



Policy levers for sustainable healthcare

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How can national bodies drive action on decarbonisation?

Governance and oversight

Legislative requirements, targets, monitoring of performance data, regulation

Funding

Incentive payments, penalties

Stewarding resources

Medicines & devices regulation, health technology appraisal, procurement frameworks

Shaping service delivery

National clinical guidelines, standards and strategies to improve the delivery of care

Source: Health Foundation (2024). Policy levers for a net zero NHS

Getting the national accountability arrangements right

“I hate a strategy and I hate a target. But that is the only thing that generates action.”

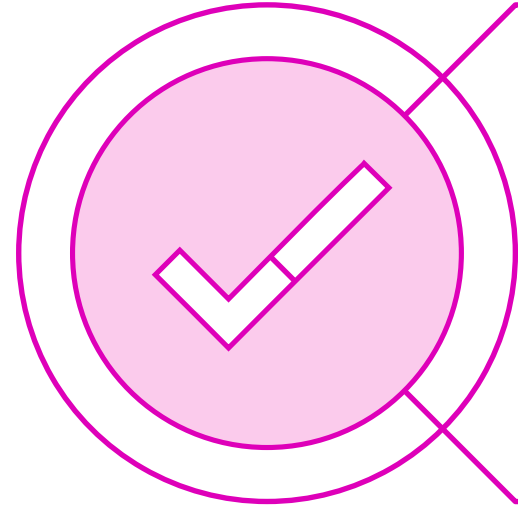
Trust non-executive director



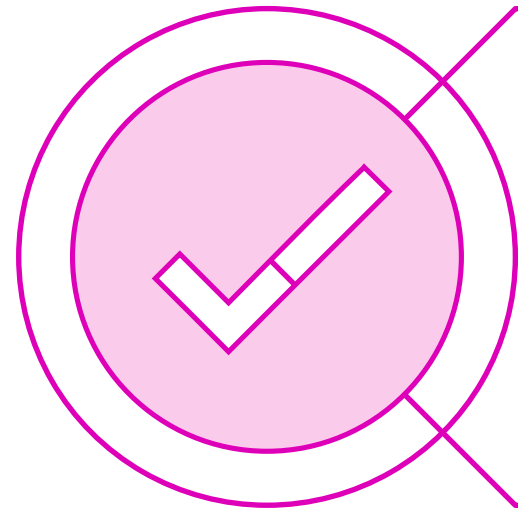
Existing accountability mechanisms

Mechanism	Description
NHS Standard Contract	<ul style="list-style-type: none">• Sustainability = contractual obligation for NHS providers.• Requirements include appointing a board-level lead and producing a green plan.• NHSE sets it → ICBs hold trusts to account for meeting requirements.
Green plans	<ul style="list-style-type: none">• Trusts + ICBs need a board-approved green plan (refreshed every 3-5 yrs & published on website).• NHSE publishes statutory guidance on creating these.• Regional sustainability leads play a role in assuring delivery.
Internal governance	<ul style="list-style-type: none">• Trusts + ICBs must present green plans to their boards for approval.• The must provide annual progress update.
Quarterly data returns	<ul style="list-style-type: none">• ICBs + trusts required to submit a range of data to the GNHS team quarterly.• Data shared back with ICBs + trusts via the 'GNHS Dashboard' (which also uses wider data returns).
Care Quality Commission	<ul style="list-style-type: none">• Sustainability is included in the CQC's assessment framework for acute hospital inspections through a quality statement in the 'well-led' domain.

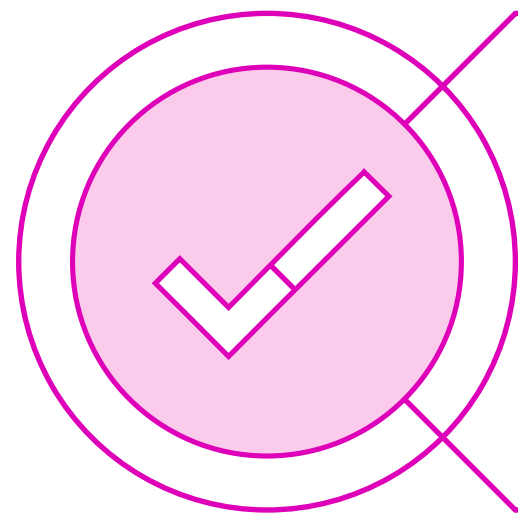
Strengths of current accountability arrangements



The supportive approach involving engagement, education and guidance **has helped to build awareness and buy-in.**



Harder-edged requirements have been progressively introduced in recent years, e.g. in 2025 update to green plan guidance.



There are notable successes since 2020 e.g. 33% reduction in emissions from anaesthetic gases and inhalers.

Limitations of current accountability arrangements

Despite the existence of statutory environmental requirements, accountability for meeting these requirements is not sufficiently strong in practice because sustainability is often deprioritised compared with other NHS goals

- 1 Limited external scrutiny or consequences
- 2 Internal accountability relies on senior leadership support, which varies significantly
- 3 Long-term targets may not lead to prioritisation or create urgency
- 4 Metrics for measuring progress have significant technical limitations
- 5 Responsibility for sustainability often falls to individuals or small teams
- 6 Insufficient specificity in requirements and roles
- 7 Wider constraints mean that accountability does not always lead to prioritisation and action
- 8 Limited accountability for sustainability in primary care
- 9 Lack of narrative and education accompanying accountability

10 recommendations for driving faster progress

These recommendations fall into two broad categories:

