



## Module: Creating Social Value

### ***Implementation note***

This implementation note accompanies a module developed for the Sustainable Development Strategy for the NHS, Public Health and Social Care System 2014 – 2020.

It provides examples of practical approaches, actions, guidance and tools to help deliver the measures of success outlined in the module.

January 2015



**The four measures of success by 2020 are:**

**Organisations across the system have regularly assessed their local area and genuinely work to build stronger communities through effective partnerships. They continually review impacts of their contributions in order to improve the ways in which they protect and improve health and well-being.**

**Sustainable Development Management Plans include robust social interventions alongside environmental ones to improve health, reduce environmental impact and enhance social value.**

**Commissioners and providers routinely use a tested framework for designing and implementing initiatives which have a demonstrable and positive impact on social value.**

**Tools for measuring and evaluating social value are commonly used by organisations and in local systems of care.**

**A cross-sector steering group for social value effectively encourages wider adoption across health and social care for instance through guidance and case studies that highlight good practice. It regularly reports on social value across the health and care sector.**

## **Introduction**

Throughout the course of the consultation on Social Value in the health and care system we heard repeatedly about its role in reducing inequalities and improving outcomes which matter to local people. We heard too many examples of how by focusing on reducing inequalities across the commissioning cycle we can focus service provision and commissioning spending in ways which can improve social value.

The use of social value is clearly supportive of the agenda to improve commissioning and can be seen to have a role to play in the following areas:

- **Working collaboratively to commission services** - The use of social value can help to harness provider innovation and creativity; and has the potential to assist with understanding the whole-system value of the goods and services being delivered.
- **Prioritising investment according to local needs** - The use of social value has the potential to help to ensure that the full value of investment decisions is taken into account and with the right training commissioners can develop a greater understanding of place-based, population, preventative commissioning.
- **Stimulate the market to meet demand and secure the required outcomes** - Using social value principles could support providers to innovate and to demonstrate the wider benefits that they can bring.
- **Promote continuous improvements in quality and outcomes** - The use of social value could be used to provide a mechanism that supports providers to innovate, which could improve quality and outcomes. The Innovation Module contains further guidance.



- **Manage systems and work in partnership with providers** - Social value can potentially be co-ordinated across the local health & wellbeing system and across partners so that systems can work more effectively in partnership to deliver outcomes.
- **Make sound investments to ensure sustainable development and value for money** - Social value enables a thorough understanding of the full value of commissioning/decommissioning decisions, including partner investment, to ensure sound and sustainable investment decisions are made.



**Measure of Success 1:** Organisations across the system have regularly assessed their local area and genuinely work to build stronger communities through effective partnerships. They continually review impacts of their contributions in order to improve the ways in which they protect and improve health and well-being.

**Measure of Success 2:** Sustainable Development Management Plans include robust social interventions alongside environmental ones to improve health, reduce environmental impact and enhance social value.

- There are a range of benefits to local communities of considering social value – including improved service delivery, greater economic growth, wellbeing and quality of life, and an increase in the resilience of communities. Contracting authorities have also reported improved community relations, increased motivation and job satisfaction of staff, and improved image of the organisation.
- Social value also has clear connections with efforts to reduce health inequalities, and defining social value with reference to the social determinants of health can help to reduce local inequalities and improve health.
- There are currently reduced funds available to contracting authorities – for example, local authority budget cuts will total 40% on average by 2016. This increases the need for gaining the greatest value per pound spent locally, and social value can help to achieve this. Acting to increase social value also has the potential, in the longer term, to reduce the demand on health and other services by improving the health and wellbeing of the population, and can provide guidance on what to decommission or cut.
- The health sector is an important sector for social value. The move of much commissioning to Clinical Commissioning Groups (CCGs) creates an opportunity to ensure that local procurement decisions benefit local populations in addition to the direct benefit of the services being purchased.
- Fulfilling social value requirements can help the health sector meet other national legislative requirements –including statutory health inequalities duties and integration duties. Implementing social value approaches also relates to national health system priorities, including the increasing focus on prevention set out in the NHS 5 Year Forward View.

