

ENVIRONMENTAL AND SUSTAINABILITY POLICY

Policy Domain	Healthshare Group
Policy ID	HS 24
Version Number	7a
QSI Domain	N/A
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Job Title	IG Lead
First Release Date	14 October 2008
Ratification Date	21 July 2023
Ratified By	Net Zero Steering Group
Review Frequency	Triennially
Last Review Date	July 2023
Next Review Date	July 2026

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REVISION SUMMARY

Version	Comments	Author	Date
1	First Release	J A Nicholls	14 Oct 2008
2	Reformatted into new template	J A Nicholls	1 May 2009
3	Updated	J A Nicholls	21 Oct 2011
4	Updated	J A Nicholls	Oct 2013
5	Reviewed	J A Nicholls	Oct 2015
6	Updated following Net Zero Commitments	A Watson	1 November 2021
7	Update for Cabinet Office scope reporting, Carbon Baseline and Financial Reporting requirements	IG Lead	02 March 2023
7a	Added items to meet ISO 14001	IG Lead	21/07/2023

1 INTRODUCTION

An Environmental Management System (EMS) is a tool for managing the impacts of Healthshare's activities on the environment. It provides a structured approach to planning and implementing environmental improvement and protection measures. It considers what Healthshare is required to do because of legislation or other regulations as well as the things we at Healthshare choose to do. Top management have overall accountability for the EMS and provide strategic direction. It is based on the process of Plan, Do, Check, Act.

2 POLICY STATEMENT

The aim of this Policy is to state and communicate Healthshare Limited intentions, organisation of and arrangements for Environmental Management and Sustainability.

Healthshare recognises that the business activities which it undertakes have a significant impact on the environment and Healthshare is committed to incrementally/continually improve its overall Environmental performance and its approach to Sustainability.

Healthshare is committed to preventing pollution and reducing the environmental impact of its activities, and where reasonably practicable will comply with all relevant environmental legislation.

We accept our responsibility to minimise, wherever possible, our impact on the environment and to comply with statutory environmental legislation and additional environmental requirements that Healthshare has subscribed to.

Healthshare will contribute towards the protection of the local, national and global environments through the development and implementation of a robust Sustainable Development Management Plan.

ISO 14001:2015 places emphasis on the needs and expectations of interested parties and how these should be considered in the shape and development of the EMS. The needs and expectations of Healthshare's interested parties have been mapped in our Scoping document.

3 OBJECTIVES

We aim to continually promote and develop a pro-active approach to Environmental Management and Sustainability by:

- Maintain a Sustainable Development Management Plan (SDMP)
- Developing a programme to ensure compliance with the NHS Carbon Reduction Strategy to reduce carbon emissions by 2040
- Implementing an action plan which targets activities that will improve sustainability
- Demonstrate our commitment to sustainable development by adopting and implementing the NHS Sustainable Development Assessment Tool (SDAT)
- To embed sustainable development into management and governance processes this will assist with the delivery high quality healthcare.
- Champion sustainability at the highest level and cascade right throughout Healthshare.
- Develop a Steering Group of site staff charged with implementing the Environmental Management Policy.
- Engaging with our Service Providers and suppliers to develop and deliver a robust efficiency strategy in line with Healthshare commitment



- Deliver Healthshare’s capital program of building and refurbishments in compliance with relative legislation in respect of environmental sustainability
- Healthshare is committed to continuous improvement in minimising the impact of its activities on the environment.

4 WHO THIS POLICY APPLIES TO

This policy applies to all persons working for Healthshare or on our behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners, sponsors, or any other person associated with us, wherever located. It includes all activities, products and services provided within Healthshare.

5 ROLES & RESPONSIBILITIES

- 5.1 The Net Zero Lead (Healthshare’s CEO) is responsible to the Healthshare Group Board for this policy and the environmental performance of the organisation and progress towards the net zero commitments. Annually an update report (*last reported November 2022*) is presented at the financial year-end to the Group Board for consideration and any actions that Board feels are necessary to direct in a rolling Action Plan.
- 5.2 The Net Zero Steering Group will ensure that sustainability becomes integrated into all Healthshare’s business activities and support and promote the policy throughout the organisation.
- 5.3 Healthshare’s Information Governance Lead is responsible for implementation and delivery of Healthshare’s Policy and Strategy and in particular the measurement, reporting and reduction of carbon and associated action plans.
- 5.4 All Managers and Team Leaders should make staff aware of the policy and their contribution to sustainable issues.
- 5.5 All staff have a responsibility to protect the environment and be sustainable in their actions at work.

