



Sustainability reporting in the NHS 2023/24 and beyond

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Summary

The briefing sets out the NHS environmental sustainability commitments and reporting requirements across the United Kingdom, what NHS organisations must report in 2023/24, along with good practice in sustainability reporting for NHS organisations in 2023/24 and beyond.

It also looks ahead at future developments, the role of the finance function and how you can get involved in supporting the agenda.

Introduction

There is no doubt environmental sustainability is a key challenge for everyone. The Conference of Parties (COP) 28 included its first ever health day with a [declaration on climate and health](#)¹ recognising the urgency of taking action on climate change and emphasising the need to build climate-resilient and low-carbon health systems, to protect the health of both planet and people. As Amanda Pritchard, NHS England chief executive, [writes](#)² in explaining the NHS net zero commitments,

'Climate change is a health emergency, as well as an environmental emergency.'

Amanda Pritchard, NHS England chief executive

Each of the four nations of the UK has net zero targets; sustainability reporting is therefore a key mechanism to manage progress towards achieving them. In the private sector, sustainability reporting is increasingly important to investors and stock exchanges, while in both the private sector and public sector it is important to support decision-making and accountability.

As a result, sustainability reporting is an area of increased focus across the accountancy profession and is expected to increase in prominence over the coming years.

The current sustainability reporting landscape is complicated, with different government departments responsible for different policies. Sustainability reporting requirements, and the planned timing of implementation, varies across the private sector and public sector, as well as across different parts of the public sector itself.

2023/24 is the first year that public sector bodies will be required to include some of the task force on climate-related financial disclosures (TCFD) in their annual reports. This is the first of three phases that will result in TCFD compliance, as adapted for the public sector, by 2025/26.

The role of the finance function in driving effective sustainability reporting is critical, not only in meeting mandatory requirements but leading the way in driving sustainability reporting and sharing best practice.

The aim of this briefing is to signpost finance directors, sustainability leads, non-executive directors and all those interested in the environmental sustainability agenda to guidance and reporting requirements that are, or may become, relevant to the NHS.

The briefing sets out the NHS environmental sustainability commitments and reporting requirements across the United Kingdom, what NHS organisations must report in 2023/24, along with good practice in sustainability reporting for NHS organisations in 2023/24 and beyond. It also looks ahead at future developments, the role of the finance function and how you can get involved in supporting the agenda.

NHS environmental sustainability commitments

There is a clear commitment to improving environmental sustainability in the NHS across the United Kingdom, as set out in legislation, strategies and guidance. As shown in **figure 1**, each of the four nations has ambitious targets to reduce carbon emissions.

Figure 1: NHS carbon emissions targets

England Delivering a net zero national health service ³

- reduce the emissions they control directly to net zero by 2040, with an ambition to reach an 80% reduction by 2028 to 2032
- reduce the emissions they can influence to net zero by 2045, with an ambition to reach an 80% reduction by 2036 to 2039

Scotland Climate Emergency Sustainability Strategy⁴

- to become a net zero greenhouse gas emissions health service by 2040 or earlier where possible

Northern Ireland Climate Change Act (Northern Ireland) 2022⁵

- contribute to the target for Northern Ireland to be net zero by 2050, reducing emissions by 48% for 2030 and 100% by 2050
- different baseline years have been set for different greenhouse gases

Wales NHS Wales decarbonisation strategic delivery plan⁶

- contribute to the ambition for the public sector in Wales to be collectively net zero by 2030
- decarbonisation targets of 16% by 2025 and 34% by 2030 reduction compared to the 2018/19 position

England

In October 2020, the NHS in England became the world's first health service to commit to reaching carbon net zero. Along with targets set out in *Delivering a net zero national health service*, environmental sustainability requirements in England are reflected in the following:

- The [Health and Care Act 2022](#)⁷ statutory requirements to specifically contribute towards:
 - the environmental targets within the [Environment Act 2021](#)⁸
 - the UK net zero emissions target and adaptations to any current or predicted impacts of climate change identified within the [Climate Change Act 2008](#)⁹
- [Net zero supplier roadmap](#)¹⁰ including requirements for:
 - all NHS procurements to include a minimum 10% net zero and social value weighting¹¹ by April 2022
 - contracts with the NHS above £5 million per annum from April 2023, and all procurement from April 2024, to require suppliers to publish a carbon reduction plan.
- The [NHS standard contract](#)¹² mandates a range of targets relating to sustainability, including that all providers have a board approved green plan.
- NHS England's [Greener NHS programme](#)¹³ is in place to support this transformation.

