



Environmental Sustainability Policy

Author: Energy and Sustainability Manager

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Document Author = Alexis Percival, Energy and Sustainability Manager

Associated Documentation:

- Waste Management Policy
- Lease Car Policy
- Health and Safety Policy
- Fire Safety Policy
- Procurement Policy
- COSHH Policy
- Electric Vehicle Charging Policy
- Biodiversity Plan
- Green Plan
- Climate Adaptation Plan
- Flood Risk Assessment

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Staff Summary

Compliance with all relevant legislation and NHS guidelines
Adopting best practice where possible and striving to continually improve YAS's environmental performance.
Educating, training and motivating employees to understand and undertake their role in preventing, controlling and reducing YAS's environmental impact.
Embracing carbon reduction techniques in reducing YAS's carbon emissions and working towards Net Zero.
Ensuring compliance with waste management legislation and recommended best practice in minimising, segregating and recycling waste. YAS aims to achieve zero landfill and further reduce other waste streams across the organisation.
Undertaking an environmental impact assessment of new developments and adopt a life cycle approach by seeking to balance capital costs and long term running costs.
For new processes and procurement processes, considering environmental and safety implications before implementation.
Ensuring that where possible suppliers of goods and services to YAS and contractors demonstrate an acceptable standard of environmental performance.
Considering environmental costs in resourcing, purchasing, disposal, transport and distribution decisions.
Monitoring progress and producing a Green Plan as required by the national Greener NHS agenda.

1.0 Introduction

- 1.1 There is awareness of the world wide effects of day to day human activities on the environment. The Government has brought this to the attention of private sector industry and commerce and public service. It expects public authorities to respond positively to environmental issues to improve quality of life.
- 1.2 Yorkshire Ambulance Service NHS Trust (YAS) is committed to providing quality healthcare. In providing this service, YAS consumes resources and produces waste material which will in turn have an effect on the environment and ultimately may impact on the health of the people for whom YAS provides a service.
- 1.3 The Trust Board acknowledges that the Trust has a corporate and social responsibility to consider the environmental implications of the Trust's strategy and to promote policies and practices that will provide a responsible approach to environmental management within YAS. For this purpose, YAS has adopted this policy.

2.0 Purpose/Scope

- 2.1 As part of YAS's commitment to the environment, this policy has been prepared to enable YAS to set targets by which continuous environmental improvement can be measured.
- 2.2 To help fulfil this commitment, The Environmental Sustainability Oversight Group (ESOG) is a management group of the Yorkshire Ambulance Service NHS Trust ('the Trust'). The Group is chaired by the Trusts Executive lead and reports on environmental sustainability and related issues to the Trust Executive Group and to assurance committees of the Trust Board as required.

3.0 Process

3.1 General approach

3.1.1 The environmental related legislation and other guidelines that apply to YAS are contained within Appendix A. These requirements will be addressed by YAS's commitment to environmental principles as outlined in 1.0 above. Adherence to these principles will provide the framework for this Environmental and Sustainability Policy in support of environmental management requirements.

3.1.2 The following environmental aspects are considered to impact on YAS:

- Materials, handling and storage
- Site activities
- Energy usage and efficiency
- Emissions to air
- Procurement and supply chain
- Water usage and effluent discharges
- Waste generation, segregation and disposal
- Health and Safety
- Purchasing and supplies
- Packaging
- Transport
- Carbon reduction strategies at a regional and national level
- Global Pandemics
- Climate Change
- Climate Adaptation

3.1.3 Environmental Standards

3.1.3.1 YAS's Green Plan has been in place for several years to support the carbon reduction programme to work towards the Net Zero targets laid out by the Greener NHS.

3.1.4 Green Plan

3.1.4.1 The three-year Green Plan (formerly the Sustainable Development Management Plan (SDMP) and Carbon Management Plan) defines YAS's environmental priorities. Objectives and priorities are agreed with each environmental lead and progress monitored through the Environmental Sustainability Group (ESDG) and reported to the Environmental Sustainability Oversight Group (ESOG).

