>352,202</b>	<b>12%</b>	<b>37,338</b>
Revenue (£m)	1,359	1,511	11%	152
Intensity Ratio tCO <sub>2</sub> e per (£m) Location Based	232	233	0.6%	1



Sustainability report continued

This means that the organisation is responsible for the GHG emissions from the 'operations it controls'.

This report includes the material carbon emissions, in line with the emissions categories, as required to be reported under the SECR regulations as well as voluntary emissions from all other sources available.

**b. Scope 1: direct emissions from the operation of owned and controlled facilities and equipment**

Scope 1 emissions are made up by emissions from natural gas, transport, medical gases, gas oil (backup generation) and refrigerants.

**c. Scope 2: indirect emissions from the production of purchased energy**

Scope 2 emissions used a location-based methodology in 2024. These emissions are primarily from purchased electricity across our estate. A minor percentage was for the use of battery powered electric vehicles.

**d. Scope 3: indirect emissions from the value chain**

Category 1 and 2 emissions have been calculated using spend-based data with Department for Environment, Food and Rural Affairs (DEFRA) conversion factors for the whole group. Additionally, some primary activity data for water supply has also been included. Category 3 emissions are for well-to-tank for all fuels used, well-to-tank for electricity generation, well-to-tank for transmission and distribution (T&D), and electricity T&D losses.

Category 4 emissions are for the purchase of courier services for incoming goods. Category 5 is for waste generated in operations, coming primarily from waste partners for recycling, combustion and landfill. Some waste data was calculated on a spend-based method for disposals. Category 6 emissions are from air travel, rail travel and hotel stays. Category 9 emissions are for the purchase of courier services for outgoing goods.

From the full inventory it can be seen that Scope 3 emissions dominate. These contribute more than 92.5% of all emissions, with Scope 1 and Scope 2 contributing 4.1% and 3.4% respectively. Scope 1 emissions decreased 6% in comparison to 2023, and Scope 2 emissions decreased by 2%. These are the emissions that we have been proactively targeting for reduction. Emissions from Scope 3 waste performed very well, having decreased by 46%. The rest of our Scope 3 emissions increased, with these mostly being tied directly to spend-based activity data.

As required by SECR legislation we have stated our emissions, 2023's emissions for comparison, an intensity ratio, energy efficiency actions carried out, our methodology and our energy usage. These can be found on page 39-40. Despite our overall emissions increasing our intensity metric has decreased by 0.4% to 231 tCO<sub>2</sub>e per £m revenue.

In 2024 we carried out a comprehensive review of our supply chain in our ongoing commitment to environmental sustainability and reducing carbon emissions. As part of this effort, we were seeking to understand better the environmental impact of our suppliers' operations, particularly GHG emissions. The response received will aid us in identifying opportunities for collaboration in reducing emissions across the supply chain.

Our aim for the future is to begin to develop targets for our Scope 3 emissions.



Sustainability report continued



Hospitals

Respect the environment

## Manage our waste more efficiently while minimising detrimental effects to our planet

KPI

Target: overall recycling 30% by end 2024 – 48% in 2024 (2023: 35%)

Target: hospital sites only dry mixed recycling 30% by end 2024 – 31.4% in 2024 (2023: 23.5%)

Target: offensive waste 40% by end 2024 – 42.9% in 2024 (2023: 36.5%)

Initiatives

- 23 sites averaged over 30% for DMR in 2024 (2023: 13)
- Recycling at 49 clinical and non-clinical sites, up from 47 in 2023 – hospitals, central functions offices, distribution and other non-clinical sites
- Fully rolled out recycling of reusable sharps containers
- Increased recycling rates through further segregation of waste and hazardous materials eg tray wraps and curtains
- Worked to increase segregation of offensive waste and reduce use of paper towel and gloves
- Sustained reduction in infectious waste to 0.4% (2023: 3%) of total clinical waste which lowered carbon emissions and cost, and helped remove offensive waste from incineration
- Sustained working with current waste contractors to mitigate waste going to landfill sites (0.7% of total waste went to landfill)
- Trained over 10,000 colleagues (2023: 1,300) in waste segregation, with mandatory training for all colleagues

### Progress in 2024

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.

In the hospitals, we generate a considerable amount of general waste. This is a combination of domestic waste, most of which can be used to generate renewable energy, and dry mixed recycling (DMR), which can be reused or repurposed. The hospitals business 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.

