

Our Reference North East and North Cumbria ICB\
FOI ICB 26-088

North East and North Cumbria ICB
Pemberton House
Colima Avenue
Sunderland Enterprise Park
Sunderland
SR5 3XB

Tel: 0191 512 8484
E-mail: nencicb.foi@nhs.net

By Email

11 June 2026

Dear Applicant

Freedom of Information Act 2000 – Request for Information – NHS North East and North Cumbria Integrated Care Board (NENC ICB)

Thank you for your request received on 26 May 2026 for information held by NHS North East and North Cumbria Integrated Care Board (the ICB) under the provisions of the Freedom of Information Act 2000. The ICB covers the areas of County Durham, Newcastle Gateshead, North Cumbria, North Tyneside, Northumberland, South Tyneside, Sunderland, and Tees Valley.

Please find the information you requested on behalf of the ICB as follows.

Your Request

I wish to enquire under the Freedom of Information Act about the NHS Net Zero Supplier Roadmap, and how the requirements set out in that are enforced in practice by NHS North East and North Cumbria Integrated Care Board, with specific reference to the care sector.

I have read the guidance published at the link below. My questions are not about the guidance, they are seeking clarity about how you are applying the guidance in practice.

<https://www.england.nhs.uk/long-read/carbon-reduction-plan-requirements-for-the-procurement-of-nhs-goods-services-and-works/#nhs-supplier-crp-and-net-zero-commitment-requirements>

Context

The Roadmap states that:

- *From April 2023:* For all new contracts above £5 million per annum, the NHS requires suppliers to publish a Carbon Reduction Plan for their UK Scope 1 and 2 emissions and a subset of scope 3 emissions as a minimum (aligning with PPN 06/21). The Carbon reduction plan and net zero commitment requirements for the procurement of NHS goods, services and works guidance outlines what is required from suppliers and how it should be implemented.

- *From April 2024:* The NHS has proportionately extended the Carbon Reduction Plan requirements to cover all new procurements. This is based on a tiered approach, as follows:
 - a full Carbon Reduction Plan (CRP), as defined in the section “CRP Requirements”, is required for procurements of high value (£5m per annum including VAT and above) and new frameworks operated by in-scope organisations, irrespective of the value of the contract, where relevant and proportionate to the framework.
 - a Net Zero Commitment, as defined in the section “Net Zero Commitment – Requirements”, is required for procurements of lower value (below £5m per annum including VAT and above the relevant published procurement threshold).

Questions

Please could you answer the following questions 1 to 8, with specific reference to care providers.

My questions are not about the NHS guidance, which I have seen, but are specifically around how you are applying the guidance in practice for care sector suppliers.

1. If one is required (e.g. given the contract value or for new frameworks), are you formally and routinely requesting submission from suppliers of a Carbon Reduction Plan (CRP)?
2. Who within the ICB (i.e. which department or team) is then accountable for ensuring that an acceptable CRP has been submitted?
3. Is there any subsequent monitoring of progress against commitments in the supplier’s CRP (e.g. annual reviews)?
4. If a CRP is not required, are you formally and routinely requesting from suppliers sight of a Net Zero Commitment (NZC)?
5. Who within the ICB (i.e. which department or team) is then accountable for ensuring that the NZC is acceptable?
6. Is there any subsequent monitoring of progress against the supplier’s NZC (e.g. annual reviews)?

Please can all the above questions be answered separately (if appropriate) for both:

- a. private sector suppliers, and
- b. charity (or not-for-profit) sector suppliers.

The NHS guidance also references “Exceptional circumstances”, as follows:

It may not be relevant or proportionate to apply these CRP and NZC requirements in the following exceptional circumstances (which may often be temporary):

- *Where the market for a contract of this type is distorted/narrowed/struggling to such a significant extent that delivery of public services (for example patient care) is likely put at risk, or value for money is likely to be severely compromised.*
 - *Where a light touch contract, framework or dynamic market is set up in accordance with PA23 to support SMEs or VCSEs to access public contracts, and the request to implement a CRP could be a barrier to entry. Market engagement is required to understand whether requesting a CRP is a barrier and this should be evidenced with market intelligence for this exceptional circumstance to apply.*
 - *Where there is a civil emergency.*
7. Do you routinely apply any of these exceptions in the case of suppliers from the charity sector?

I have also seen the guidance set out by PPN 10/21 from December 2021, published at the link below.

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/1041964/Procurement_Policy_Note_10_21_-_New_Thresholds_Values_and_Inclusion_of_VAT_in_Contract_Estimates.pdf

8. Is the ICB still applying the thresholds as set out in Annex A of this guidance, or have those been increased since 2022?

Our Response

We can confirm, as per Section 1(1) of the Freedom of Information Act 2000, the ICB does hold the information requested.

1. Yes, requesting submission of a CRP is part of our Procurement Specific Questionnaire (PSQ) for competitive procedures.
2. CRP are reviewed as part of the compliance checks of the submitted PSQ and undertaken by a procurement lead as well as the procurement working group for that specific project.
3. Any monitoring undertaken would be done at a contract management level within the area responsible for this service.
4. Yes, this is part of our PSQ for competitive procedures.
5. CRP are reviewed as part of the compliance checks of the submitted PSQ and undertaken by a procurement lead as well as the procurement working group for that specific project.
6. Any monitoring being undertaken would be done at a contract management level within the area responsible for this service. There is no difference in the process for private sector suppliers or charity (or not-for-profit) sector suppliers.
7. No, this will only be considered as and when appropriate within the circumstances outlined in the guidance.
8. Updated thresholds were published on 1 January 2026 and the ICB are adhering to these thresholds.

In accordance with the Information Commissioner's directive on the disclosure of information under the Freedom of Information Act 2000 your request will form part of our disclosure log. Therefore, a version of our response which will protect your anonymity will be posted on the NHS ICB website <https://northeastnorthcumbria.nhs.uk/>.

If you have any queries or wish to discuss the information supplied, please do not hesitate to contact me on the above telephone number or at the above address.

If you are unhappy with the service you have received in relation to your request and wish to request a review of our decision, you should write to the Information Governance Manager using the contact details at the top of this letter quoting the appropriate reference number.

If you are not content with the outcome your review, you do have the right of complaint to the Information Commissioner as established by section 50 of the Freedom of Information Act 2000. Generally, the Information Commissioner cannot make a decision unless you have exhausted the ICB's complaints procedure.

The Information Commissioner can be contacted at Information Commissioner's Office, Wycliffe House, Water Lane, Wilmslow, Cheshire, SK9 5AF or www.ico.org.uk.

Any information we provide following your request under the Freedom of Information Act will not confer an automatic right for you to re-use that information, for example to publish it. If you wish to

re-use the information that we provide and you do not specify this in your initial application for information then you must make a further request for its re-use as per the Re-Use of Public Sector Information Regulations 2015 www.legislation.gov.uk. This will not affect your initial information request.

Yours faithfully

Information Governance Support Officer

**Information Governance Support Officer
North East and North Cumbria Integrated Care Board**