Scotland

The [Climate Change \(Scotland\) Act 2009](#)¹⁴ and the [Climate Change \(Emissions Reductions Targets\) \(Scotland\) Act 2019](#)¹⁵ sets the statutory framework for reductions in greenhouse gas emissions. In order to comply with these legal requirements, NHS Scotland has produced the [Policy for NHS Scotland on the global climate emergency and sustainable development](#)¹⁶, underpinned by the [NHS Scotland climate emergency and sustainability strategy 2022-2026](#)¹⁷.

NHS Scotland's policy aims are to ensure that it:
contributes to the achievement of the United Nation's [Sustainable development goals](#)¹⁸

- becomes a net-zero greenhouse gas emissions health service by 2040 or earlier
- ensures assets and activities are resilient to the impacts of a changing climate
- establishes a culture of stewardship, where natural resources are safeguarded and responsibly used to provide environmentally sustainable healthcare
- is part of the circular economy through designing out waste and pollution, keeping products and materials in use and contributing to the regeneration of natural systems
- increases its contribution to tackling the ecological emergency and restoring biodiversity.

To underpin these policy aims, the Scottish government has included climate and environment as delivery priorities in the *NHS Scotland delivery plan guidance 2024/25*¹⁹. Priorities for NHS boards should be included in their medium-term (three-year) and annual delivery plans.

Northern Ireland

The *Climate Change Act (Northern Ireland) 2022*²⁰ Northern Ireland departments must ensure that net emissions for 2030 are at least 48% lower than the baseline and that the net emissions for 2050 are at least 100% lower than the baseline. The Act sets different baseline years for different greenhouse gases ranging from 1990 to 1995.

In addition to and predating the Climate Change Act, Northern Ireland also has an *Energy management strategy and action plan to 2030*²¹, which public bodies should adhere to. This includes the adoption of a net energy consumption reduction target of 30% by 2030.

Wales

The Welsh Government declared a climate emergency in 2019 and has set the ambition for the public sector in Wales to be net zero by 2030. In March 2019 the First Minister for Wales launched *Prosperity for all: a low carbon Wales*²², setting out Welsh Government's plan for decarbonisation.

The *NHS Wales decarbonisation strategic delivery plan*²³ demonstrates how NHS Wales will respond to the climate emergency. It sets out 46 initiatives and targets for the decarbonisation of NHS Wales that will be assessed and reviewed in 2025 and 2030. This includes the decarbonisation targets set out in **figure 1** above.

The *Well-being of Future Generations (Wales) Act 2015*²⁴ places duties on Welsh health bodies (and other authorities) to improve the social, economic, environmental and cultural well-being of Wales. Addressing climate change is key to meeting this duty. Further detail is included in HFMA's briefing, *Integrated reporting in the context of the Well-being of Future Generations Act*²⁵.

Sustainability reporting requirements

To support effective sustainability decision-making and accountability, information is needed to measure progress against targets. Sustainability reporting allows organisations to understand their current position and compare themselves to targets, both over time and with other organisations.

As CIMA observed²⁶

‘organisations can’t manage what they don’t measure and can’t build trust with their stakeholders unless they provide consistent, comparable information on a variety of metrics, including sustainability metrics.’

Sustainability reporting for the future

There is a range of guidance applicable to different organisations and at different times as set out below. The [2024 HFMA pre-accounts planning conference session on environmental reporting requirements for NHS bodies²⁷](#) is available to watch on the HFMA website.

Commercial and private sector requirements

UK mandatory climate-related financial disclosure requirements²⁸

Companies and limited liability partnership regulations include requirements that strengthen environmental, social and governance (ESG) reporting. They require disclosure, where material, of how climate change is addressed in corporate governance; the impacts on strategy; how climate-related risks and opportunities are managed; and the performance measures and targets applied.

