NHS

Northumbria Healthcare
NHS Foundation Trust

RMP 08

Northumbria Healthcare NHS Foundation Trust

Risk Management Policies and Procedures

Environmental Management Policy

Version	7
Sub Committee and Approval Date	Sustainability and Management Implementation Group, 26/01/2023
Date Ratified by Assurance Committee	18/07/2023
Name of Policy Author	Mike Blades Energy and Sustainability Officer
Date Issued	26/07/2023
Review Date	26/07/2023
Target Audience	All Staff

This policy has been impact assessed against the Equality Act 2010

History of previous versions of this document:

Approved by Sub Group	Approved by Assurance Committee	Version	Issue Date	Review Date	Contact Person
04/07/2019	09/07/2019	06	18/07/2019	18/07/2022	Mike Blades Energy & Sustainability Officer
16/07/2015	08/09/2015	05	21/10/2015	08/09/2018	Mike Blades Energy & Sustainability Officer
21/12/2011	23/03/2012	04	12/06/2012	23/03/2015	Mike Blades Energy & Sustainability Officer
10/07/2008	22/07/2008	03	Jul 2008	Jul 2011	Ray Pate Head of Support Services
Dec 2003	Jan 2004	02	Jan 2004	Jan 2005	Ray Pate Head of Support Services
-	Apr 2000	01	May 2000	May 2001	Ray Pate Risk Management Coordinator

Statement of changes made from version 06:

Version	Date	Description
07	Jan 23	Updated purpose to include NHS procurements include a minimum 10% net zero weighting; enhanced roles section

Contents

1. Operational Summary

Policy Aim

The policy aims to provide guidance to managers and staff on the Trust's policy and strategy for environmental management.

Policy Summary

This policy identifies responsibilities for environmental management within the Trust. It examines the Trust's strategy for environmental management by looking at key areas of environmental performance & sustainability (energy, waste, water, transport and purchasing), examining how the Trust will endeavour to improve its performance across these areas. It goes on to look at other environmental issues and identify priority areas and key performance indicators.

What it Means for Staff

Managers - are responsible for ensuring that adequate arrangements are in place for this policy to be fully implemented at ward and department level.

All Trust Employees - are responsible for acquainting themselves with this policy, following the guidance contained in it to help reduce the use of power, water and other resources and to ensure appropriate segregation of waste, minimising waste by implementing the 5 stages of waste management, refuse, reduce, reuse, repurpose or recycle where practicable.

Policy Author - The policy author has followed RMP17, Policy for the Development and Management of Trust wide Policies/Procedural Documents, assuring that all the relevant content is provided in this policy document.

Chief Executive Officer - The Chief Executive Officer is responsible for the Trust wide implementation of this policy. The Chief Executive Officer has delegated this responsibility to the Director of Estates and Facilities. The Director of Estates will appoint a Responsible Officer who must have Environmental Management experience to implement, monitor, record and report on all aspects of this policy directly to him or his nominated deputy.

2. Introduction

Northumbria Healthcare NHS Foundation Trust acknowledges the potential impact that its activities have on the environment and is committed to ensuring environmental management is an integral part of healthcare provision.

The trust has an obligation under the Environmental Protection Act 1990 and The Environment Act 2005 to manage and reduce its environmental impact and in terms of guidance from Healthcare Technical Memorandums issued by the Department of Health.

In particular Healthcare Technical Memorandum HTM: 00 identifies healthcare waste, energy, travel & transport, water, recovery/recycling and planning, design, construction, refurbishment of health and social care buildings as the primary areas to be considered.

3. Purpose

The Trust's Environmental Management Policy has been drawn up to protect the environment from the harm, which may result from its work activities and covers environmental management on all Trust premises, and by all Trust employees.

Environmental issues have an effect on the health and safety of patients, visitors and staff. The Trust will aim to integrate risk management into all aspects of our environmental management systems in order to protect people and the environment.

The objectives of the environmental management policy will be:

- To protect the environment from the potential impact of Trust activities on the environment.
- To comply with legal requirements imposed by the Environmental Protection Act 1990, along with all other relevant legislation, fulfilling the Trust's duty of care to its employees and the general public.
- To comply with NHS guidance and adopt an approach based on the principles of sustainable development
- To establish an Environmental Management System (EMS) which will allow the Trust to make a significant contribution to sustainable development
- To operate within the limits of the Environmental Management System, whilst achieving defined objectives and demonstrating a commitment to continuous improvement
- To ensure the most efficient use of energy, water and material resources and where viable invest in technology to conserve resources.