It is important for our teams to understand the various types of waste and we have been rolling out mandatory waste segregation training since 2023. By November 2024, over 10,000 colleagues (2023: 1,300) had been trained. We incinerated less proportionately of total waste (from 29% in 2023 to 25% in 2024), and absolute tonnage has decreased by 11%. However, as incineration prices per tonne have increased, costs have increased in this area.

In 2024, Spire Healthcare’s waste management initiatives saved over 2,742 tonnes of CO<sub>2</sub> (2023: 358 tonnes) This is equivalent to:

- 9,475 trees planted each year or
- 1,028 cars off the road or
- 1,683 houses powered each year

We are now recycling at 49 clinical and non-clinical sites, up from 47 in 2023.

DMR rates improved in 2024 to 31.4% from 23.5% because mandated training is raising awareness of the importance of segregating waste, combined with investment in new waste segregation bins.

Most sites are now segregating disposable curtains and tray wraps. Following a feasibility study for a ‘gloves off’ campaign with the aim of reducing glove numbers in clinical waste in hospitals, we implemented the initiative successfully in 2024. We also tested the removal or reduction in use of disposable paper tissue roll in many of our outpatient areas and concluded we could implement reduction initiatives safely; we did so from October 2024.

We have ‘offensive waste’ segregation at all our hospital sites. Disposal of offensive waste costs over 60% less per tonne 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 and clinical waste, we reduced our carbon emissions. In 2024, we continued to push the segregation of clinical and infectious waste into offensive waste by focusing on waste segregation in our theatres.

To help reduce our carbon footprint, the sharps bio system roll out, designed by our waste partner Stericycle, was completed across the estate in 2024. 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.

# 48%

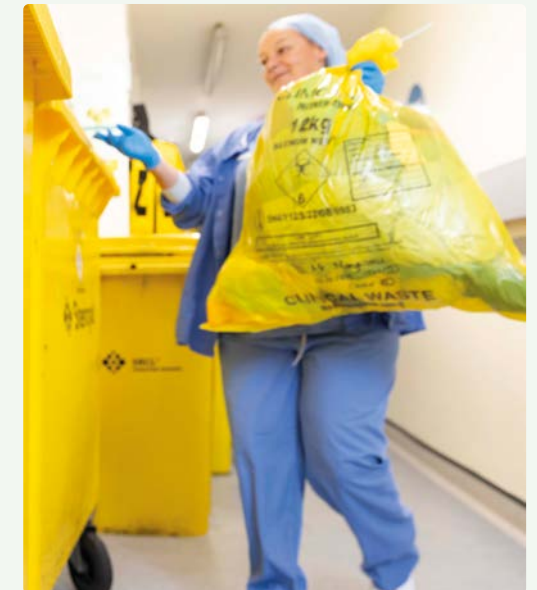
overall waste recycled in 2024, up from 35% in 2023

This includes recycled waste returned to our National Distribution Centre.

# 31.4%

dry mixed waste recycled, up from 23.5% in 2023

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



Sustainability report continued



Hospitals

Respect the environment

## Undertake a comprehensive review of climate risk across our operations

### Timeline

End 2026 – completed in 2023

## Progress in 2024

We completed a comprehensive review of climate risk across our operations in 2023, undertaking our scenario analysis from the impacts of climate change on our business. Our TCFD report on pages 77 to 82 provides the detail and outcomes of the analysis. We will undertake this analysis again by 2026, to ensure that we continue to revise our understanding of the possible impacts as the modelling of future global warming trends improves with a mixture of further actual data and more powerful models.

 For more information, see our TCFD section [page 77](#)



3



Hospitals

Respect the environment

## Identify opportunities to reduce use of single-use plastics

### Initiatives


- Reusable sharps containers saved over 20,000 containers from incineration

4

## Progress in 2024

To help reduce our carbon footprint, the sharps bio system, designed by Stericycle, our waste partner, was rolled out across the hospital estate in 2024.

In 2024, this initiative diverted an estimated 20,455 containers from incineration, 39 tonnes of avoided plastic in manufacturing and 241 tCO<sub>2</sub>e of emissions.

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



Sustainability report continued



Hospitals

Respect the environment

## Identify and act on water-saving opportunities

### KPI

Target: consumption m<sup>3</sup> to be determined

### Initiatives

- Automatic meter reading
- Reviews of housekeeping and catering

## Progress in 2024

### Water conservation

In 2024, our key focus was the deployment of PV solar panels and building management systems as described on page 39. As these programmes are now materially complete, more action will now be taken in relation to water saving initiatives.