The regulation’s requirements are aligned with the [recommendations issued by the TCFD²⁹](#). This sets out recommended disclosures across four thematic areas or pillars:

- governance
- strategy
- risk management
- [metrics and targets³⁰](#).

These requirements, as adapted for the public sector, will be applied from 2023/24 (see further detail in the NHS 2023/24 reporting requirements section below).

Global reporting initiative (GRI) standards³¹

The GRI standards are a modular system of interconnected standards to help organisations report the impacts of their activities towards sustainable development. They are designed to enable any organisation to understand and report on their impacts across the economy, environment, and people in a comparable and credible way to increase transparency on their contribution to sustainable development.

Although the use of GRI is not an NHS requirement, there are ambitions to develop [sector-specific measures for healthcare](#)³² in the future.

IFRS S1 and IFRS S2

*IFRS S1 General requirements for disclosure of sustainability-related financial information*³³ was issued by the International Sustainability Standards Board (ISSB) in June 2023 and has an effective date of 1 January 2024. *IFRS S2 Climate -related disclosures*³⁴ is effective for annual reporting periods beginning on or after 1 January 2024 with earlier application permitted as long as IFRS S1 is also applied.

The UK government has established the [UK Sustainability Disclosure Technical Advisory Committee](#)³⁵ (TAC) to assess IFRS S1 and IFRS S2 on a technical basis and to provide independent recommendations on their endorsement to the secretary of state for the Department of Business and Trade. Members of the committee include the UK Endorsement Board, which endorses IFRS Accounting Standards for use by UK companies. The TAC's call for evidence closed in October 2023.

Neither IFRS S1 nor IFRS S2 have yet been endorsed by the secretary of state for use by UK companies, so are not yet mandated for use.

Following consultation in 2022, the International Public Sector Accounting Standards Board (IPSASB) is also considering plans to develop a [public sector specific sustainability reporting](#)³⁶ framework.

Public sector requirements

HM Treasury and the Financial Reporting Advisory Board (FRAB) are monitoring developments by standard setters, as well as in the private sector, to consider and advise on a future sustainability-related reporting strategy for the UK public sector.

Greening government commitments 2021 to 2025³⁷

The *Greening government commitments (GGC) framework* includes targets on greenhouse gas emissions, waste and water consumption, as well as commitments on procurement, nature recovery, climate adaptation and information and communication technology.

They are applicable to central government departments and their agencies. NHS bodies are excluded from the scope of these.

HM Treasury's [Financial reporting manual](#)³⁸ (FReM) and sustainability reporting guidance

The 2024/25 FReM refers to mandatory sustainability reporting requirements including the impact of the entity's business on the environment and reporting on climate change adaptation. It also refers to the [Sustainability and environmental reporting guidance](#)³⁹, for use in central government. It outlines the minimum statutory reporting requirements, some best practice examples, and underlying principles to be adopted.

The FReM does inform the contents of the various accounting manuals that NHS bodies across the UK are required to comply with, and so informs the contents of the manuals for all four nations. These are set out further below.

NHS 2023/24 reporting requirements

The main changes to the 2023/24 FReM are focussed around the sustainability reporting in relation to the [TCFD aligned disclosure application guidance](#). Phase one is a high level overview of the governance of an organisation, and the recommendation within the governance pillar of the TCFD framework is that the accounts include disclosure of the organisation's governance around climate change related risks, and opportunities. Recommended disclosures are that the board's oversight of climate-related risks and opportunities is described, along with management's role in assessing and managing climate-related risks and opportunities. Where data is already available, metrics and targets can be specified. This Treasury guidance describes best practice, so is equally valid across the four nations of the United Kingdom.

The TCFD guidance itself does not automatically apply to local government, NHS bodies (trusts, foundation trusts and integrated care boards), or entities in devolved administrations. However, relevant authorities, such as the DHSC may direct entities to follow the guidance, as set out or in an adapted form, and it is considered best practice.

The guidance will be implemented in phases, with phase one applying to English accounts from 2023/24, with the other nations and phases to follow.

England

NHS bodies that have more than 500 full-time equivalent employees or have total operating income of more than £500m will be required to comply with the first of three phases of TCFD in 2023/24.