Examples of how this could be taken forward are:

- Health and Wellbeing Boards ensure that environmental and social sustainability are a core component of their Health and Wellbeing strategies and publish an annual progress report.
- Ensure that local communities are involved in the assessment of need in relation to sustainability and the design of service commissioning and resilience for health and wellbeing (JSNA).
- Integrate social value into the Joint Strategic Needs Assessment (JSNA).
- Evaluate current community assets and strengths to inform plans and support communities to develop a sense of place and identity that helps reinforce health and wellbeing.
- Or local economic strategies could incorporate social and environmental sustainability.
- Health and wellbeing boards consider the needs, risks, strengths and assets of communities served and ensure that services are tailored to support and manage health and wellbeing, particularly for those that are most in need or most vulnerable.



### **Case Study: Walsall CCG**

NHS Walsall CCG has adopted a public value approach to commissioning and procurement which seeks to deliver social, economic and environmental benefits to the local community as well as providing high quality clinical services and outcomes.

This approach was developed following an academic study which applied public value management theory.

The CCG has been keen to apply this in practice and accordingly it is now at the heart of the CCG's Strategic Plan and is being used to underpin all commissioning and procurement activity.

#### ***Key Elements of the Approach***

Key features of public value management that have been wedded into this approach include:

- There is an emphasis on meeting societal needs as well as providing good quality care to individuals with organisational values and a public service ethos being at the core of this approach.
- Public managers should act as “explorers” to seek out the creation of public value.
- Providers are encouraged to apply co-production with service users and clients in both the planning and delivery of services.

The points below provide some illustrative examples of specific areas where co-ordination and alignment of activity is useful:

- Develop and intensify cross agency discussions to build a locality level view of the assets, risks, opportunities and needs of communities so these can form part of local needs assessments and health and wellbeing strategies. Act across agencies to tackle the wider determinants of health and wellbeing and reduce inequalities.
- Better understand the role of Equality Impact Assessments in supporting commissioners and providers to assess the opportunities for embedding social value in activities which promote social value.
- Identify opportunities to understand and augment the social value and assets that are already in place. This includes maximising the benefits of a co-ordinated approach to the commissioning of goods and services in line with the requirements of the Public Sector (Social Value) Act 2012 – please refer to the Commissioning and Procurement Module for more details – [www.sduhealth.org.uk/commproc](http://www.sduhealth.org.uk/commproc).
- Identify opportunities where collaborative local sustainable development infrastructure projects could deliver multiple benefits for instance in relation to housing, shared infrastructure, district heating schemes or joined up travel and transport plans.
- Use the Good Corporate Citizen self-assessment to show where opportunities for improvement may be.



**For example: City and Hackney CCG**

This policy developed by City and Hackney CCG is designed to support partnership working in the integration of sustainability into the Joint Strategic Needs Assessment (JSNA), embed principles and metrics within contracts to measure social value, and ensure procurement processes include it at all stages.

The policy aims to:

- a) Sets the framework for the CCGs commissioning and procurement
- b) Communicate the strategy to suppliers and partners in all sectors;
- c) Use Joint Strategic Needs Assessment to establish a framework which will ensure investments support sustainable development and are used to best effect to
  - improve the wellbeing and opportunities of current and future citizens of City and Hackney;
  - make efficient use of all resources, protect and enhance the environment;
  - stimulate markets for desired services and/or products;
- d) Enable
  - balanced judgement of social, ethical, environmental and economic impacts throughout the procurement process;
  - contracts to support the monitoring and achievement of our goals.