Initial focus will be on the roll out of automated meter reading for all our hospital sites, delivering accurate measurement of water consumption, and to understand the impact of water saving activities. We are in discussion with our advisors and suppliers over this initiative with a view to implementation in 2025.

In the meantime we have continued to make tactical savings, eg identifying and removing low-use outlets. From reviews of our housekeeping and catering processes, we believe further savings in water consumption will be forthcoming in 2025.





Group

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 a large nurse apprenticeship programme
- Driving Clinical Excellence in Practice programme
- People management training

## Progress in 2024

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

Supporting the development of our colleagues is crucial to maintain our high standards of quality and care. Our five-year nursing and allied health professional (AHP) strategy focuses on delivering excellent, safe practice and care and has three strands: developing our workforce, driving clinical excellence through practice and enhancing professional pride.

In 2024, we launched our new Driving Clinical Excellence in Practice programme, which supports the continuing professional development of registered nurses and allied health professionals; 350 colleagues have started it. The programme considers clinical skills and competencies, and meaningful subject matters within healthcare.


Professional development is an important part of our offer to attract and retain the best people to work in our hospitals and clinics. We seek to refresh colleagues' competencies and skills regularly. Clinical competencies will be part of our new automated online learning management system for mandatory training, launching in 2025. The new platform will not only reduce risk by ensuring that compliance and mandatory training is appropriately delivered, but also allow colleagues to drive their own development when it is launched in 2025.

In 2024, over 110 apprentices graduated from our apprenticeship programmes, including many who achieved functional skills in maths and English to be able to participate in higher level programmes. We give them the right environment in which to thrive, study and learn. We continue to sustain a healthy pipeline of new apprentices enrolling in our programmes, and closely monitor performance against retention and career progression data.

Our largest apprenticeship programme is the Registered Nurse Degree, and our apprentices continued their studies in 2024 with the University of Sunderland and in placements in a range of nursing settings. Nurse graduates deliver critically needed nursing skills directly into the UK's healthcare sector. We currently have over 380 apprentices across the group in a wide range of clinical areas such as laboratory medicine, physiotherapy, pharmacy, theatres, as well as non-clinical disciplines such as engineering, governance and hospitality, and in Vita Health Group, representing around 3% of our permanent workforce.

We offer a range of opportunities to help colleagues learn and grow at work. In 2024, we continued to focus on developing manager capability, including the introduction of a new managers programme where more than 100 managers with less than six months' experience learned the fundamental skills for great people management.

In Vita Health Group, a mentoring scheme in 2024 supported 56% of participants to advance in their career. A new induction process for joining colleagues was introduced in 2024 to manage the training at a more manageable pace.

 For more information, see our TCFD section on page 77 and Investing in our workforce on page 29



# 350

colleagues have started Driving Clinical Excellence in Practice training programme (new for 2024)

Sustainability report continued



Group

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

### KPI

Target: 18% ethnic minority representation in executive committee and their direct reports

### Initiatives

- Agreed targets to improve diversity and belonging, ahead of new EDI strategy implementation in 2024
- Consider ethnic diversity balance when constructing Spire Healthcare’s leadership programmes
- Broad range of networks including for sexuality, racial equality, menopause and women
- Reviewed external benchmarks – Parker Review
- Working towards better data to improve reporting and planned action

## Progress in 2024

We have reviewed this goal in line with the requirements of the Parker Review: ‘Improving the Ethnic Diversity of Business’, published in 2023, to assess how best to support diversity in the business. At the end of 2024, we agreed a target of 18% ethnic minority representation within executive committee and their direct reports.

Diversity remains vital to our success, and our equity, diversity and inclusion (EDI) strategy was reviewed in 2024 with a view to defining organisation-level targets to help us improve diversity and belonging within the business.

We were pleased to be listed in the Financial Times Diversity Leaders index for another year; an index of companies considered to be Europe’s diversity leaders, based on a survey of 100,000 employees across Europe. We aspire to create an environment where everyone is respected and where difference is celebrated.

The group’s executive committee demographic was 22% ethnically diverse in 2024 (2023: 25%) and the board is 10% ethnically diverse, up from 8% in 2023. For executive committee and their direct reports, the proportion was 9.2% ethnically diverse (2023: 7.8%).

### Colleague networks

We have networks supported by a member of the executive committee to give focus and impetus. All networks contribute to policy and inclusion.

Our race equality network is a 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 and communications updating colleagues on actions taken and celebrating successes. Regular catering events encourage embracing diverse cultures and backgrounds.