- To minimise the production of waste, by employing the 5R's of the Waste Hierarchy, which includes refuse, reduce, reuse, repurpose and recycle waste where practicable and dispose of remaining wastes through safe and appropriate methods.
- To adequately control all wastes, discharges and emissions
- To ensure green, sustainable and active transport plans are in place across Trust sites
- To incorporate the aims of sustainable development into purchasing activities, contract specifications and construction projects
- Ensure NHS procurements include a minimum 10% net zero weighting

4. Duties

The Trust has a responsibility to ensure that its work activities and waste products do not constitute a threat to the environment.

4.1 Roles & Responsibilities

Responsible Person (Director of Estates & Facilities)
The Director of Estates and Facilities will be responsible for the implementation of this policy in accordance with the strategy included in this document.

Appointed Person
Environmental management is a line management responsibility. Executive Directors, Chief Operating Officers, Clinical Directors, General Managers, Ward and Department Managers are accountable for environmental protection in their own area of responsibility. Managers are responsible for ensuring that adequate arrangements are in place for this policy to be fully implemented at ward and department level. This will include:

- Minimising waste and ensuring the correct and appropriate segregation of waste;
- Waste recycling, reuse and repurposing where safe and practicable
- Preventing overheating
- Not heating unnecessary areas, especially when they are not in use
- Ensuring equipment (lights, photocopiers. Computers etc.) are switched off when not required
- Minimising water use by ensuring taps are not left running
- Reporting any identified issues to relevant estates departments, i.e. dripping taps
- Ensuring no hazardous solutions are discharged to drain
- Encouraging car sharing particularly to attend meetings

- Encourage active and sustainable forms of travel
- Use technology to arrange on-line meetings to reduce and remove unnecessary travel
- Contain any spillages and prevent from entering drains or soils
- Ensure staff are fully aware of their responsibilities, supporting reductions in energy use and carbon emissions through improved behaviors

Successful implementation of this policy will require the co-operation of every employee whilst at work. Employees have a duty to support the reduction in the use of power, water and other resources and to ensure appropriate segregation of waste and minimise waste by recycling, reusing and repurposing where practicable.

5. Definition of Terms Used

Appointed Person	A line manager with responsibility to implement policy
BREEAM	Building research establishment Environmental Assessment Method
BS8555	Recognised British Standard EMS
Drain	Entry point to the sewerage or storm water systems
EMS	Environmental Management System
IC	Infection Control
ISO140001	Recognised International EMS standard
Responsible Officer	A line manager with environmental management experience
RMP	Risk management Policy

6. Process

6.1 Processes and Systems

The Trust will ensure that processes and systems are operating as they should by documenting policies, procedures, standards and guidelines in all areas where an absence of documented procedures could lead to deviations from the environmental management strategy, its objectives and targets.

Contingency plans will be developed to cover action to take in emergency situations (e.g. chemical spillages) in order to minimise the environmental impacts associated with them.

The Trust shall establish a system of periodic audits to determine the level of compliance with environmental management systems. This shall be done through completion of the BREEAM in Use (BIU) tool.

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Where non-compliance is discovered the cause will be identified along with the necessary corrective actions and an action plan will be developed. Controls will be implemented or modified to avoid repetition of the non-compliance, and the changes will be recorded in written procedures.

The Environmental Management Policy will be subject to periodic review to ensure its continued suitability, adequacy and effectiveness. The review will address the need for changes to policies, procedures and objectives in the light of legislative changes, audit results, and the commitment to continual improvement.

6.2 Risk Assessments

A trust compliant risk assessment shall be carried out quarterly to ensure that all legislative requirements and targets are being met and action plans produced to mitigate.

6.3 Environmental Management System

A major objective is to establish an Environmental Management System (EMS) which will allow the Trust to make a significant contribution to sustainable development in the long term. In simple terms an EMS can be described as a formal mechanism by which an organisation can:

- identify and manage its environmental impacts
- formulate and implement environmental policy commitments
- facilitate and demonstrate continual improvement of environmental performance.

