

Including Adaptation in your Green Plan - guidance for NHS organisations



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Including Adaptation in your Green Plan – Guidance for NHS Organisations

Summary

This article describes how, as an NHS organisation, you can include climate change adaptation in your Green Plan. A [downloadable Adaptation Plan Template is available here](#) and is an example of how you can lay out a climate change risk assessment and adaptation plan, with reference to a range of tools you can use (also available through WeAdapt under the [tag #NHSadapts](#)) to produce these.

Introduction - how do I write an adaptation plan?

Whilst the third iteration of the Government's [National Adaptation Programme](#), published in July 2023, does include some mention of adapting the NHS including asking you to summarise your adaptation plans in the Green Plan, as of summer 2024 there is little guidance specifically on how the NHS should carry out climate change risk assessments or produce an adaptation plan, or what this should look like.

Whilst not produced by the NHS, a not-for-profit in the West Midlands has produced an open-source tool for building resilience to Climate Change into health care systems, with a focus on the NHS in England. The tool, called *Adapt to Survive*, was produced by [Sustainability West Midlands](#) in collaboration with the Environment Agency and can be accessed for [free online here](#).

For what an Adaptation Plan should actually look like, Sustainability West Midlands have now produced a Climate Change Adaptation Plan Template which is free, open-source, and can be downloaded from the resource section in this Article.

This was produced as part of a project in partnership with [Sniffer](#), [NHSE North West](#), [NHSE North East and Yorkshire](#), and [NHS Greater Manchester](#). To learn more about this project, and to access the other resources produced please search for the tag [#NHSadapts](#) on the [weadapt website](#).

The Adaptation Plan Template includes references to [Adapt to Survive](#), a Climate Adaptation Framework (also produced as part of the aforementioned project), and other free online resources on climate change and adaptation.

The template also touches on how to include adaptation in your Green Plan, but this document expands on this, providing further detail on the purpose of the Green Plan, what you could include on adaptation, and suggestions on how to do this.

Please note: The following advice is recommendations produced by SWM and Sniffer, fed into by partners within the NHS. Whilst it refers specifically to guidance from NHSE and makes an effort to elaborate on or further explain this, it is not official NHSE guidance or regulation. You should ensure that you are informed of the specific regulatory expectations of you and your organisation before submitting plans.

Context - the purpose of the Green Plan

In October 2020, the Greener NHS National Programme published its new strategy, [Delivering a net zero National Health Service](#). The [2021/22 NHS Standard Contract](#) set out the requirement for trusts to develop a Green Plan to detail their approaches to reducing their emissions in line with the national trajectories. Integrated care systems (ICSs) are expected to develop their own Green Plan, based on the strategies of its member organisations.

The three outcomes of Green Plans should be to:

- Ensure every NHS organisation is supporting net zero
- Prioritise interventions as well as improve patient care and community wellbeing while tackling climate change and broader sustainability issues
- Support to plan and make prudent capital investments whilst increasing efficiencies

Current Green Plan Guidance

The NHS have published [Green Plan guidance](#). Below is an overview of the key points in this guidance:

- There are seven sections: Digital Transformation; Travel and Transport; Estates and Facilities (inc. building design and refurb); Medicines; Supply chain and procurement; Food and nutrition; and **Adaptation**
- Your Green Plan as an NHS **Trust** must be submitted **every three years**
- Your plan has to be **approved** by your organisation's board/governing body
- **Integrated Care System (ICS)** strategies should be submitted **every six years** and summarise the Green Plans of relevant member organisations, while also commenting on system-wide priorities and co-ordination and include integration of Trust Green Plans with the efforts of primary care, local authorities and other local care partners
- The recommended process includes using **SMART actions**, processes for **reporting**, reviewing your progress, taking into account **national targets**, and engaging with **stakeholders**

The guidance on including adaptation is as follows:

“This section should **summarise** your organisation's **plans to mitigate the risks** or effects of climate change and severe weather conditions on its business and functions. This may include plans to mitigate the effects of **flooding** or **heatwaves** on the organisation's infrastructure, patients, and staff.”

So what should I include in my Green Plan?

Please note: The following advice is recommendations produced by SWM and Sniffer, fed into by partners within the NHS. Whilst it refers specifically to guidance from NHSE and makes an effort to elaborate on or further explain this, it is not official NHSE guidance or regulation. You should ensure that you are informed of the specific regulatory expectations of you and your organisation before submitting plans.

Including Adaptation in your Green Plan

You should start by stating whether you have a climate change risk assessment and/or adaptation plan.

- **If not, state when you are intending to produce one by**
- **If you do, state when they were last updated/published**
- **State who (if anyone) is involved in/responsible for producing them, reviewing them, and implementing the plan**

Throughout the [Adaptation Plan Template](#), pieces of information are highlighted as things you could include in your Green Plan, either as they are or summarised. Below is a repeat of this information in one place. Even if you do not use this Adaptation Plan Template, you should be able to use this list to help guide what you should include in your Green Plan on climate change adaptation.