The new disclosure requirements will be incorporated into the [2023/24 GAM](#)⁴⁰ after the [2024/25 GAM consultation process](#)⁴¹ (closing March 2024). These requirements

are already included in the *NHS foundation trust annual reporting manual*⁴² Annex 7 and the consultation draft of the GAM 2024/25. Bodies are required to follow the TCFD requirements on a comply or explain basis. From 2023/24 entities should describe the board's oversight of climate-related issues and describe management's role in assessing and managing climate-related issues.

Confirmation of the changes incorporated into the GAM covering 2023/24 will be included as part of the April 2024 *additional guidance*⁴³ update.

As previously required, progress against targets set out in each NHS body's *green plan*⁴⁴, where one is required, also need to be included in the annual report. This is in addition to the existing disclosure requirements in the performance analysis section of annual report covering 'information about environmental matters, including the impact of the entity's business on the environment.'

Preparers may also cross-refer to disclosures elsewhere in the annual report such as the annual governance statement or other content such as green plans rather than duplicate this material in this section of the annual report.

This allows for significant flexibility by NHS bodies in terms of the level of detail they report.

The NHS standard contract also stipulates (service condition 18.2) that providers must maintain and deliver a green plan, approved by their governing body, in accordance with guidance and must:

- provide an annual summary of progress on the delivery of that plan
- nominate a net zero lead and ensure that the co-ordinating commissioner is kept informed at all times of the person holding this position
- publish in its annual report quantitative progress data, covering as a minimum greenhouse gas emission in tonnes, emissions reduction projections and an overview of the provider's strategy to deliver those reductions.

Green plan requirements for trusts and integrated care systems are provided by Greener NHS.

As reflected in model *annual governance statements 2023/24*⁴⁵, NHS bodies are also required to include reference to risk assessments undertaken and plans in place which take account of the *Delivering a net zero national health service report*⁴⁶ and compliance with obligations under the Climate Change Act and the adaptation reporting requirements.

Scotland

NHS health boards are required to prepare their accounts in accordance with the *Scottish public finance manual*⁴⁷ which is consistent with the FReM. There are no TCFD changes in place for 2023/24.

The *Climate Change (Duties of Public Bodies: Reporting Requirements) (Scotland) Amendment Order 2020*⁴⁸ requires NHS boards to report on their progress in delivering their emissions reduction targets. All NHS boards are required to submit an annual report to the Sustainable Scotland Network detailing compliance with the climate change duties imposed by the Climate Change Act and the amendment order.

The information returned by the board is compiled into a [national analysis report](#)⁴⁹, published annually.

In addition, health boards are required to report on their progress against NHS Scotland's climate and sustainability aims on an annual basis under [A policy for NHS Scotland on the climate emergency and sustainable development](#)⁵⁰. Since November 2022, each health board has been required to publish an annual report, approved by its chief executive, summarizing its progress against the aims and targets set out in the policy, and the actions set out in [this strategy](#)⁵¹.

Audit Scotland is developing a programme of work on climate change. For [2023/24 audits](#)⁵², Audit Scotland intends to carry out the following activities relating to climate change in the short term:

- an overall approach to auditing climate change will be developed.
- a central review of disclosures related to climate change in public bodies' 2022/23 annual accounts will be carried out by Innovation and Quality (I and Q) and shared in a good practice note.
- I and Q will continue to participate in discussions around the development and implementation of new climate change financial reporting standards and will keep auditors apprised of progress.
- I and Q will liaise with the firms to benefit from their experience of auditing climate change in the private sector.

Northern Ireland

The [2023/24 Government financial reporting manual](#)⁵³ for Northern Ireland mirrors the guidance in the GAM as above. There are no TCFD changes in place for 2023/24.

Wales

The format and presentation of statutory accounts are prescribed by NHS Wales and are based on the guidance in the FReM. In accordance with the FReM, Welsh health bodies publish sustainability information within their annual report, comprising high-level overviews of the impact of the entity's business on the environment and their work on environmental matters.

In addition, and outside of annual reporting, Welsh public sector bodies including health bodies must report their well-being and sustainable development plans and progress to the auditor general. The auditor general undertakes examinations⁵⁴ of the extent to which public bodies have applied the sustainable development principles (from the Well-being of Future Generations Act) when setting and prioritising their well-being objectives.