**Salford City Partnership** have published a charter which covers their ambition to exploit social value across residents’ happiness, wellbeing, health, inclusion, empowerment, poverty and environment,

<b>Salford City Partnership</b>	<b>PROPOSED CHARTER : Social value in Salford</b>
<p><b>VISION:</b> In Salford, we will look for relevant <b>social, environmental and economic value</b> from everything that we do, including service delivery, commissioning and procurement; and aim to use the ‘Salford pound’ to obtain the greatest benefit for local citizens. Social value considers more than just the financial transaction and includes:</p> <p style="text-align: center;"><b>Happiness ✨ Wellbeing ✨ Health ✨ Inclusion ✨ Empowerment ✨ Poverty ✨ Environment</b></p>	
<p><b>We are committed to the following principles:</b></p> <ol style="list-style-type: none"> <li>1. optimising the social, environmental and economic well-being of Salford and its people in everything that we do</li> <li>2. thinking long-term – turning investment into long-lasting outcomes</li> <li>3. working together across sectors to provide social value outcomes</li> <li>4. having values including inclusion, openness, honesty, social responsibility and caring for others</li> <li>5. having a clear and current understanding of how social value can make Salford a better place to live</li> <li>6. Working together to measure, evaluate and understand social value, as well as reporting publicly to the people of Salford about the social value that</li> </ol>	<p>we create</p> <p><i>Commissioning will:</i></p> <ul style="list-style-type: none"> <li>• ask clear, appropriate questions and embed social value in policies, commissioning and procurement frameworks</li> <li>• give social value significant and proportionate weighting within procurement criteria and decisions</li> <li>• include social value in contract monitoring and management</li> <li>• engage with providers on an ongoing basis around social value</li> </ul> <p><i>Delivery will:</i></p> <ul style="list-style-type: none"> <li>• embed tools for monitoring and reporting social value as part of organisational processes</li> <li>• offer social value as part of tender submissions</li> </ul>
<p><b>We will know whether our principles are making a difference by evaluating such things as:</b></p> <ul style="list-style-type: none"> <li>• the flow of money in the local economy (LM3)</li> <li>• value of public contracts placed with local providers</li> <li>• the size of contracts and providers who deliver them</li> <li>• the level of understanding of the benefits of social value in commissioners and providers</li> </ul>	



## **Summary of Useful Tools and Guidance**

**Creating Resilient Communities: Using the Social Value Act in England to tackle health inequalities through action on the social determinants of health** – *This guidance developed by University College London, Institute to Health Equity highlights the role of social value in improving health and care inequalities.*

<http://www.sduhealth.org.uk/areas-of-focus/community-resilience.aspx>

**Joint Strategic Needs Assessment: A Guide to Integrating Sustainability** - *This guidance developed by Kent County Council is designed to support partnership working in the integration of sustainability into the JSNA and demonstrate the clear benefits of this approach. Working through will help to ensure that key aspects have been considered and cross referenced throughout the JSNA.*

[www.sduhealth.org.uk/resilience](http://www.sduhealth.org.uk/resilience)

**National Planning Policy Framework** - *The National Planning Policy Framework sets out the Government's planning policies for England and how these are expected to be applied. It states the purpose of the planning system is to contribute to the achievement of sustainable development.*

[www.gov.uk/government/publications/national-planning-policy-framework--2](http://www.gov.uk/government/publications/national-planning-policy-framework--2)

**Reuniting health with planning – healthier homes, healthier communities** – *Developed by the Town and Country Planning Association (TCPA) this guidance explores how planning and public health practitioners can work together to implement health and planning reforms in England.*

[www.tcpa.org.uk/pages/reuniting-health-with-planning-healthier-homes-healthier-communities.html](http://www.tcpa.org.uk/pages/reuniting-health-with-planning-healthier-homes-healthier-communities.html)

**Sustainable Development Management Plan (SDMP) Guidance** - *Guidance produced by the Sustainable Development Unit to support health and care organisations to develop board approved plans on sustainability.* [www.sduhealth.org.uk/plan](http://www.sduhealth.org.uk/plan)

**Good Corporate Citizenship Assessment Tool** – *Adaptation risk assessment is a section in the Good Corporate Citizenship model - a corporate social responsibility tool developed specifically for the health and care system.* [www.sduhealth.org.uk/gcc/](http://www.sduhealth.org.uk/gcc/)