Physically an EMS is a set of policies, plans, procedures and records which address the environmental aspects of an organisation's activities. The main requirements of this would include:

- creating a register of environmental impacts identifying and evaluating the effects of the Trust's activities in terms of:
  - emissions to atmosphere
  - discharge to drain
  - household, clinical and special waste
  - vehicle access
  - potential land contamination
  - noise pollution
  - use of resources
  - effect on the landscape

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- an environmental management strategy setting out objectives and targets for the main operation activities which can have an effect on the environment
- associated environmental policies and strategies covering the implementation and operation of the EMS, particularly in the key areas of:
  – energy management
  – waste management
  – transport (travel plans)
  – in addition policies covering COSHH, legionella and asbestos management should be read in conjunction with this policy
- key performance indicators which will allow us to check on progress and performance
- a register of legislation, guidance and codes of practice relevant to the environmental aspects of the Trust's activities.

7.   Training

All personnel involved in maintaining, servicing, altering or monitoring the energy or water services must be trained in all the latest updates and amendments to Department of Health, HSE or any other relevant bodies policies to ensure full compliance to those changes. This will involve the Appointed Person, Craftsmen, Supervisors and Technicians. Training records will be maintained and logged by the Estates Department and reviewed on an annual basis.

All projects staff involved in designing and managing projects shall ensure that the appropriate BREEAM tools are used and all designs meet, as a minimum the latest environmental legislation and building regulations. To achieve this they must ensure that they attend appropriate training and refresher course in the relevant legislation.

8. Monitoring and Review

This Policy and Procedure will be monitored by the Responsible Person and formally reviewed annually:

Monitoring / audit arrangements	Methodology	Reporting		
		Source	Committee	Frequency
Duties:				
Audit	Review of reporting arrangements	Policy author	EFC	Upon changes in national policy
Audit	Review of risks relating to energy, water and carbon emissions with respect to legislation	Sustainability team	EFC	Quarterly
Audit	Annual audit of information required for and submissions of data to Environment Agency	Energy & Sustainability officer + external auditor	EFC with legislative requirement to include Chief Executive	Annually

9. Reference Documents

Following is a list of some of the environmental and health and safety legislation and guidance which is relevant to the operation of NHS facilities.

- Air Quality Standards Regulations 2010
- Anti-Pollution Works Regulations 1999
- The Carriage of Dangerous Goods and Use of Transportable Pressure Equipment Regulations 2009
- Clean Air Act 1993
- Climate Change Act 2008 (amended 2019)
- Contaminated Land (England) Regulations 2006
- Control of Pollution Regulations 1996
- Control of Pollution Act 1974
- Control of Pollution (Amendment) Act 1989
- Control of Substances Hazardous to health Regulations 2002
- Controlled Waste Regulations 2012
- Environment Act 1995

- Environment Act 2021
- Environmental Protection Regulations 1992
- Environmental Protection (Control of Ozone Depleting Substances) Regulations 2002
- Environmental Protection Act 1990
- Environmental Protection Regulations 1996
- Environmental permitting (England and Wales) (amendment) regulations 2012
- Hazardous Waste Regulations 2005
- Health and Safety at Work Act 1974
- Health Technical Memorandum 07-07: Sustainable Health and Social Care Buildings
- Landfill Tax Order 2011
- Landfill Tax Regulations 2013
- National Health Service and Community Care Act 1990
- Noise Act 1996
- Environmental Noise (England) regulations 2006
- Noise and Statutory Nuisance Act 1996
- Packaging Producer Responsibility Regulations 1997
- The Producer Responsibility Obligations (Packaging Waste) Regulations 2007
- Pollution Prevention and Control Act 1999
- Special waste (Amendment) Regulations 1997
- Special Waste Regulations 1996
- Sustainable Development in the NHS (NHS Estates) 2001
- The Eco-design for Energy-Related Products (Amendment) Regulations 2011
- The Infrastructure Planning (Environmental Impact Assessment) (England) (Amendment) Regulations 2011
- The Town and Country Planning (Environmental Impact Assessment) (England) (Amendment) Regulations 2011
- The Climate Change Act 2008
- Waste Management Regulations 1996
- Waste Management (England & Wales) Regulations 2006
- Waste Management Licensing Regulations 1994 (Amended)
- Water Act 2003
- Water Industry Act 1999
- Water Resources Act 1992

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10. Associated Documents

The reader is drawn to other documents that should be read in conjunction with this policy.