3.1.5 Register of Regulations

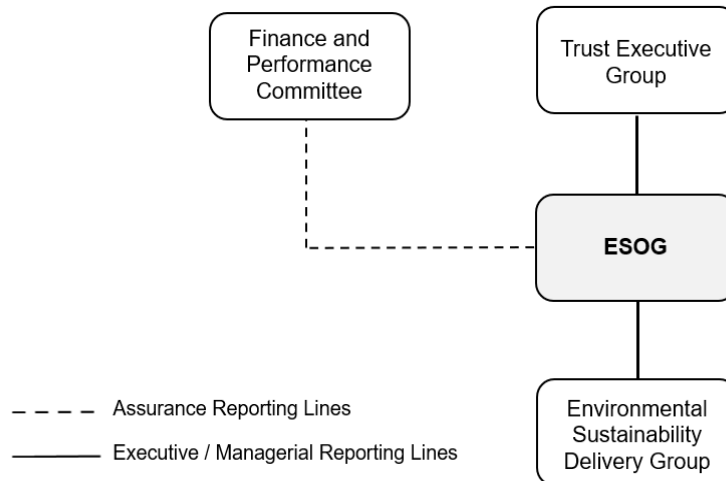
3.1.5.1 The relevant legislation identified in the Appendix A and their application to YAS is outlined in a register of regulations and legislation. This will be located in the Estates Department online folders and updated when new and relevant regulations and legislations are identified.

3.1.6 Register of Environmental Projects and Actions

3.1.6.1 A register of environmental projects and actions will be maintained by the Environmental Sustainability Group (ESDG) to provide a comprehensive list of relevant direct and indirect environmental effects arising from the processes and activities undertaken by YAS and will form the basis of the Trust Green Plan

3.2 Organisation

3.2.1 The Risk Management Strategy of YAS defines the structure within which risk is managed within the organisation. Environmental issues are an integral part of YAS's risk management system and significant operational risks are put on the Estates Risk Register. The following structure diagram confirms the relationship between the Trust Executive Group (TEG), Environmental Sustainability Oversight Group (ESOG), Environmental Sustainability Delivery Group (ESDG) and assurance through to the Finance and Performance Committee:



3.2.2 As part of the Trust's corporate governance structure:

- ESOG has an executive / managerial line to the Trust Executive Group.
- ESOG has an assurance reporting line to the Finance and Performance Committee.
- ESOG is the parent body of, and has executive direction over, the Environmental Sustainability Delivery Group (ESDG)

3.2.3 The ESDG will lead its individual task and finish groups in working towards delivery of its environmental objectives, as set out in the Green Plan. The ESDG group will ensure the consistent implementation of the Environmental and Sustainability Policy and Green Plan.

3.2.4 Environmental issues are included with practical objectives and targets set out in the Green Plan. Sustainable Development has a broader remit than the environment and incorporates aspects from the 'triple bottom line' of environment, society and economy.

3.2.5 Targets to achieve Net Zero emissions are also included in areas such as Finance and Procurement where YAS Trust business cases are required to include carbon life cycle costs or Networking and Partnerships where the Trust furthers climate change action in any Local Strategic Partnership.

3.2.6 The major environmental issue of climate change is managed by the Trust under the Board of Directors approved Carbon Management Plan (CMP). In 2009, YAS joined the Carbon Trust Programme which set out targets for carbon reduction up to 2015. This has since been updated with Sustainable Development Management Plans and a Green Plan. The refreshed Green Plan details actions that will need to be implemented between 2025 and 2028. Performance relating to carbon emissions are reported in the Green Plan. Responsibility for the programme ultimately rests with the ESOG and ESDG.

4.0 Training expectations for staff

- 4.1 Staff will be trained in environmental action within their subject area.
- 4.2 Carbon Champions (interested individuals from across the Trust) are regularly informed through Trust wide communications and updates of the green issues that affect them and the Trust. Carbon Champions also form part of the membership of ESDG.
- 4.3 As part of the national Carbon Literacy Action Days, YAS offers all staff the opportunity to become carbon literate. Carbon literacy training will be provided for staff to increase their knowledge of climate change and legislation related to the environment.
- 4.4 The Net Zero NHS training is mandated on ESR for all staff to undertake.