**Guides describing the links between health and key environmental determinants** - *These guides, including Active travel & Transport, Air Quality and Green Spaces are written for Health and Wellbeing Boards, Directors of Public Health, elected members, Regeneration and Planning Officers, Environmental Officers, Health Watch and Clinical Commissioning Groups (CCGs). They are produced by the Greater London Authority (GLA).* [www.london.gov.uk/priorities/health/focus-issues/better-environment-better-health-guides-for-london-boroughs](http://www.london.gov.uk/priorities/health/focus-issues/better-environment-better-health-guides-for-london-boroughs)

**Obesity and the environment: increasing physical activity and active travel** – *A briefing note written by Public Health England written in conjunction with the Local Government Association. It addresses the issue of taking action to create environments where people are more likely to walk or cycle for short journeys.* [www.gov.uk/government/publications/obesity-and-the-environment-briefing-increasing-physical-activity-and-active-travel](http://www.gov.uk/government/publications/obesity-and-the-environment-briefing-increasing-physical-activity-and-active-travel)

**Supporting Healthy Inclusive Neighbourhood Environments Health Integration Team (SHINE HIT)** – *The Bristol Health Partners Supporting Healthy Inclusive Neighbourhood Environments Health Integration Team (SHINE HIT) aims to turn Bristol into a healthier city, with built environments that help people to be healthier. This will be achieved by integrating health, well-being and social inclusion with urban development and planning to reduce health risks and promote healthier*



*lifestyles.* [www.bristolhealthpartners.org.uk/health-integration-teams/supporting-healthy-inclusive-neighbourhood-environments-hit/](http://www.bristolhealthpartners.org.uk/health-integration-teams/supporting-healthy-inclusive-neighbourhood-environments-hit/)



**Measure of Success 3:** Commissioners and providers routinely use a tested framework for designing and implementing initiatives which have a demonstrable and positive impact on social value.

**Measure of Success 4:** Tools for measuring and evaluating social value are commonly used by organisations and in local systems of care.

Throughout the consultation for the Social Value we heard the same two themes repeatedly:

1. Social Value is inherently about outcomes, and outcomes are primarily about what matter to people. So, consulting and engaging with people is key to establish the outcomes which matter to them.
2. Social Value done well should have a measureable impact on reducing inequalities.

To ensure consistency with previous work on systemising the process of commissioning, it is recommended that the Commissioning Cycle is modified to ensure Social Value is included at each stage.