Our menopause network completed a second survey in 2024, which showed an improvement in awareness of menopause and symptoms among colleagues and knowledge of the menopause policy. Comments showed a need for training to support line managers’ understanding of symptoms and each person’s

experience; we have released an awareness booklet and now offer additional health benefits for permanent employees. We have also trialled an alternative gender-free uniform, which can be worn by anyone.

The LGBTQ+ network is colleague-led and offers support, training and celebration, and contributes to group policy formation. In early 2025, the network was awarded ‘highly commended’ by the Metro Pride Awards as in the LGBTQ+ best colleague network category, for strengthening organisation culture.

VHG has networks on women, LGBTQIA+ and race equality, presenting safe spaces for those communities. Each network is involved in setting policies for the business.

### 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 across the hospitals business, 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 in Spire Healthcare Limited who disclose their ethnicity, 20.4% report having a non-white background, up from 18.9% in 2023.

VHG has positive action schemes in place to reduce barriers to employment faced by people with disabilities, women, veterans and those from ethnic minority backgrounds. The schemes guarantee interviews for those applicants who meet the role criteria. Colleagues have also been offered a wide variety of training including anti-racism, disability awareness and LGBTQIA+ awareness.



# 20.4%

of those hospitals business colleagues who disclose their ethnicity, report having a non-white background (2023: 18.9%)

### Headcount by ethnicity Spire Healthcare Limited

Asian	1,582
Black	610
Chinese	78
Mixed	246
White	10,410
Other	158
Not stated	2,655





Group

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

Target: proportion of females 42% at board and executive committee combined – 47% in 2024

Target: board diversity policy, minimum of 33% female directors on the board: 33% by 2023 AGM and 40% by 2025 – 50% in 2024

### Initiatives

- FTSE Women Leaders Review – first in healthcare and 4th in the FTSE 250
- FT Diversity Leaders Index top 850 companies in 2024 – ranked 165 up from 433 in 2023
- Women in Work top 100 company 2024

## Progress in 2024

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


We have five women on the board, equal to 50% of the membership, in 2024, up from 45% in 2023, 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 33% female in 2024 (2023: 38%).

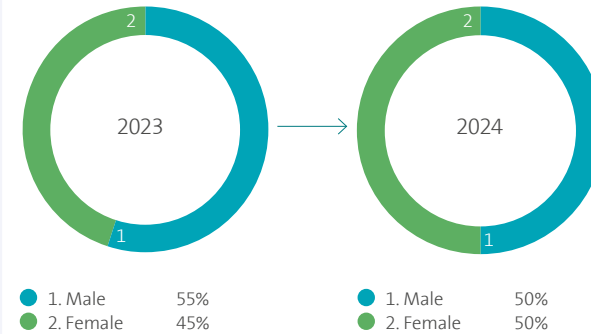
The combined board and executive committee demographic in 2024 is 47% female, level with 2023.

Spire Healthcare is 4th in the FTSE 250, and first in healthcare, for women in senior leadership positions, as recognised by the FTSE Women Leaders Review report for 2024/25 which covers the largest UK companies. Our executive committee combined with our senior managers – their direct reports – was 55% female at 31 October 2024 (2023: 58%), as reported to the review.

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

 For more information, see [Investing in our workforce on page 29](#), [gender pay gap on page 48](#) and [KPIs section on page 62](#)

### Gender balance of board



Sustainability report continued



Hospitals

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

- Inclusive approach to training and development
- Monitor and report on gender pay gap
- Build talent pipeline and support colleague development

## Progress in 2024

Our main employing entity is Spire Healthcare Limited – covering 83.8% of all reportable employees of Spire Healthcare Group. In the interests of transparency, we have provided additional data that captures relevant employees across the Spire Healthcare Group.

Gender pay reflects the structure of our workforce and the differences in the balance of male and female workers within the wider healthcare sector. Gender pay is distinct from ‘equal pay’, which considers whether men and women are paid the same for carrying out the same or equivalent roles.

In 2024, the overall median gender pay gap in Spire Healthcare Limited was 11.6% (2023: 9.2%) and the mean reduced to 16.2% compared to 17.7% in 2023.

The median gender pay gap in Spire Healthcare Group was 12.3% for 2024 (2023: 9.1%) which is below the Office for National Statistics median of 13.1% published in October 2024. The mean gender pay gap for Spire Healthcare Group reduced to 16.1% from 17.2% in 2023.