1. An overview of climate projections for your site and communities
2. A summary of the climate risks posed
3. Your current progress on adaptation
4. A summary of the very high priority actions from your adaptation plan
5. Other guidance throughout the green plan related to adaptation

An overview of climate projections for your site and communities

In the Adaptation Plan Template there is guidance on finding projections of the change in climate expected in the locations of your sites and communities including temperature change and flood risk. If you have not yet looked at local climate projections or identified the likelihood of hazards locally, you can use the national summaries from the [UK Climate Change Risk Assessment](#) (UKCCRA) from the Climate Change Committee (CCC).

A summary of the climate risks posed

As above, these can be from your own risk assessment, or if you have not done one, you can use the summary of national risks to healthcare from the [Health and Social Care Briefing](#) from the CCC, find regional projected impacts using the [Local Climate Adaptation Tool](#), and/or check whether any regional risk assessments have been carried out in your area, for example by your local authority or a [Local Resilience Forum](#).

Your current progress on adaptation

In the template we suggest to outline any previous adaptation plans, objectives, or commitments made and to measure and evaluate your progress on these.

We also recommend including some case studies of adaptation you have carried out so far, or include here some evidence of adaptation planning you have been carrying out or adaptation networks you are a part of.

You could include here a measure of your 'Adaptation Capability Maturity', which you can explore in the Climate Adaptation Framework produced by Sniffer and Sustainability West Midlands with partners from GreenerNHS North West and Yorkshire, GreenerNHS North East, and NHS Greater Manchester (find this under the tag [#NHSadapts](#) on weadapt).

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A summary of the very high priority actions from your adaptation plan

This space is an opportunity for you to provide an overview of the main actions you are currently focussed on carrying out to progress your adaptation work. These come from the section 'Adaptation Action Plan' in the Adaptation Plan Template.

If you do not yet have a plan or actions, you could include here the very high priority impacts you feel are the biggest risk to you and therefore need addressing.

Other guidance throughout the green plan related to adaptation

A few things that the Green Plan Guidance provided by GreenerNHS asks for have been touched on in the Adaptation Plan Template as they are related to adaptation. There are:

“pertinent demographic and socioeconomic details of the local populations served.”

If you have maps with demographic and socioeconomic information that are relevant to your risk assessment and adaptation plan, you can include these here.

“What specific improvements would most benefit your local communities, staff and the overall organisation?”

This is very relevant to your adaptation plan, as knowing the areas that are most at risk from climate change and adapting to these can support communities in being safer and healthier, and support your sites to be more resilient.

“Sustainable models of care”

In the Adaptation Plan Template, it is explained that a truly sustainable model of care should include considering opportunities for adaptation in the way care is delivered.

Governance details “operation of sustainability committees and working groups; development of online sustainability training and pledge platforms for staff; and investment in specific staff to support sustainability goals.”

If you already have governance for adaptation in place, then you can include details of this in a governance section of the Green Plan Guidance. The Adaptation Plan Template also suggests that you consider including details of any appraisal processes you have in the governance section of your Green Plan (in general or within adaptation). By appraisal, the template is referring to including your reasoning for the actions you have chosen. “if you set out an appraisal process (formal or informal), this can be a good way to justify your planning and to help others within and outside your organisation to do their own appraisal”.

Linking the information in your Green Plan to other NHS themes and policies.

One way to achieve this could be to create a table that shows different themes and the relevant policies and strategies you have (internally and beyond). The Adaptation Plan Template has a full example, below is a taster:

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	Net Zero	Climate Adaptation	Health Inequalities	Air Pollution	Emergency Planning
Adverse Weather Health Plan		✓			✓
Community Engagement plan	✓	✓	✓		✓
Local Resilience Forum plans or reports					✓
Net Zero Plans	✓		✓	✓	
This Climate Adaptation Plan		✓	✓		

1 A sample table showing different themes relevant to the NHS (Net Zero, Climate adaptation, Health inequalities, Air Pollution and Emergency Planning) and some policies and strategies these relate to (Adverse Weather Health Plan, Community Engagement Plan)

Adaptation Reporting Guidance

As well as the Green Plan, there is mention of when and how to report on adaptation within other NHS reporting guidance. Below is some of that guidance summarised and split into organisation type, but you should always check your own statutory reporting requirements.