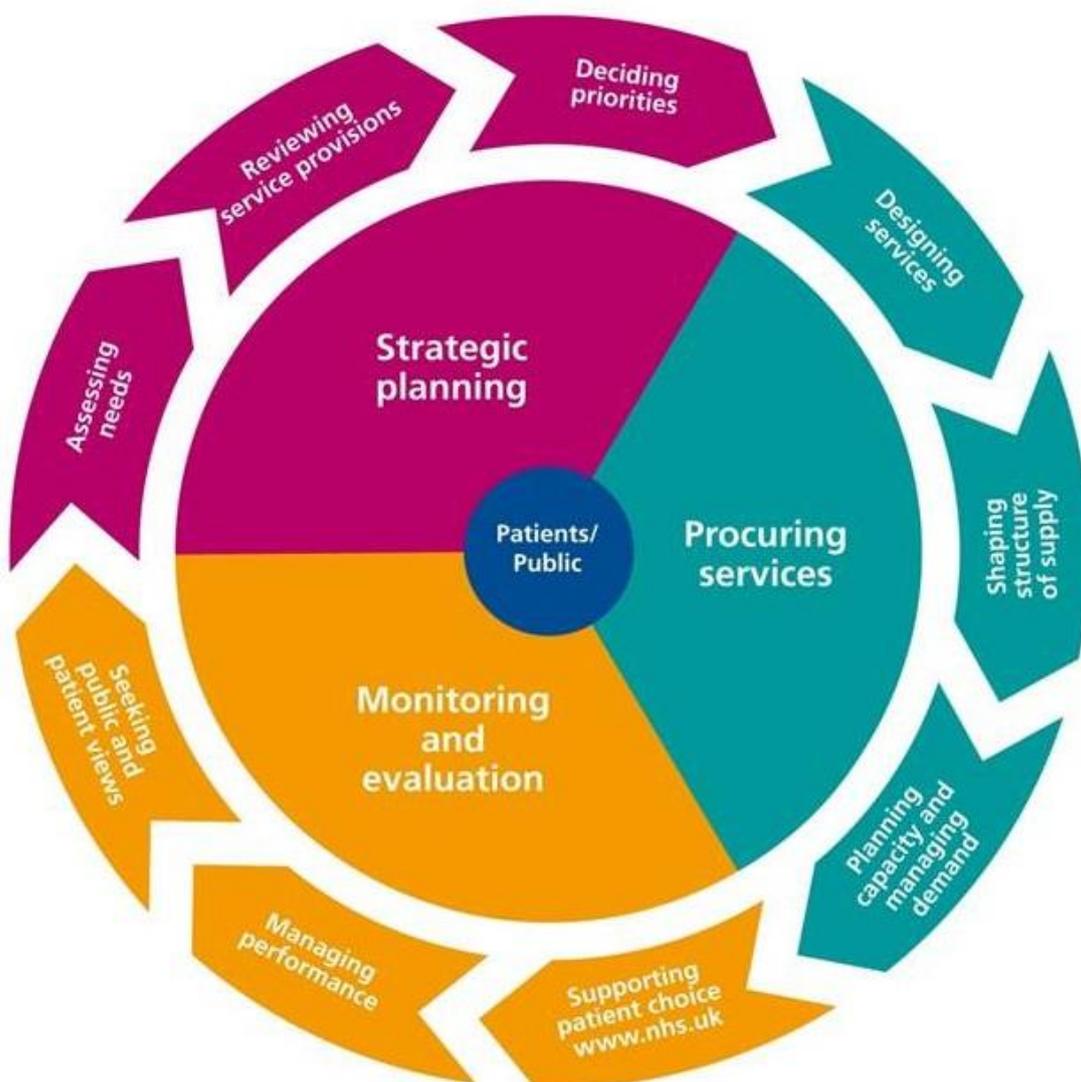


Figure 1. Commissioning Cycle. NHS Information Centre



The model consists of three central components:

- Strategic planning
- Procuring services
- Monitoring and evaluation

### **Strategic planning**

Planning has to be strategic and consider patients' needs and choices; services and interventions need to be reviewed to see if they are meeting specified patient outcome and crucially whether they are reducing inequalities and delivering outcomes that matter. This part of the cycle also allows commissioners to assess whether local assets are being used to best effect and whether community organisations have a productive role in reducing inequalities and improving access and outcomes.

### **Procuring Services**

At this stage services are designed based on evidence and set frameworks. To source services requires ensuring supply is in place and a market available to meet specified outcomes. This entails planning for capacity and managing demand accordingly across a spectrum of carefully designed services. This process can unintentionally exclude providers who could be best placed to deliver outcomes which really matter to local people. Excessive documentation, financial thresholds can often act as an impediment to smaller organisations and may disproportionately affect the types of outcomes delivered.

The Invitation to Tender stage of procurement provides an opportunity to include social value in the quality component of the tender and where possible clarity about metrics will be key to allowing objective and subjective assessments to be made. For NHS organisations, the NHS Standard Contract Service Condition Clause 18 provides a contractual placeholder for commissioners to agree a set of outcomes and KPIs which can form the basis of a contractual agreement on sustainability measures including social value.