5.0 Implementation Plan

- 5.1 The latest approved version of this document will be posted on the Trust intranet site for all members of staff to view. New members of staff will be signposted to how to find and access this guidance during Trust Induction.
- 5.2 All directorates are responsible for ensuring that a full Environmental and Sustainability implementation plan is developed in relation to their department and responsible for embedding new policies and procedures

6.0 Environmental and Sustainability implementation Plan

6.1 Sustainability

- 6.1.1 The Trust aims to:
 - create a sustainable, green, world class ambulance service
 - eliminate their carbon footprint from their activities
 - reduce emissions from our fleet, working towards zero/low emissions
 - reduce emissions from our estates, working towards a zero emissions estate with the generation of our own electricity as well as procuring zero emission electricity
 - reduce emissions through our procurement choices
 - choose more Fairtrade and sustainable procurement
 - Refurbish ambulance stations and offices to a BREEAM good standard as a minimum or retro fit energy saving equipment where feasible
 - create zero emission ambulance stations for the future
 - educate and engage staff on green issues and low carbon technologies
 - achieve Net Zero targets as laid down in law and under the Greener NHS requirements

6.2 Targets and objectives

- 6.2.1 The Trust will set environmental targets and goals to enable monitoring of progress and to assist in improving environmental performance. The Net Zero Targets have been laid out in the Green Plan and follow the national Greener NHS agenda and the national legislation.

6.3 Training and awareness

- 6.3.1 The Trust has put in place appropriate training in the form of a Carbon Net Zero online training package for newly inducted staff which is to provide guidance to ensure that all staff understand the environmental impact of their actions at work and to ensure that environmental policies are properly implemented.
- 6.3.2 The Trust's Environmental and Sustainability Policy and associated guidance will be made readily available to all staff via the Trust intranet site. The Trust's Green Plan is also available on the intranet.

6.4 Energy Use

- 6.4.1 The Trust will:
- seek to make use of sustainable and environmentally safe energy sources where practicable
 - encourage staff to reduce energy consumption
 - continually invest in improving the energy performance of its assets through upgrades and a practice of replacing with greener, more efficient technologies
 - continue to use renewable electricity supply
 - seek to divest from a fossil fuel gas utility supply

6.5 Estates and Premises

- 6.5.1 The Trust will:
- provide a safe and environmentally friendly environment for staff
 - employ an environmentally sustainable approach to all new developments and refurbishments
 - retrofit our existing estate with efficient lighting, heating, cooling and insulation systems and ensure that they are Net Zero ready
 - ensure that new builds are built to a Net Zero emission standard

6.6 Resource Consumption

- 6.6.1 The Trust will:
- minimise its impact on the environment by adopting a sustainable procurement policy with a weighting applied to tender evaluations
 - ensure that suppliers recognise and reduce the environmental effect of their products and transportation
 - encourage conservation of resources by their efficient use and careful planning of its activities such as the use of local labour where possible or a reduced number of visits to site
 - assess the circular economy of products where applicable

6.7 Procurement

- 6.7.1 The Trust is committed to improving the environmental performance of the NHS supply chain. The Trust's purchasing activity will contribute to Government environmental objectives and to reaching minimum standards of environmental performance.

6.7.2 Procurement logistics are coordinated to minimise the impact on the environment through vehicular movement.

6.8 **Sustainable procurement**

6.8.1 The aim of the Trust should be to ensure that goods and services purchased for use should be manufactured, delivered, used and managed at end-of-life in an environmentally and socially acceptable manner. This will enable the Trust to meet the procurement targets set under the NHS Framework for Sustainable Development. Modern Slavery and Social Value are also incorporated into and form part of the Procurement Strategy.