Our mean and median gender bonus gap reduced in 2024 compared to 2023 for Spire Healthcare Limited and Spire Healthcare Group. For Spire Healthcare Limited the mean gender bonus gap for 2024 was 74.7% compared to 82.0% in 2023 and the median gender bonus gap was 25% from 50% in 2023. For Spire Healthcare Group the mean gender bonus gap for 2024 was 76.2% compared to 81.7% in 2023 and the median gender bonus gap was 25% from 50% in 2023.

## Responding to the gender pay gap

We understand and value the benefits that diversity can bring across all levels of the organisation. Having a visibly diverse leadership fosters a culture of inclusion that both attracts a broader talent pool and also allows our future talent to recognise that progression is possible to senior leadership roles.

We have made a focused effort to better understand our gender data across all levels within our organisation and where we have either weak or strong levels of gender balance in the talent pipeline. In addition we have been reviewing, updating and creating new policies (for example menopause policy) that can support all women in our workforce. This has been a conscious effort to both attract and retain our female talent.

The introduction of the job framework for hospital colleagues has provided clarity on progression pathways, enabling better flow and retention of female talent. These efforts are underpinned by a targeted talent pipeline strategy, designed to identify, develop and support female colleagues at all levels.

In addition, 2024 was the second successful year of insourcing our recruitment which has significantly reduced vacancies and time to hire, allowing even more focus on the right candidates for roles and will help focus on gender and diversity representation.

We continue to undertake talent and succession planning where we look to create opportunities and support the development of female leaders.

We continue to invest in colleague development and training, focusing particularly on management and leadership capabilities. In 2024 representation was gender balanced across our executive coaching programme.

## Gender breakdown

Employees – Spire Healthcare Limited	Male	Female
Overall employees	2,436	9,319

## Employee table

Entity	Spire Healthcare Limited	Spire Healthcare Group plc <sup>1</sup>	
Number of employees (includes bank workers) <sup>2</sup>	13,115	15,703	
<b>Women’s hourly rate is:</b>			
Mean	16.2% lower	16.1% lower	
Median	11.6% lower	12.3% lower	
<b>Pay quartiles:</b>		<b>Men</b>	<b>Women</b>
Top quartile	25.8%	74.2%	73.5%
Upper middle quartile	20.4%	79.6%	79.8%
Lower middle quartile	20.9%	79.1%	79.5%
Lower quartile	16.1%	83.9%	83.7%
<b>Women’s bonus pay is:</b>			
Mean	74.7%	76.2%	
Median	25.0%	25.0%	
<b>Who received a bonus?</b>			
Men	32.0%	30.8%	
Women	29.8%	28.2%	

1. Including Spire Healthcare Limited, Montefiore House Limited, Claremont, Vita Health Group, Spire Occupational Health and London Doctors Clinic  
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 2024.



Sustainability report continued



Hospitals

Engage our people and communities

## Maintain an overall colleague engagement score of at least 80%

### KPI

Target: 80% proud to work for Spire Healthcare – 76% in 2024 (2023: 81%)

### Initiatives

- Actively grew number of colleague survey engagement champions so each area of the hospitals business is represented.
- Introduced regular online meetings with champions, sharing key activities such as awareness events and pilot of Viva Engage, examples of action planning in practice and local engagement initiatives to develop best practice
- Worked closely with the people operations team to develop ways of working to provide local support for management team action planning, and in delivering the 2024 colleague survey
- Supported 2024 survey preparations in our hospitals with bespoke team presentations and Q&A documents for management teams' use
- Engaged with hospitals with the lowest colleague survey response rates in 2023 to provide extra support as required for the 2024 survey