6 HEALTHSHARE CLIMATE COMMITMENTS

In October 2020 the NHS made a commitment to achieve net zero by 2040 with an 80% reduction by 2028 to 2032 and in the NHS supply chain by 2045 with an 80% reduction by 2036 to 2039. The adoption of the NHS England Roadmap in October 2021 set out the near-term actions required of NHS Suppliers.

In Autumn 2021 Healthshare committed to achieve net zero by 2040 and net zero for our supply chain by 2045. In October 2021 Healthshare engaged with the NHS England & NHS Improvement Roadmap to support achievement of net zero through the supply chain.

7 EDUCATING OURSELVES

In late early 2021 Healthshare joined, and now actively participates in, the Independent Healthcare Providers Network Climate Change Working Group. This group provides a wealth of ideas and



encouragement between the members and receives expert input from Deloitte's sustainability advisory unit.

In November 2021 our Net Zero Lead attended COP26 in Glasgow to develop the organisation's awareness of tools and communication approaches.

8 DETERMINING IMPACTS AND BASELINE FOOTPRINT

To chart progress to net-zero commitments baselining Healthshare's footprint as a starting point is a policy commitment. The baseline requirement outcome and Action Plan is expected in early 2022 and will be repeated at least annually including statutory scope emissions reporting.

9 ENCOURAGING STAFF

Through Healthshare-wide and site & service specific communication mechanism a Communications Plan to encourage staff and raise awareness in all things environmental care is delivered.

10 ENCOURAGING OUR SUPPLY CHAIN

In 2023 Healthshare will baseline the carbon footprint of the supply chain to the organisation. In a similar way to the baselining of internal carbon footprints the 'imported footprint' will be examined. Since 2020 Healthshare has preferred 'green' providers in procurement.

To meet our net zero supply chain by 2045 Healthshare will work to reduce the imported carbon used in delivering our services.

11 REPORTING AND REGULATION

Healthshare is required to reporting emissions and plans to reduce through a number of media. They include:

- Cabinet Office (including Healthshare's Carbon Reduction Plan)
- Financial Statements (including carbon baseline and scope emissions)
- Wider investor and stakeholder interest in 'ESG' matters.

12 ENVIRONMENTAL MANAGEMENT

A range of long-established environmental management laws pertain to Healthshare. In most instances Healthshare works in collaboration with public and private sector landlords as the organisation owns only one freehold site.

In late 2022 the Group Board of Healthshare committed to implement and seek accreditation to ISO14001 the environmental management system Standard. It is anticipated this will take around 12 months.

13 ENVIRONMENTAL REQUIREMENTS

13.1 General Requirements

The overall environmental management system structure will be based upon the requirements, indicators and bench-marks set in the NHS Environmental Assessment Tool (NEAT). Actions to ensure full compliance with this standard are set in Healthshare Environmental Objectives and Targets Programme where it relates to sites.

The environmental management system will ensure that the requirements of all relevant environmental legislation are met, and incorporate other guidance and requirements: for example, the NHS Environmental Assessment Tool (NEAT).

13.1.1 Reporting

In almost all circumstances statutory reporting requirements are the prime responsibility of the landlord. Where Healthshare is the freeholder or the landlord is not immediately available, Healthshare's Chief Executive Officer will make the required reports.

13.1.2 Emissions to Air

Activities carried out by Healthshare will result in emissions to air, some of which may present an Environmental Risk. Activities include:

- Burning of fossil fuels in boilers and generators
- Chemicals, reagents and biological hazards used in diagnostic areas
- Releases of refrigerants with ozone depleting potential and / or global warming potential.
- Use of radioactive isotopes in medical diagnosis.
- Activities that cause excessive noise, dust or odour.

Wherever feasible or required by legislation, emissions to air from these processes will be mitigated through the installation of abatement equipment and effective maintenance. Where appropriate, emissions will be monitored.

13.1.3 Discharges to watercourses

Where working in secondary sites where water usage is served by two drainage systems: storm water drainage and foul water drainage (sewers).