6.8.2 The Trust will also work with the supply chain to achieve net zero targets as part of the Scope 3 emissions (supply chain emissions).

6.9 **Fleet and Travel**

6.9.1 The Trust will seek to:

- minimise the effects of operational travel by management of logistics
- assess the Patient Transport Service, 999 and Unscheduled Care Service mileage
- make amendments to routes and actively looking to maximise fuel savings
- reduce the carbon emissions from the vehicles through greener vehicular buying choices
- assess the models of care and the appropriate use of vehicles
- encourage staff to make green travel choices for transport to/from work as well as for fitness/pleasure by offering a cycle to work scheme and providing a secure bicycle storage area

6.10 **Fleet**

6.10.1 The Trust will seek to:

- reduce the adverse environmental impact of our activities, including air, land, water and noise pollution
- reduce the adverse environmental impact of our activities through the procurement, use and final disposal of the vehicles within our fleet;
- procure the least polluting vehicles available where practicable and be compliant with emissions restrictions for inner cities
- ensure that the fleet are transitioning to zero emission vehicles within the timeframe laid out in the NHS's Net Zero Travel and Transport plan
- choose zero emission vehicles by default from 2027 for personal leased vehicles and from 2030 for all vehicles from 2030.
- assess the whole life environmental impact of our vehicles
- look at whole vehicle life cycle analysis prior to procuring our vehicles (i.e. look at the vehicle use, vehicle duty cycle, fuel consumption, consumable consumption)
- move our fleet to zero emission vehicles in the next few years with the infrastructure to support the transition
- roll out EV charging within the estate to support the transition to zero emission vehicles
- where appropriate, install EV charging for staff

6.10.2 The Fleet department is working to reduce the CO2 emissions from the fleet by choosing the lowest emission and zero emission vehicles.

6.11 Waste Management

6.11.1 The Trust aims to encourage:

- efficient use of resources through minimising of waste and through the conservation, re-use and recycling of resources wherever possible
- waste management will ensure that there is no waste sent to landfill and an increase in recycling
- recycling programmes in place across the Trust and implemented through appropriate training and purchasing procedures

6.12 Chemical, Fuel and Oil Storage

6.12.1 In order to manage the chemicals to the best capacity that the organisation can, several storage aspects should be implemented:

- Store chemicals away from storm drains, sewers and watercourses
- store away from vehicle movement areas and comply with COSHH regulations where applicable
- all containers should be labelled
- storage container should be locked when not in use to prevent vandalism and theft
- All fuel should be stored in locations ideally above ground in bonded, double skinned tanks
- YAS must comply with the general requirements of the superseded Oil Storage Regulations

6.13 New Building Construction

6.13.1 All new builds will comply with the BREEAM standard of Excellent and YAS will endeavor to apply more sustainable technologies and implement the most up to date technology in order to ensure that the buildings are 'futureproof'. In addition, the Trust will protect visual amenity and biodiversity by careful planning of all new developments, and the Trust will cooperate with Local Authority partners in support of sustainable development strategies.

6.14 Biodiversity

6.14.1 The Trust will ensure that biodiversity is included in plans for sites. We will include a tree planting assessment and programme across the estate as well as a biological assessment to ensure an increase in biodiversity. To comply with the Biodiversity Net Gain requirements will ensure that we increase biodiversity on our sites but also ensure that we assess what we have on our sites and seek to preserve our biodiversity. The Biodiversity Plan supports this.

7.0 Monitoring compliance with this Policy

7.1 Compliance with the Policy will be monitored reported at the ESG Group.

Minimum requirements to be monitored	Process to be used for monitoring	Responsible individual/ committee for carrying out monitoring	Frequency of monitoring	Responsible individual/ committee for reviewing the results	Responsible individual/ committee for developing an action plan	Responsible individual/ committee for monitoring the action plan
Compliance with Policy and Legislation	Analysis of environmental audits	Energy and Sustainability Manager	annual	ESDG	Energy and Sustainability Manager	ESDG

7.2 The process of review will be both reactive (investigating compliance with this Policy following an incident) and proactive (assessing compliance in a planned manner). The review will be conducted by the ESDG and approved by the ESOG Any lessons learnt will be shared with the ESOG as part of the review.