#### **Case Study: Walsall CCG**

The CCG's Procurement Strategy is built around the Public Value Healthcare Procurement Framework and will ensure that procurement activity will be used as one of the key vehicles for delivering this approach. As part of tender exercises providers are now being expected to demonstrate how they will endorse and apply CCG and NHS values and are being asked to demonstrate that their own organisational values are compatible with these. This is helping to promote a public service ethos amongst providers irrespective of whether they are from the public, private or third sectors. When bidding for services tenderers are being asked to provide details of relevant policies and actions the organisation has taken in relation to economic, social and environmental issues and how, in providing the required service, they will deliver broader community benefits. Bidders are required to demonstrate compliance with the Equality Act 2010 including their recruitment practices. All of these elements form part of selection and award criteria when evaluating bids.



## Monitoring and Evaluation

Once services are procured they need to be managed and performance monitored to ensure that services are of a good quality, are meeting outcomes and are delivered at a reasonable cost. This should be informed by patient and public feedback as well as professional input. Understanding the role of Patient Reporting Experience Measures (PREMs) and Patient Reported Outcome Measures (PROMS) will assist commissioners and providers agree on the value being delivered locally. Additionally, identified social objectives such as improved employment, use of living wage and apprenticeship schemes should be included in all quality reports from commissioned services.

## Social Return on Investment

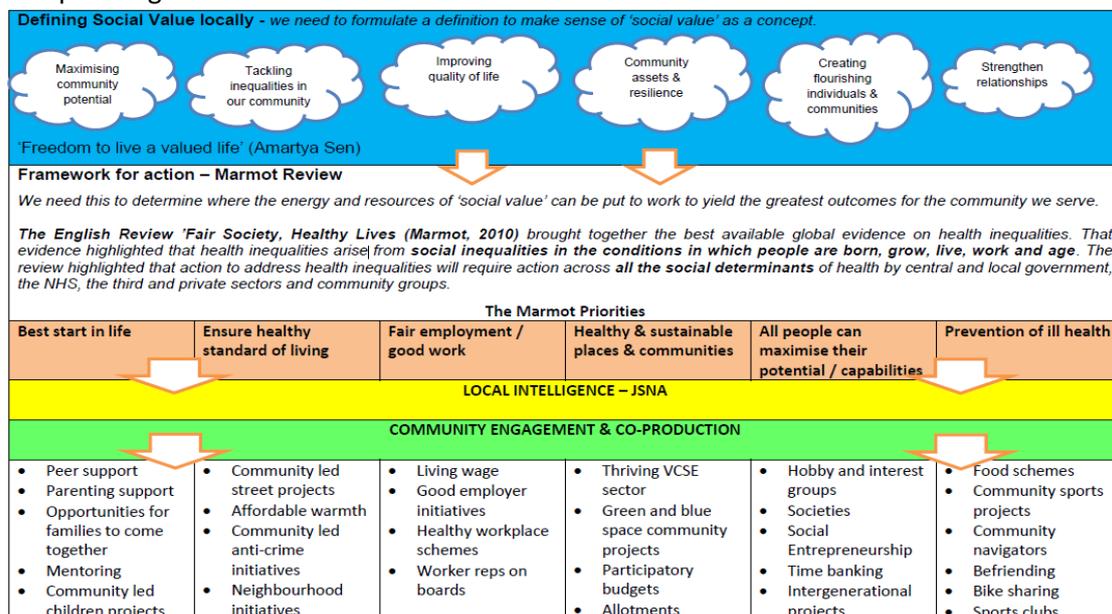
Social return on investment (SROI) is a principles-based method for measuring extra-financial value (i.e., environmental and **social** value not currently reflected in conventional financial accounts) relative to resources **invested**.

For Social Value assessment SROI is a framework for measuring and accounting for this much broader concept of value; it seeks to reduce inequality and environmental degradation and improve wellbeing by incorporating **social**, environmental and economic costs and benefits.