Sustainable development plans must also be shared with the future generations commissioner and [NHS Wales' planning framework](#)⁵⁵ requires organisations to produce a three-year integrated medium-term plan (IMTP) covering the period 2022 to 2025. The IMTP should provide examples of specific projects and demonstrate how organisations are contributing to policies such as the [NHS Wales decarbonisation](#)

strategy delivery plan. Welsh NHS bodies must report delivery, against their IMTP, to the Welsh government.

Good practice reporting

Good practice sustainability reporting should provide the information the reader needs, such as clear and timely information they need to understand the position on environmental sustainability and drive improved actions.

There are a number of good practice examples of sustainability reporting with some NHS bodies trialling approaches from a simple table of requirements and progress against the standard contract, to the mapping of carbon impact against individual lines in their ledger.

Examples of sustainability reporting are set out below for reference. While the information listed in these examples is neither exhaustive nor mandatory, it may be a useful guide for preparers of annual reports of the types and broad headings of information that readers will find useful.

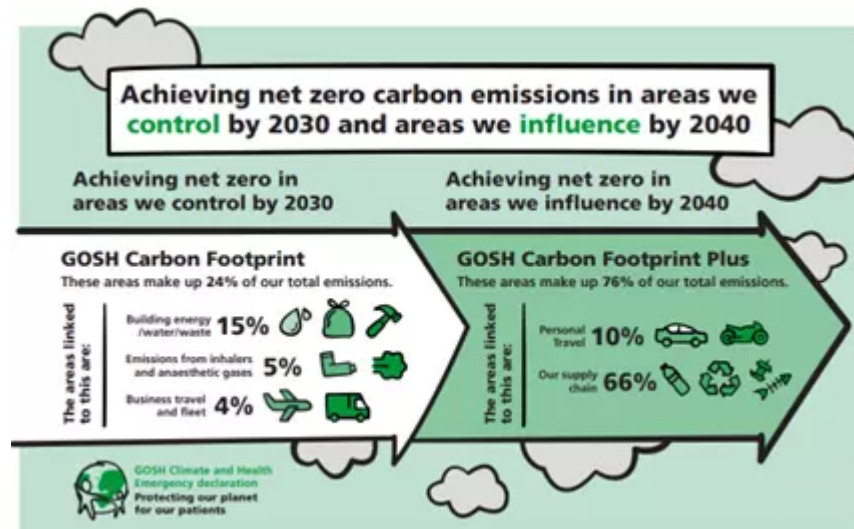
NHS England⁵⁶ and the Home Office⁵⁷ include a specific sustainability report/ appendix in their annual report and accounts.

Newcastle upon Tyne Hospitals NHS Foundation Trust was the first healthcare organisation in the world to declare a climate emergency. Their *2022/23 annual report*⁵⁸ clearly identifies environmental actions taken, areas where further work is needed, and what action can be taken. A user-friendly table with simple graphics demonstrates how the trust has performed against: energy; water; waste; buildings and land; purchasing; journeys; care and people, outlining discrete and replicable action taken. The annual report cross-refers to the separate *Sustainable healthcare in Newcastle (SHINE) – towards net zero report*⁵⁹, which provides more detail in an attractive format.

Manchester University NHS Foundation Trust, provides readers with information on its carbon footprint plus the emissions over which they have influence in its *2022/23 annual report*⁶⁰. It relates research into sustainable models of care led by clinicians, which has also improved patient care.

As shown in **figure 2**, Great Ormond Street Hospital NHS Foundation Trust, cited as best practice by the National Audit Office (NAO) in *Good practice in annual reporting*⁶¹, sets out how net zero carbon emission targets will be achieved⁶² by areas of control and influence, including how this will be delivered and achievements so far.