- IC11 Cleaning and disinfection Policy
- IC34 Water Safety Policy
- RMP01 Risk Management Strategy
- RMP02 Health & Safety Policy
- RMP03 Reporting and Management of Incidents
- RMP06 Waste Management Policy
- RMP07 Control of Substances Hazardous to Health
- RMP12 Medical Devices Policy
- RMP30 Medical Gas Policy
- RMP 9 Energy Management Policy
- RMP42 Radiation Policy
- RMP49 Asbestos Policy
- Trust Travel Plan Incorporating Individual Site Plans
- Sustainability Management Implementation Plan

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Appendix 1 - Environmental Management System

1   Introduction

1.1   The following sections detail the procedures for implementation of the environmental management policy for the key areas of:
- energy management
- waste management
- water management
- transport
- purchasing
- other environmental management issues

2   Energy Water and Carbon Management

2.1   The reader is referred to the latest version of RMP39 Energy Water & Carbon Emissions Policy

3   Waste Management

3.1   The reader is referred to the latest version of RMP06 Waste Management Policy.

4   Transport

4.1   The reader is referred to the latest version of Trust Travel Plan incorporating Individual Site Plans

5   Procurement Policy

5.1   The trust aims to develop a procurement policy with procurement shared services.

6   Other Environmental Management Issues

6.1   Site Drainage

6.1.1   There are two types of drain, foul water and surface water. Foul water drains are designed to carry contaminated waste water to a sewage works for treatment. Surface or clean water drains are designed to carry only uncontaminated rainwater and will lead directly to a local river, stream or soak away. Problems arise when wrong connections allow pollutants to enter surface water drains.

6.1.2   It is important to ensure that there are no wrong connections above or below ground. Sinks in a number of areas will be used as a convenient means of waste disposal. It is therefore essential to ensure that sinks are correctly connected to the foul water system. Many other facilities as well as toilets, sinks and wash basins must also be drained to the foul water system.

These include mess rooms, darkrooms, showers, canteens, laboratories, dishwashers and washing machines.

6.2 Deliveries of Potential Pollutants

6.2.1 Special care must be taken during deliveries, particularly when hazardous substances and materials are being handled. Deliveries should be supervised at all times. Establishing safe procedures and making someone responsible for supervising deliveries can help avoid spillages, preventing damage to the environment and saving raw materials.

6.3 Storage of Potential Pollutants

6.3.1 Bulk storage of oil and chemicals represents a major threat to the water environment. The potential for accidental spillage is greatest during deliveries, but storage facilities also pose a risk. Storage tanks should be protected by a bund wall. Bund walls should be regularly checked to ensure that they are secure. The wall and floor must be impermeable to the material stored in it, and there should be no drains or valves. Overflow pipes on all tanks should discharge within the bunded area. Rainwater may collect within bunded areas, and should be regularly pumped out.

6.3.2 To prevent oil pollution, oil separators (interceptors) should be placed on any surface water drains which could be at risk from possible oil contamination, including vehicle parking areas. Oil interceptors must be maintained and emptied regularly, be designed to a sufficient size, and be protected from detergents. Water containing detergents must be prevented from draining into oil separators, as this will render them useless and allow oil to be washed through.

6.4 Cleaning

6.4.1 All cleaning agents are potentially polluting. Yard and parking areas should not be cleaned by hosing to surface water drains.

6.4.2 Washing operations should be carried out in areas which drain to the foul water sewer. No detergents are suitable for discharge to surface water drains, even those described as bio-degradable.

6.5 Emissions into the Atmosphere

6.5.1 The Clean Air Act 1993 controls the emission of dark and black smoke, grit and dust into the atmosphere. The Trust will prevent the emission of dark smoke from chimneys into the atmosphere.

6.5.2 The Trust will prevent noxious or offensive gases being emitted into the atmosphere from Trust premises. Any substances which are discharged into the atmosphere must be rendered harmless and inoffensive.

6.6   Noise

6.6.1   The Trust will limit noise levels from plant and machinery that might constitute a statutory nuisance as required by the Environmental Protection Act 1990. The local authority has the power to serve a notice on the occupier of premises requiring abatement of a noise nuisance or prohibiting or restricting its occurrence or recurrence.

6.7   Grounds and Gardens

6.7.1   The Trust will ensure that all pesticides, insecticides and weed killers used on Trust premises are environmentally friendly, and will comply with all relevant Conditions of Approval for use.

6.8   Training and Support

6.8.1   The Trust will ensure staff are trained in waste disposal routes and the actions to take in the event of a spillage of clinical waste or hazardous substances. We will reinforce staff training with regular refresher training, and include spillage procedures and waste disposal in all induction training.

6.9   Sustainability

6.9.1   The Trust has set up a Sustainability Management Implementation Group (SMIG). The aim of this group is to manage the reduction of carbon emissions associated with the Trusts activities, which align to key areas such as energy, waste, travel & transport and procurement.