<http://www.thesroinetwork.org/>

Examples of approaches which work include:

- Use JSNA to confirm local inequalities and adopt an asset based approach to planning for improvements.
- Local Healthwatch and Voluntary Sector umbrella organisations are central to providing a picture of where services could be better aligned to meet health and care outcomes and ensure social value approaches are adopted across care pathways.
- Use an assets based approach to ensuring local communities and providers are able to compete on equal footing with larger providers for all contracts.
- Include measureable social value expectations into tender specifications and include a weighted framework for evaluation within the quality section of all ITTs.
- For NHS contracts, use Service Condition Clause 18 to build contractual commitments to SV and wider sustainability into contracts.
- Use public health/department of health research on health inequalities to shape policy and planning decisions. Halton Social Value tool below:





### Did you know?

#### **Social Value is wider than just financial.**

**Cost Benefit Analysis:** The Treasury Green Book explains how to conduct a social cost-benefit analysis as a way to appraise a project and includes some information on estimating costs/benefits that do not have a market value: <https://www.gov.uk/government/publications/the-green-book-appraisal-and-evaluation-in-central-government>

Unit cost databases provide lists of costs that can be used to calculate cost savings arising from a particular intervention:

- New Economy: [http://neweconomymanchester.com/stories/832-unit\\_cost\\_database](http://neweconomymanchester.com/stories/832-unit_cost_database)
- Personal Social Services Research Unit: <http://www.pssru.ac.uk/>

#### **Well-being/Satisfaction Measures**

Patient Reported Outcome Measures (PROM) and experience measures (PREM) are now being routinely used across health services. The Warwick and Edinburg Wellbeing Scale and a range of social adjustment scales can provide useful ways of assessing impact which is not related to financial proxies. However, there are increasing banks of financial proxies emerging and the Cabinet Office Social Act Review provides some useful links to these below.

#### **NHS greater Glasgow and Clyde procurement case study**

The New South Glasgow Hospital project, due to be completed in 2015, is the largest design and construction project in Scotland. The site of the new hospital is close to areas of high deprivation, and the contracting authority, NHS Greater Glasgow and Clyde, wanted the project to include social, economic and environmental benefits and support a programme of wider regeneration in the surrounding communities.

A Joseph Rowntree Foundation publication that includes this as a case study stated that “legal advice indicated that it was appropriate to include targeted recruitment and training requirements in the specification because of the established links between employment and health: increasing employability and employment falls within the scope of NHS powers.”

Results, as of July 2013, included<sup>1</sup>:

- 320 new jobs created since the start of the new project, including 213 new entrants
- 58 apprenticeships and 154 young people undertaking work experience placements
- Approx. 2000 life-long learning opportunities for employees
- Sustained programme of engagement with schools, colleges, universities, local residents, community groups and local charities
- A 96% landfill diversion rate and low energy design.
- 65% of available work packages have gone to local SMEs.

<sup>1</sup> <http://www.scotland.gov.uk/Topics/Government/Procurement/casestudies/NHSGlasClydeBrookfield>



## Summary of Useful Tools and Guidance

### **Inspiring Impact**

Inspiring Impact is a ten-year programme, the first two years of which were funded by the Cabinet Office. It seeks to develop impact measurement and is led by the voluntary sector. Inspiring Impact hosts an online website full of free impact measurement tools and resources. These can be found at <http://www.inspiringimpact.org/listings> and are a valuable set of resources for anyone seeking to measure their social value.

Inspiring Impact has also developed a Code of Good Impact Practice, which outlines the four main stages that should take place in good impact measurement, and eight principles for good practice: <http://inspiringimpact.org/wp-content/uploads/2013/04/Code-of-Good-Impact-Practice.pdf>

### **Social Value Portal**

The Social Value Portal (<http://socialvalueportal.com/>) is a new resource that can be used by those wishing to measure their social value. The Centre for Citizenship, Enterprise and Governance (CEEG) has developed the social earnings ratio as a quick, low cost, high volume way to assess social impact. It is calculated by dividing the social value by the money spent on it. This can be calculated using very simple information (e.g. the CSR budget, the carbon reduction, and the number of people helped), and is meant to provide a single metric that can be used as a quick benchmark: <http://socialvalueportal.org/dataentry.php>      <http://www.ceeg.org.uk/#!research/cmp>

The Social Value Portal also provides a number of free spreadsheet tools - these take the form of templates which users can fill in to identify their financial and non-financial benefits.