Wherever possible, all staff within Healthshare are expected to minimise their contamination of water: only uncontaminated water should be discharged to the storm water drains on the site. Healthshare will liaise with the relevant water authority to determine substances that can and cannot be discharged to sewer. Guidance will be issued to all applicable areas and all staff are required to comply with the guidance in conjunction with landlords.

13.1.4 Discharges to Land

Healthshare operates no processes that directly result in discharges to land on Healthshare sites. However, incidents may occur that result in accidental discharges to land. These include spillage or leakage of a hazardous substance.

Healthshare operates maintenance programmes to reduce the risk of such incidents occurring, and has also implemented plans in order to minimise the environmental impact of such an incident.

13.1.5 Waste Management

Under environmental legislation, Healthshare has a duty of care on all the waste that it generates (clinical and non-clinical). Effective systems must therefore be in place to ensure that waste is effectively managed. Healthshare has committed to preparing a waste management SOP by site which sets out all elements of waste disposal within at each site.

13.1.6 Utilities Management

Healthshare uses utilities (electricity, gas, oil and water) extensively. As well as financial implications, their use has an impact on the environment. Where possible all new contracts and contracts for renewal are consider for renewable resource provision.

13.1.7 Transport Management

Through the use of vehicles by company staff, as well as patients and visitors to Healthshare sites, Healthshare has an impact on the environment.

Healthshare has identified that measures to alleviate parking problems on its existing and proposed new sites is required through the utilization of staff and patient awareness on public transport links and transport times to its sites of operation.

Train travel is encouraged wherever possible and electric vehicles are encouraged and advocated by a number of senior staff. Wherever possible staff are encouraged to travel together and consider the impact of their journeys and alternatives.

14 EQUALITY IMPACT STATEMENT

During the development of this policy the Company has considered the needs of each protected characteristic as outlined in the Equality Act (2010) with the aim of minimising and if possible remove any disproportionate impact on employees for each of the protected characteristics, age, disability, gender, gender reassignment, pregnancy and maternity, race, religion or belief, sexual orientation.

If staff become aware of any clinical exclusions that impact on the delivery of care an incident form would need to be completed and an appropriate action plan put in place

14.1 Equality Impact Assessment

The Company aims to design and implement services, policies and measures that meet the diverse needs of our service, population and workforce, ensuring that none are placed at a disadvantage over others. The Equality Impact Assessment tool assesses the impact of this policy.

		Yes/No	Comments
1.	Does the document/project affect any group less or more favourably than another on the basis of:		
	• Disability	No	
	• Sex	No	

	• Race	No	
	• Age	No	
	• Gender Reassignment (including transgender)	No	
	• Sexual orientation	No	
	• Pregnancy & Maternity	No	
	• Other identified groups	No	
2.	Is there any evidence that some groups are affected differently?	No	
3.	If you have identified potential discrimination, are there exceptions valid, legal and/or justifiable?	NA	
4.	Is the impact of the document/project likely to be negative?	NA	
5.	If so, can the impact be avoided?	NA	
6.	What alternative is there to achieving the document/project without impact?	NA	
7.	Can we reduce the impact by taking different action?	NA	

Completed by:

Name Les De-Lara	Position Information Governance Lead	Date Completed: 16/01/2023
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15 REFERENCES

REFERENCES	<p>Clean Air Act 1993 Environment Act 2021 Environmental Protection Act 1990 Noise and Statutory Nuisances Act 1993 Radioactive Substances Act 1993 Water Industry Act 1999 Water Resources Act 1991</p> <p><i>Statutory Instruments</i> Contaminated Land Regulations 2012 Controlled Waste Regulations 2012 Controlled Waste (Registration of Carriers and Seizure of Vehicles) Regulations 1998 The Environmental Protection (Controls on Ozone-Depleting Substances) Regulations 2008 Environmental Protection (Duty of Care) Regulations 1991 Environmental Protection (Polychlorinated Bi-Phenyls and Other Dangerous Substances) Regulations 2020 Groundwater Regulations 1998 Landfill (England and Wales) Regulations 2005 Special Waste Regulations 2001 The Sulphur Content of Liquid Fuels (England and Wales) Regulations 2014</p>
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	Waste Management Licensing Regulations 2002
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