## Progress in 2024

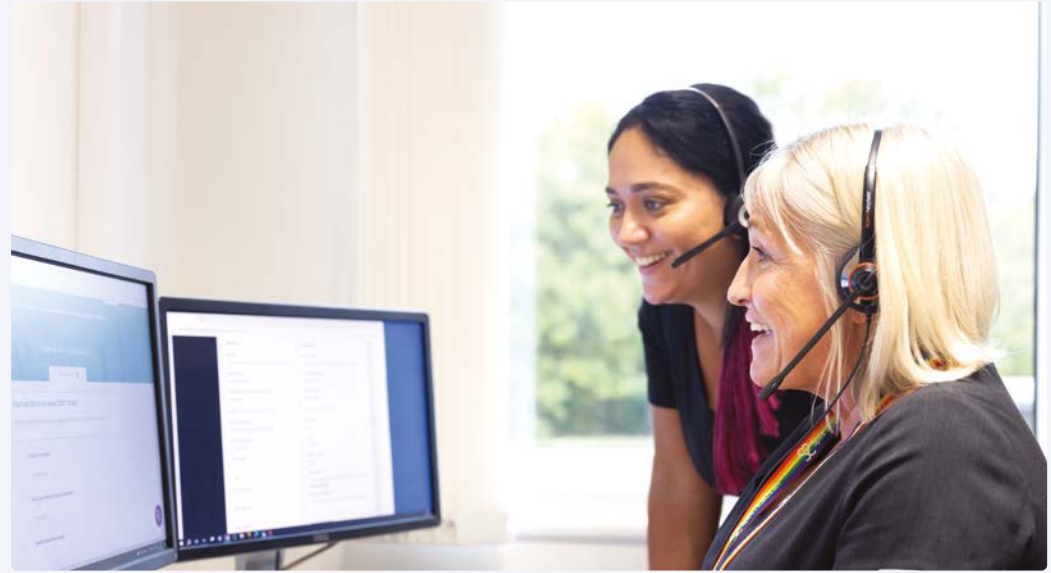
We want our colleagues to have a great work experience, and if they feel engaged, they can perform at their best. Regular communication is an important part of our engagement activities and we use a variety of communication channels to provide regular updates on all aspects of our hospitals business.

We aim to make it easy for frontline hospital colleagues without regular access to email to get involved in our communication and engagement activities. Our colleague communications app (provided by Ryalto) is available for colleagues to access on their own personal devices to stay connected easily. The app is an excellent platform to recognise teams and individuals. In 2024 we published key information in a variety of formats including photos and animations, as well as videos from our chief executive officer and the executive committee.

In 2024, we introduced Microsoft Viva Engage in the hospitals business, a key communication and collaboration tool. Following a pilot in the summer with senior leaders, we successfully launched Viva Engage into Spire Leeds and Spire Yale hospitals, set up a company newsfeed and launched to two central functions teams. Integrated as part of the Microsoft 365 suite of applications and available on personal devices and computers, Viva Engage will build upon the success of Ryalto and make it easier for colleagues to interact across different communities that represent local teams, role type and personal interests.

We encourage regular feedback from colleagues, with annual surveys to gain in-depth feedback across the group. We held our group-wide colleague surveys in November, with colleagues in hospitals, central functions, LDC and Spire Occupational Health completing the same survey\*. For the first time, VHG aligned the timing of its survey and introduced new questions to provide important year-on-year comparisons, and group-wide indicators.

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




Results for the hospitals business showed an overall response rate of 83% (86% in 2023), with 76% of colleagues saying they are proud to work for the business (81% in 2023), and 83% would be happy with the standard of care if their friends or family needed treatment (86% in 2023).

Results for VHG showed an engagement score of 78% (2023: 81%) with a response rate of 82% (2023: 80%).

In March, we held a colleague survey champions day for the hospitals business with a focus on understanding the drivers behind the key themes from the 2023 colleague survey, ideas for action plans and how to drive meaningful change. The year's key themes included recognition and trust in leadership, celebrating differences and recommending Spire as a place to work. Since its last survey, VHG has followed up to understand their scores and seek improvements.

We focused on four main themes from a safety survey of hospitals business colleagues in 2024, related to accessing the patient safety policy, speaking up, feedback and behaviour. This survey was linked to the chief executive's 'Listen Up' theme for the year and sought to gain more insight into this important area, supporting an open culture where people feel comfortable to speak up. The findings show that there is opportunity for focus and for us to question ourselves 'how do we get better?'. We are also analysing possible reasons why some hospitals appear to be making greater progress than others and will share learning in committee reports.

Line managers conduct regular one:one meetings and full and half-year reviews. Our executive committee and non-executive directors dedicate quality time to people issues across the group, and continued to engage with colleagues over 2024 through the workforce committee and colleague listening sessions at sites across the country.

 For more information, see Investing in our workforce on page 29 and KPIs section on page 62

Sustainability report continued



Group

Engage our people and communities

## Build strong connections between Spire hospitals and local communities

### Initiatives

- Corporate charity drive
- Strong community relationships with local charities
- Financial support to sites or individuals who are fundraising
- Working with voluntary sector partners
- Informal community efforts, including supporting local foodbanks
- Outreach to bring NHS services to local communities

## Progress in 2024

### Contributing to our communities

We 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 to coordinate, consider and agree the group's overall charitable initiatives. The committee is chaired by a member of the executive committee with participants from across the organisation. In 2024, the committee held a strategy day and agreed to start pledging grants to sites and individuals who are fundraising. The committee agrees the level of grant or donation – for the latter, individuals must raise at least the amount donated by Spire.