Figure 2: Great Ormond Street Hospital NHS Foundation Trust annual report 2022/23 extract

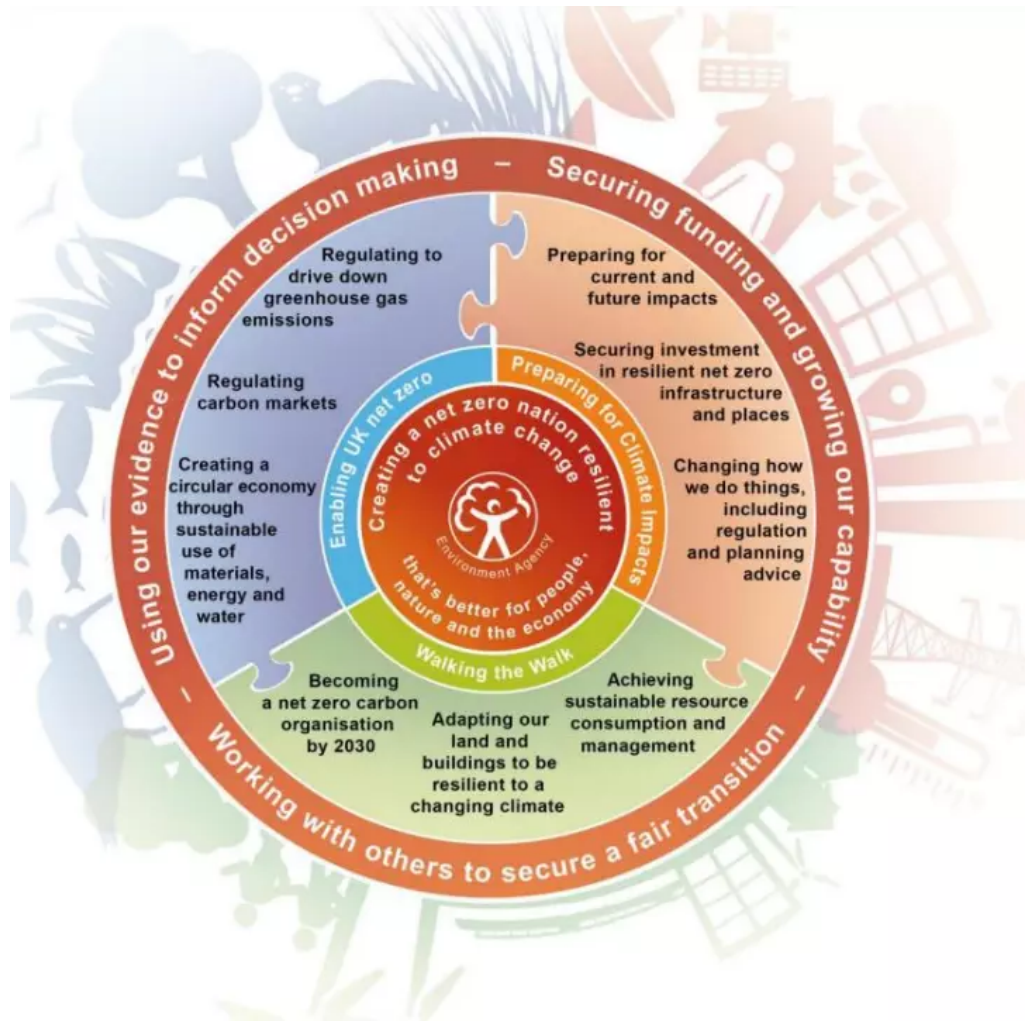


Welsh health boards publish high-level summary sustainability information in their annual reports with reference to more detailed reporting.

Velindre University NHS Trust’s [annual report](#)⁶³ includes detailed sustainability information in a section on the Future Generations Act: creating a sustainable organisation. This section of the report covers interactive active travel and sustainability maps, biodiversity enhancements, green social prescribing, decarbonisation, and waste. It also describes community engagement for staff, patients and the wider community through arts projects such as weaving with old uniforms, and two jamborees with activities linking the themes of sustainability, well-being and art. The trust passed the reaccreditation of ISO14001:25 in September 2022. The report also references the trust’s medium-term integrated plan 2022/25, linking it to the wider sustainability goals of the Future Generations Act.

HM Treasury has published a review of examples of [best practice in annual accounts](#)⁶⁴, including sustainability reporting, citing the Environment Agency’s graphic (**figure 3**) which demonstrates their climate ambition, and includes details on TCFD recommended disclosures, and setting out management’s strategy for climate-related risks as an example of best practice.