1 - Strengthening existing sustainability-specific accountability mechanisms

2 - Embedding sustainability into wider NHS accountability frameworks

Alignment with clinical priorities

1. PREVENTION

Promoting health and preventing disease by tackling the causes of illnesses and inequalities

3. LEAN SERVICE DELIVERY

Streamlining care systems to minimise wasteful activities



2. PATIENT SELF-CARE

Empowering patients to take a greater role in managing their own health and healthcare

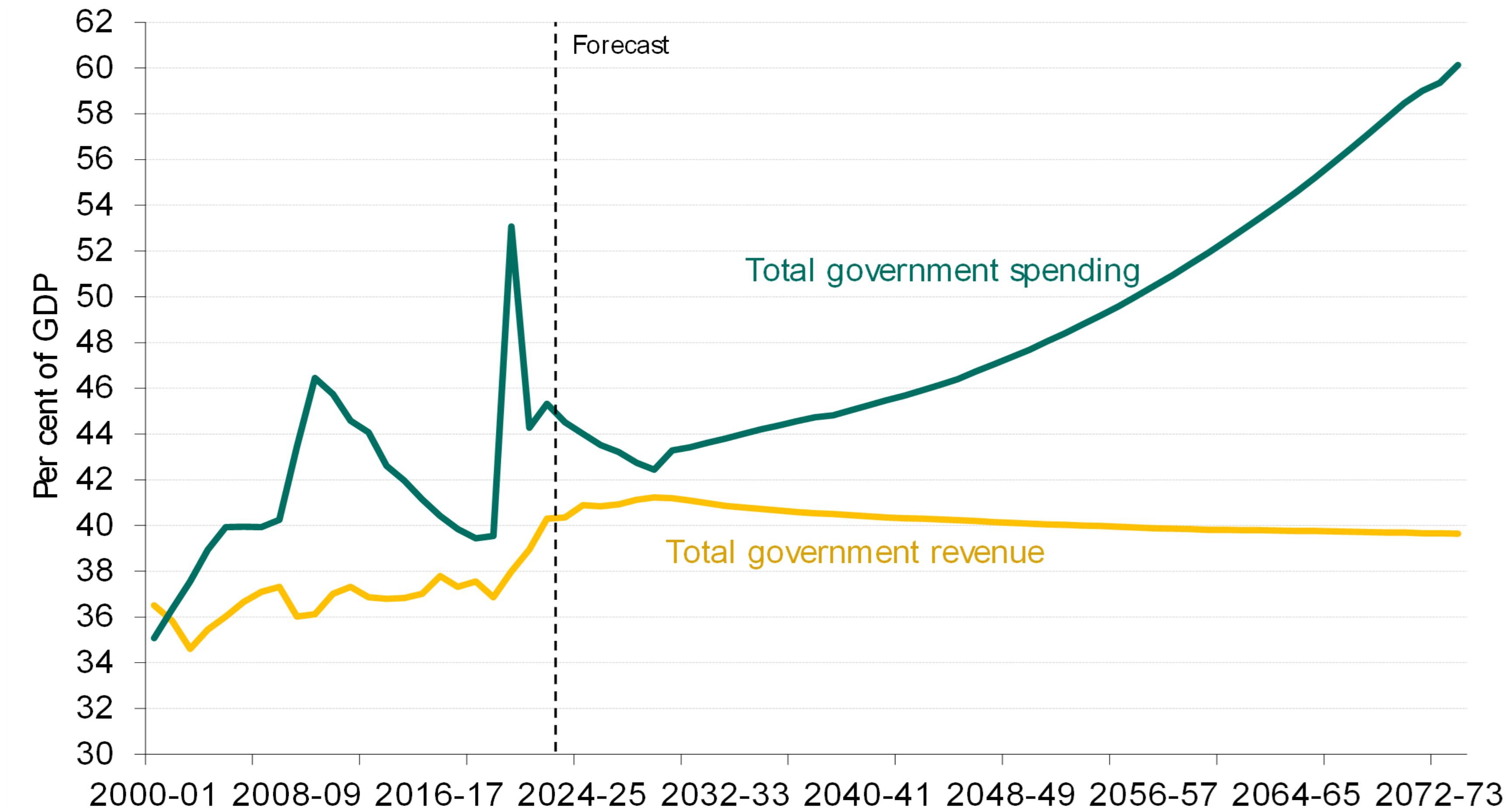
4. LOW CARBON ALTERNATIVES

Prioritising treatments and technologies with a lower environmental impact

Mortimer, F. The Sustainable Physician. Clin Med 10(2). April 1, 2010. D110-111.



Alignment with financial sustainability



Source: ONS, OBR

1: Strengthening sustainability-specific accountability mechanisms

- 1 Build on and reinforce the work of GNHS, including through a new statutory duty for the SoS for Health and Social Care.
- 2 Define clearer responsibilities for board-level leaders in trusts and integrated care boards.
- 3 Introduce annual sustainability performance checks led by regional leads.
- 4 Make as much performance data as possible publicly available in a consistent and accessible format
- 5 Identify a small set of high-impact priorities to increase focus at the local level.
- 6 Work towards organisation-specific carbon reduction trajectories for each trust and ICB.

2: Embedding sustainability into wider NHS accountability frameworks

- 7 Embed sustainability in wider performance management processes at the regional level.
- 8 Ensure national accountability mechanisms used for other priorities drive changes that are aligned with sustainability.
- 9 Ensure the Care Quality Commission's new assessment frameworks lead to greater prioritisation of sustainability in providers.
- 10 Make sustainability part of the national vision for a high-quality NHS by communicating the benefits for patients, staff and public finances.

Thank you

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