7.3 Progress on meeting objectives and targets will be regularly reviewed at the ESDG meetings.

7.4 **Key Performance Indicators**

7.4.1 The following key performance indicator will be used by the ESOG and ESDG to establish trends, areas for potential improvement and effectiveness of the Policy:

- A reduction in Ad hoc incidents or areas of non-conformance identified as a result of the yearly environmental audit.
- A reduction of the Trusts carbon footprint

7.4.2 The ESOG will receive a 12 monthly review of progress.

8.0 **References**

8.1 This Policy should be read in conjunction with the following policies, procedures and strategies:

- Waste Management Policy
- Lease Car Policy
- Health and Safety Policy
- Fire Safety Policy
- Procurement Policy
- COSHH Policy
- Electric Vehicle Charging Policy
- Biodiversity Plan
- Green Plan
- Climate Adaptation Plan
- Other environmental legislation presented in Appendix A

9.0 **Appendices**

9.1 This Policy includes the following appendices:

- Appendix A - Summary of Environmental Legislation
- Appendix B - Roles & Responsibilities

Appendix A - Summary of Environmental Legislation

- Environmental Protection Act 1990
- Environmental Protection (Prescribed Processes and Substances) Regulations 1991
- Clean Air Act 1993
- Hazardous Waste Regulations 2005
- Waste (England and Wales) Regulations 2011
- Controlled Waste Regulations 1992
- Waste Electrical and Electronic Equipment (WEEE) regulations
- Control of Pollution Act (COPA) 1974
- Environmental Permitting Regulations 2010 (replaced Waste Management Licensing Regulations)
- Water Industry Act 1991
- Water Resources Act 1991
- Trade Effluents (Prescribed Processes and Substances) Regulations 1989
- Special Waste Regulations 1996 (Amendments 1996 & 1997)
- Groundwater Regulations 1998
- Ionising Radiations Regulations 1985
- Carriage of Dangerous Goods by Road Regulations 1996
- Noise and Statutory Nuisance Act 1993
- The Anti-Pollution Works Regulations 1999
- Health and Safety at Work etc. Act 1974
- COSHH Regulations 1999
- The Producer Responsibility Obligations (Packaging Waste) Regulations 1997 (plus amendments)
- Packaging (Essential Requirements) Regulations 1998
- Environmental Protection (Controls on Substances that Deplete the Ozone Layer) Regulations 1996
- The Climate Change Levy (April 2001)
- Town and Country Planning (Environmental Impact Assessment) (England and Wales) Regulations 1999
- Climate Change Act 2008
- Carbon Reduction Commitment under Part 3 of the 2008 Climate Change Act
- Climate Change Act 2008 (2050 Target Amendment) Order 2019
- 2012 Social Values Act
- Landfill Tax Regulations
- CFC phase out directive
- Ozone depletion substance directive
- Oil storage regulations 2001 and PPG2
- Companies Act – greenhouse gas reporting
- Animal by products regulations
- Notification of cooling towers and condensers
- Pesticides regulations
- Batteries and Accumulators Regulations
- Wildlife and Countryside act 1981 with the Protected Species and Schedule 9 – invasive species
- HSWA/HSE guidance for Legionella
- Water Supply and Fittings regulations
- Control of Asbestos regulations
- Environmental Damage Regulations 2009
- Scrap Metal Dealers Act
- Fluorinated gas regulations

- Air conditioning and high voltage switchgear (SE6)
- Registration, Evaluation, Authorisation and Restriction of chemicals (REACH)
- Restriction of Hazardous Substances Directive
- Energy Performance Building regulations
- End of Life vehicles regulations
- Transfrontier shipment regulations
- Carriage of dangerous goods and use of transportable pressure vessels
- COMAH
- Radiation/Radioactive sources
- BREEAM Assessment for new buildings and retrofit standards
- Energy Savings Opportunity Scheme
- Petroleum Licensing
- PPGs (Storage of diesel)
- Manufacture and storage of explosives regulations 2005
- Civil Contingencies Act 2004
- Public Services (Social Value) Act 2012
- HMT Sustainability Reporting Framework
- Biodiversity Net Gain
- Greener NHS Net Zero Targets
- Environment Act 2021

Appendix B - Roles and Responsibilities

Responsible staff

The responsibilities of individuals and Trust staff are presented below.