During our annual corporate charity drive in June, hospitals raised £7,000 for Maggie's, the cancer charity, and the business donated an additional £10,000. In addition, hospitals took part in local fundraising for more than 25 different worthy causes – activities included a charity bike ride, a fun run and baking. Colleagues sought to live out the objectives of being kind, making a positive difference to worthy causes and having some fun along the way.

As well as supporting national charities such as Maggie's, many hospitals strengthened their relationships with local charities and organisations in their communities throughout the year. These charities, which are chosen by our colleagues, closely reflect the communities they serve, and the support goes beyond fundraising. The relationships are often long-standing and we offer them valuable resource, locations for meetings and events, workplace experience, and publicity where possible.

Christmas was a particularly active time in 2024. Spire Bushey Hospital was delighted to provide its annual Christmas lunch to the Over 60's club in a local church, an event which has been ongoing for over 30 years; the hospital catering team produced a fantastic meal with all the trimmings. Spire Liverpool's colleagues and consultants donated gifts for the Cash for Kids appeal, doubling their 2023 collection. The charity works with disadvantaged children from birth to 18. Spire Cardiff colleagues donated 90 gift bags to a south Wales charity for underprivileged children, the Mr X Appeal, and raised over £1,000 for the Welsh Air Ambulance.

Earlier in the year, Spire Parkway raised over £10,000 for Cancer Research UK's Race for Life. Over 50 colleagues took part in the muddy obstacle course in Birmingham, some of whom have, themselves, been affected by cancer.

To promote services to 'hard-to-reach' patient groups, Vita Health Group's partnership liaison officers work closely with voluntary sector partners to stimulate referrals and bring services to locations such as supermarkets, libraries and community centres. In 2024, they engaged with local community partners and voluntary organisations to better understand patient groups to improve access and outcomes. In 2024, a project began to prepare for the patient carer race equality framework, which comes into force in March 2025 for all providers of mental health services for NHS patients.

At Vita Health Group, each colleague can take one volunteer day per year; this was little used in 2023 but in 2024 over 80 days were taken, giving time to local communities.



Sustainability report continued



Hospitals

Operate responsibly

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

KPI

Target: 100% of our inspected hospital locations to achieve 'Good' or 'Outstanding' ratings or the equivalent from regulators in England, Scotland and Wales – 98% in 2024 (2023: 98%)

## Progress in 2024

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 every day across all locations, delivering care and providing safety to patients. Currently 98% of our inspected hospital sites are rated 'Good', 'Outstanding' or the equivalent by health inspectors in England, Scotland and Wales. Both hospitals in Edinburgh and Spire Clare Park in Farnham were rated 'Good' overall in 2024. We are still awaiting reinspection of Spire Alexandra in Kent which has not been inspected by the Care Quality Commission since 2016/17.

100% of Vita Health Group locations inspected by CQC are rated 'Good'.



For more information, see **Building on quality** on **page 25**

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Hospitals

Operate responsibly

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

KPI

Target: 80% of employees stating they are proud to work for Spire Healthcare – 76% in 2024

Target: 80% of private patients rating their overall experience as 'very good' – 82% in 2024

Target: 80% of consultants who rate the care given to their patients by our hospitals as either 'excellent' or 'very good' – 84% in 2024

In 2024, six hospitals met all three of these criteria (2023: 7), 34 hospitals met at least one (2023: 31) and 22 met at least two (2023: 16).

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## Progress in 2024

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 our hospitals the first choice for consultants, and to invest in the best people, facilities and equipment to achieve this.



For more information, see **Driving hospital performance, Building on quality and Invest in our workforce** on **pages 22 to 31**



Sustainability report continued



Group

Operate responsibly

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

### Initiatives

- Implemented PSIRF across the organisation
- 35 hospitals accredited by NJR with 25 gold awards
- 15 MQEM recognised chemotherapy units
- 14 hospitals JAG accredited


## Progress in 2024

We constantly seek to improve our standards of clinical and corporate governance, as quality sits at the heart of our 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.