**Measure of Success 5:** A cross-sector steering group for social value effectively encourages wider adoption across health and social care for instance through guidance and case-studies that highlight good practice. It regularly reports on social value across the health and care sector.

*It is recommended that partners across health & social care organisations and systems come together under a system steering group who will support the dissemination of wider best practice and approaches to improve local Social Value.*

The Public Services (Social Value) Act 2012 has come at an important and challenging time for a public sector which is simultaneously committed to reducing costs and creating transformational change in the way in which it delivers the shared social, health, economic and environmental aspirations of the communities it serves.

To do this effectively, public sector bodies will increasingly need to consider how additional benefits can be levered from all public sector investment in 'places'- particularly in ways that increase social justice, embed social protection and strengthen community cohesion.

This will require more sophisticated technical assessments of investment and changes to how services are delivered for the benefit of local people, but also an analysis of the socio-cultural



determinants of the change needed – within professional cultures, within service delivery systems *and* within communities themselves.

There are a number of increasingly powerful drivers shaping the planning and delivery of public sector outcomes at this time and the understanding of these will need to take a more central role in defining the way in which health system resources are mobilised in future.

These include the need to:

1. reduce inequalities by developing healthy, economically active and socially supportive environments or ‘places’ which ‘release’ communities own assets and resilience, building on the recommendations of the Marmot Review of the Social Determinants of Health in England.
2. develop whole system delivery platforms for integrated public service delivery which will both reduce costs and increase efficiency.
3. develop services that both seek to co-produce outcomes with consumers as equal partners and that liberate the caring and advocacy capacity of each public sector professional to drive change for improvement
4. target and personalise services more effectively which is informed by local assets and local voice and priorities
5. increase the ‘social value’ of public sector investment in each ‘place’ through more effective and socially-just use of the 40 -50% of GDP which is public sector spend.
6. move from a ‘detect and manage’ model of needs assessment and service delivery to a more integrated and intelligence based ‘predict and prevent’ approach - capable of modelling the investment required across whole public sector systems to prevent the need for social welfare system dependency and realise the shared improvement benefits for all.

### **Overall purpose**

The steering group will be established to fulfil the following remit:

- a) Act as a Steering / reference board to support the development of Social Value approaches and methodologies across Health and Social Care
- b) Support the development of effective preventative strategies through social and community-based interventions addressing the broad, social determinants of health and well being
- c) Support the implementation of the Sustainable Development Unit’s Social Value strategy which includes the development of measurement methodologies for Social Value

It is anticipated the steering group will help deliver the following outcomes:

- Develop a summary of current national and international research and best practice in support of social value, with a potential to look at other service sectors in addition to health & care
- Develop usable definitions applicable to health & social care
- Develop supporting documentation to facilitate the implementation of the Social Value module
- Develop a methodology and toolkit, linked to commissioning & performance frameworks that is sustainable where it can be used again and again



- Develop a self-evaluation framework and guidance for improving awareness of and the use of this concept
- Develop a basket of recommended indicators plus guidance on their use and measurement
- Mapping out current practice and possible opportunities/barriers to adoption of process and principles, as well as recommendations to realise the benefits/ surmount the challenges
- Drawing up a series of case studies showcasing best practice and experiences of practical implementation
- Extrapolating the potential impacts to health and well being

The products of the group will be shared across the public sector and will be chaired by Sir Michael Marmot from the UCL Institute of Health Equity.

More information available from: <http://www.sduhealth.org.uk/areas-of-focus/social-value.aspx>



**Please note that this implementation note is intended to be a supporting document to the Sustainable Development Strategy for the NHS, Public Health and Social Care System for those interested in taking forward action in specific areas. They are not intended to be must-dos and they will evolve over the lifetime of the strategy.**

**We are particularly keen to be made aware of public health and social care actions in these areas so please do get in touch if you feel key information, tools and guidance are missing from the implementation note.**

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