Figure 3: Environment Agency climate ambition in HM Treasury’s Best practice examples 2021/22



The NAO *Good practice in annual reporting* highlights annual reports from a range of organisations for their consideration of the environment in which the entity operates, stakeholder engagement and integration of sustainability into core strategy.

From the global corporate reporting sector, *Olam group’s annual report*⁶⁵ features a comprehensive response to TCFD requirements, which includes cross-referencing to additional information elsewhere in the report. The annual report sets out the organisation’s purpose, vision, and objectives across a number of capitals: financial, manufactured, intellectual, intangible, human, social and natural. It considers the pillars of governance, strategy, risk management, and metrics and targets. This annual report provides a more holistic picture of the organisation, including the risks and opportunities to all its stakeholders. This demonstrates how improved connectivity and dependency of integrated reporting can inform better decision-making.

The role of the finance function

The role of the finance function in driving effective sustainability reporting is critical. This role extends beyond meeting the requirements set out for inclusion in the annual report and accounts. With a number of question marks over metrics, evolving guidance and often pockets of reporting in silos, the finance function has the necessary skills to analyse and report measures, and to bring together different sources of information and people. Crucially, the finance function can identify, and provide early warning of, operational and risk drivers linked to sustainability efforts, and their potential impact on the overall financial position.

CIPFA notes⁶⁶ 'public sector sustainability reporting needs to significantly step up... there is a need for transparency that will facilitate further action'. CIPFA acknowledges the myriad of guidelines and requirements and makes the case for national and international consistency.

ACCA's *Green budgeting toolkit*⁶⁷ shows action to address the climate challenge requires change across the whole public sector, and must be central to every organisation's decision-making processes. It states 'accountancy and finance professionals in the public sector are essential to this task, providing leadership and expertise to mainstream climate action'.

The finance function also has a role in ensuring climate change risks are on the board agenda, considered as part of the overall strategy and proactively in decision-making. The Care Quality Commission (CQC) well-led *quality statements*⁶⁸ include: 'we understand any negative impact of our activities on the environment, and we strive to make a positive contribution in reducing it and support people to do the same'.

The impact of climate-related risks is also an area of increasing audit focus as a result of the Financial Reporting Council's (FRC) *review of TCFD disclosures*⁶⁹. The FRC's recommendations include recognising that climate change risks should be on the board agenda, integrated into decision making, and their impact on accounting and disclosures (including judgments and estimates) considered.

The NAO guide, *Climate change risk: a good practice guide for audit and risk assurance committees*⁷⁰, recognises the key role audit and risk assurance committees play in supporting and advising the board.

Audit committees in particular should be aware of the planning and reporting requirements and be able to offer sufficient challenge and assurance to help organisations implement their plans (including milestones and metrics) and hold the board and individuals to account.

There are a number of training programmes and guidance available, such as ICAEW and CIPFA's *Public sector sustainability certificate*⁷¹, ACCA's *Certificate in sustainability for finance*⁷², CIMA's *Fundamentals of ESG certificate*⁷³ and ICAEW's *Sustainability certificate*⁷⁴, to support finance professionals in gaining knowledge and skills to integrate sustainability reporting into their organisations. The HFMA's regular *Environmental sustainability round-up*⁷⁵ includes details of a number of these.

We will continue to update our briefing as requirements and standards develop. Please get in touch via policy@hfma.org.uk if you would like to share your own examples from 2023/24 or would like to get involved in supporting this agenda.

Footnotes

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The Healthcare Financial Management Association (HFMA) is the professional body for finance staff in healthcare. For over 70 years, it has provided independent and objective advice to its members and the wider healthcare community. It is a charitable organisation that promotes best practice and innovation in financial management and governance across the UK health economy through its local and national networks.

The association also analyses and responds to national policy and aims to exert influence in shaping the wider healthcare agenda. It has particular interest in promoting the highest professional standards in financial management and governance and is keen to work with other organisations to promote approaches that really are 'fit for purpose' and effective.

The HFMA offers a range of qualifications in healthcare business and finance at undergraduate and postgraduate level and can provide a route to an MBA in healthcare finance.

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