In 2024 we implemented the Patient Safety Incident Response Framework (PSIRF), which promotes an improved 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. We have linked PSIRF to our QI programme and Freedom to Speak Up efforts to seek lasting learning and sustain a learning and open culture. This promotes colleague and patient engagement, and improved relationships.

We continue to actively contribute data to relevant registries such as the National Joint Registry (NJR) in 2024. In 2024, 35 Spire hospitals achieved the Quality Data Provider certificate, with 25 receiving the 'gold' award (2023: 31 and 19). Of 16 chemotherapy units, 15 are recognised with the Macmillan Quality Environment Mark (MQEM) accreditation (2023: 15) and we have 14 hospitals with accreditation by the Joint Advisory Group on endoscopy (2023:14)

In 2024, we remain fully compliant with the Independent Healthcare Providers Network's (IHPN) Medical Practitioners Assurance Framework (MPAF).

 For more information, see [Building on quality on page 25](#) and [Clinical governance and safety committee report on page 103](#)

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Group

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
- PSIRF implemented in all hospitals

## Progress in 2024

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 sites, and available for colleagues who work remotely, to whom colleagues can turn.

 For more information, see [Building on quality on page 25](#) and [Investing in our workforce page 29](#)

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Group

Operate responsibly

## Further develop our approach to controls around modern slavery

### Initiatives

- Reviewed third-party risk management solution
- Continued supplier and product rationalisation initiatives

## Progress in 2024

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 2024, we:

- Maintained our modern slavery due diligence process for new suppliers with an annual spend in excess of £1 million. There were no issues identified through this process
- Continued to apply 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
- 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
- Reviewed the merits of procuring a third-party supplier risk management solution and determined, at this stage, not to progress further as we considered our internal processes to be adequate



Spire Healthcare's Modern Slavery Act statement  
[investors.spirehealthcare.com/investors/modern-slavery-act-statement](https://investors.spirehealthcare.com/investors/modern-slavery-act-statement)

Vita Health Group's Modern Slavery and human trafficking statement  
[vitahealthgroup.co.uk/slavery-and-human-trafficking-statement](https://vitahealthgroup.co.uk/slavery-and-human-trafficking-statement)

Sustainability report continued



Hospitals

Operate responsibly

## Maintain and strengthen information governance and data security

### KPI

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

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

Onboard new security operations centre – by 2024

Define data strategy and implement modern data platform architecture – by 2024

### Initiatives

- Established a security programme of work to implement the NIST recommendations of 2023 with an ongoing programme of planned ‘must do’ interventions until end of 2025
- New security operations centre on-boarded
- Defined an enterprise-wide data strategy and are implementing a modern data platform architecture.
- Continued investments to strengthen and enhance security posture and overall cyber security strength
- Cyber security strategy and cyber operating model refreshed in line with digital strategy
- Architecture review board established, responsible for reviewing and approving the architectural aspects of new systems, ensuring adherence to defined security guidelines and principles
- Cyber risk retainer established with the world’s number one incident response provider
- Ransomware table-top exercise (TTX) conducted with executive committee and IT senior leadership team

## Progress in 2024

In 2024, we made significant strides in enhancing our cybersecurity posture, focusing on people, processes and technology to mitigate risk and strengthen information governance.

**Robust security foundation:** we successfully transitioned to the updated ISO27001:2022 standard, demonstrating our commitment to best-practice security management. We also maintain cyber essentials plus certification and full compliance with NHS data security and protection requirements.

**Proactive risk management:** we conducted independent security reviews and audits, leveraging industry-leading partners, to proactively identify and address potential vulnerabilities. We continuously benchmark our performance using the National Institute of Standards and Technology (NIST) framework, ensuring alignment with industry best practices.

**Enhanced governance and oversight:** the data strategy, governance and security committee provides robust oversight of our cybersecurity programme, reporting regularly to the audit and risk committee. This cross-functional committee ensures comprehensive consideration of data and security matters across the hospitals business.

**Strategic technology investments:** we deployed enterprise-grade security platforms and fully leveraged the advanced security capabilities within the Microsoft 365 suite, significantly enhancing our protection against sophisticated cyber threats.

**Strengthened expertise:** our internal cybersecurity team was expanded with experienced professionals, including the appointment of a group chief information security officer (CISO), and we established a cyber risk retainer with specialised threat intelligence experts. This combination strengthens our proactive threat detection, incident response and overall security posture to bring alignment and consistency for information security.



**Proactive threat intelligence:** we actively monitor threat intelligence from multiple sources, enabling us to anticipate and respond effectively to emerging cyber risks.

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.