All DHSC group bodies

As per the [Mandatory annual reports and accounts guidelines](#) for the Department of Health and Social Care (DHSC) group bodies, clinical commissioning groups, NHS trusts, NHS foundation trusts and arm's length bodies are now required to include some of the **task-force on Climate-Related Financial Disclosures (TCFD) in their annual reporting.**

It is advised that you read the guidance related to this in:

- Chapter 3 Annex 5 in the [Group Accounting Manual 2023-24](#)
- the [HM Treasury Application Guidance](#)
- the [TCFD's guidance](#) on implementing their recommendations

For further advice, [this briefing](#) on the Healthcare Financial Management Association (HFMA) website shares more about what NHS organisations must report in 2023/24, along with good practice in sustainability reporting going forward. NHS Property Services published their first Climate-Related Financial Disclosure Report in November 2023, information on which can be [found on their website.](#)

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NHS Property Services

As per the [NHS standard contract for NHS providers](#): NHS Providers are required to “adapt the Provider’s Premises and the manner in which Services are delivered to reduce risks associated with climate change and severe weather”.

NHS Property Services is also developing new reporting metrics to ascertain the extent overheating impacts their portfolio. They reference guidance from outside of the NHS for vulnerability assessments ([WHO](#), [Climate Just](#)).

Integrated Care Boards (ICBS) / NHS commissioning organisations

NHS commissioning organisations have a legal duty under the NHS Act 2006 to make arrangements for the public to be involved in:

- “the planning of services
- the development and consideration of proposals for changes which, if implemented, would have an impact on the manner or range of services, and
- decisions which, when implemented, would have such an impact.”

This duty will be relevant to Adaptation Planning and Delivery as many adaptation measures are likely to result in changes to services. You can find out more about this on the [annual reports guidance on NHSE’s website](#).

NHS Foundation Trusts

The [NHS Foundation Trust Annual Reporting Manual](#) includes a model annual governance statement for Trusts to use. The 2023-24 version now includes a sentence on climate change: “The foundation trust has undertaken risk assessments on the effects of climate change and severe weather and has developed a Green Plan following the guidance of the Greener NHS programme. The trust ensures that its obligations under the Climate Change Act and the Adaptation Reporting requirements are complied with.”

Guidance from GreenerNHS

The Third Health and Care Adaptation Report, published by [GreenerNHS to the Adaptation Reporting Power](#), lays out some of the ways they aim to support NHS organisations to adapt to climate change. Some key points are:

- Service Delivery (SD) point 3: “The CQC will identify sites that trigger risk assessments from overheating and include this in its national reporting.”
- SD4: “All ICSs will build long-term adaptation planning into their Green Plans by 2025.”
- SD5: “National Estates and Facilities team will work with all trusts at risk of flooding to plan for future flooding events...In particular, the team will complete their identification of vulnerable sites and support sites to move critical infrastructure out of basements, beginning with those trusts most at risk.”
- LWR (Leadership, workforce development and resourcing) point 5: “All ICS net zero board-level leads...will be accountable for adaptation planning and overseeing prioritisation and implementation of adaptation actions.”

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- LWR6: “Each ICS will identify all sites with evidenced overheating risk to ensure investment in new buildings or retrofitting including passive and active cooling measures.”
- LWR7: “NHS and the UKHSA will deliver cross-health e-learning modules for the health workforce on climate change adaptation and mitigation.”

Public Sector Sustainability Reporting Guidance

The [Public Sector Sustainability Reporting Guidance](#) is **not** statutory for NHS bodies. It can be useful to be aware of the reporting guidance, and the 2022-23 guidance document says that public bodies “outside of the scope of Greening Government Commitments (GGCs) may choose to follow this guidance for their sustainability reporting either where there’s alignment or where they have flexibility”. The key points eligible organisations must report on regarding adaptation are:

- A **general statement** giving assurance that action has been taken to ensure that those **policies with long term implications are robust** in the face of changing weather, extreme events and sea level rises from climate change”
- “Any follow up actions to last year’s report and highlight key policies affected by impacts from climate change and how these have been addressed.”
- “The reporting format must provide minimum information requirements (including nil returns) and comparisons of data for at least the previous three years (as it becomes available) [including adaptation]”.

Suggestions for doing this are: “To inform adaptation planning and decision making, entities are invited to make use of the [Climate Change Risk Assessment published in 2017](#), and the new [UK Climate Projections \(UKCP18\) published in November 2018](#)” and “Where relevant, organisations may wish to note actions and policy set out in the current [National Adaptation Programme \(NAP\)](#).”

In Scotland, public bodies are required to complete annual climate change reports. See full guidance on this in [this report from the Sustainable Scotland Network](#), and see [Adaptation Scotland’s website](#) for more Climate Change Risk Assessment Guidance.

Further Guidance

This article is part of a wider project for developing adaptive capacity in the NHS. This was carried out in 2024 by two not-for-profit organisations (Sniffer and Sustainability West Midlands) in partnership with NHSE North East & Yorkshire, NHSE North West, and NHS Greater Manchester. For further guidance on Adaptation for the NHS, see the range of other resources and outputs from this project here on the weadapt website under the tag [#NHSadapts](#).