The Chief Executive

The Chief Executive will assume overall responsibility for ensuring that environmental issues are effectively addressed within YAS. The Trust must be compliant with national and, where applicable, international environmental legislation.

Executive Directors

Executive directors are responsible for ensuring that the Trust's Environmental and Sustainability Policy is effectively implemented within their own Directorates. In particular, Directors should ensure that Directorate work stream action plans are developed, implemented and progressed to contribute towards achieving the aims and objectives of the annual business planning schemes, Strategic documents and Green Plan with outcomes and achievements regularly monitored and reviewed.

The Executive Director of Finance has Board level responsibility for this Policy

Net Zero Board Lead

The Net Zero Board Lead is responsible for working with the Integrated Care Systems/Boards and ensuring that reporting is undertaken to the responsible bodies.

Environmental and Sustainability Oversight Group

ESOG approval will be obtained for this document. The Environmental, Estates, Procurement and Fleet departments will all contribute and review this document.

All Trust Managers are responsible for contributing towards the development of Directorate environmental work stream action plans, for implementing and delivering agreed environmental actions and for monitoring and reporting progress towards achieving environmental targets.

All Trust Managers should ensure that directly managed staff are made aware of the Trust Environmental and Sustainability Policy and of the Trust's commitment towards environmental management. Staff should be encouraged to participate in and fully support environmental initiatives and to put forward suggestions for environmental improvements. In particular managers should:

- reinforce the need for staff to minimise energy and utility usage by observing good housekeeping measures
- support staff in undertaking environmental training as appropriate
- assist staff in accessing and implementing environmental guidance
- contribute towards minimising the effect of operational travel by management of logistics and journey efficiencies
- support staff seeking to make use of environmentally friendly alternative travel opportunities, e.g. walking or cycling to work, car sharing and public transport
- encourage staff to minimise the production of waste and maximise the reuse and recycling of waste material.

Director of Estates and Fleet

The responsibility for environmental and carbon management within YAS and the implementation of this policy has been delegated to the ESG by the TEG. The Board of Directors responsibility for environmental management consequently resides with the Chief Executive.

The responsibilities identified include that:

- A Sustainable Action Plan is presented to YAS Board of Directors
- A Green Plan is prepared every 3 years with annual updates provided to the Board and Trust Executive Group according to the requirements of the Greener NHS and ICS board
- Environmental risks and issues feature in YAS Corporate Strategy
- Appropriate resources are identified for the control of environmental risks

Environmental Lead

It is the responsibility of the Energy and Sustainability Manager to update this Policy and to ensure that consultation with stakeholders, members of ESDG and external bodies to collate up to date information on legislative requirements is conducted.

The ESDG will review the Environmental and Sustainability Policy as required and will update it on an annual basis.

Net Zero Lead

The Net Zero Lead is also the Energy and Sustainability Manager and will report to the responsible bodies.

All Trust Staff

All staff will be expected to comply with and support the YAS Environmental and Sustainability Policy with identified practices and procedures. Members of staff are required to support this policy by familiarising themselves with the policy and complying with its requirements. Trust employees have the following responsibilities under this policy:

- to support and participate in implementing agreed environmental action plans
- to become familiar with the Trust Environmental and Sustainability Policy, support the Trust's commitment towards environmental management in all aspects of their work and put forward suggestions for environmental improvements
- to minimise energy and utility usage by observing good housekeeping measures
- to participate in environmental training as appropriate
- to minimise the production of waste and maximise the reuse and recycling of waste material