6.9.2   The reporting process for SMIG uses a key-issues report which goes to the Finance Investment and Performance committee via an Estates and Facilities performance and compliance process.

6.9.3   The carbon reduction target for the Trust align to the National NHS Strategy – "Delivering a Net Zero Future". This includes:

- For the emissions we control directly (the NHS Carbon Footprint), we will reach net zero by 2040, with an ambition to reach an 80% reduction by 2028 to 2032;

- For the emissions we can influence (our NHS Carbon Footprint Plus), we will reach net zero by 2045, with an ambition to reach an 80% reduction by 2036 to 2039.

6.9.4   The carbon reduction target will be achieved by identifying individual opportunities to be evaluated and approved by SMIG and implemented by each stream lead.

6.9.5   The Trusts Green Plan provides the overall aims and ambitions in relation to net zero and is the trusts key strategic delivery document, which sets the aims, ambitions and actions towards net zero targets.

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Appendix 2 - Equality Impact Assessment

To be completed for all key policies. Cite specific data and consultation evidence wherever possible.

Duties which need to be considered:

- Eliminate unlawful discrimination, harassment and victimisation and other conduct prohibited by the Act

- Advance equality of opportunity between people who share a protected characteristic and those who do not

- Foster good relations between people who share a protected characteristic and those who do not

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PART 1 – Overview

Date of equality impact assessment:

Jan 2023

Name(s) and role(s) of staff completing the assessment:

Mike Blades

Overall, what are the outcomes of the policy?

To provide guidance to managers and staff on the Trust's policy and strategy for environmental management

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PART 2 – Relevance to different Protected Characteristics

Answer these questions both in relation to people who use services and employees as appropriate

Protected Characteristic	Does this characteristic have specific relevance to this policy?	If No – Please state why:	If Yes – What do you know about usage of the services affected by this policy by people in this protected group, about their experiences of it, and about any current barriers to access?	Could people in this protected group be disproportionately advantaged or disadvantaged by the policy?	Could the policy affect the ability of people in this protected group participate in public life? (e.g. by affecting their ability to go to meetings, take up public appointments etc.)	Could the policy affect public attitudes towards people in this protected group? (e.g. by increasing or reducing their presence in the community)	Could the policy, change make it more or less likely that people in this protected group will be at risk of harassment or victimisation?	If there are risks that people in this protected group could be disproportionately disadvantaged by the policy are there reasonable steps or adjustments that could be taken to reduce these risks?	Are there opportunities to create positive impacts for people in this protected group linked to this policy?
Disability Note: "disabled people" includes people with physical, learning and sensory disabilities, people with a long-term illness, and people with mental health problems.	No	No specific impacts identified							
Sex Note: all policies should be gender neutral and use pronouns such as them, their and they, not he/she; her/him	No								
Age	No								

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Protected Characteristic	Does this characteristic have specific relevance to this policy?	If No – Please state why:	If Yes –						
			What do you know about usage of the services affected by this policy by people in this protected group, about their experiences of it, and about any current barriers to access?	Could people in this protected group be disproportionately advantaged or disadvantaged by the policy?	Could the policy affect the ability of people in this protected group participate in public life? (e.g. by affecting their ability to go to meetings, take up public appointments etc.)	Could the policy affect public attitudes towards people in this protected group? (e.g. by increasing or reducing their presence in the community)	Could the policy, change make it more or less likely that people in this protected group will be at risk of harassment or victimisation?	If there are risks that people in this protected group could be disproportionately disadvantaged by the policy are there reasonable steps or adjustments that could be taken to reduce these risks?	Are there opportunities to create positive impacts for people in this protected group linked to this policy?
Race Note: For the purposes of the Act 'race' includes colour, nationality and ethnic or national origins.	No								
Religion or belief Note: In the Equality Act, religion includes any religion. It also includes a lack of religion. Belief means any religious or philosophical belief or a lack of such belief.	No								
Sexual Orientation Note: The Act protects bisexual, gay, heterosexual and lesbian people.	No								

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Protected Characteristic	Does this characteristic have specific relevance to this policy?	If No – Please state why:	What do you know about usage of the services affected by this policy by people in this protected group, about their experiences of it, and about any current barriers to access?	Could people in this protected group be disproportionately advantaged or disadvantaged by the policy?	Could the policy affect the ability of people in this protected group participate in public life? (e.g. by affecting their ability to go to meetings, take up public appointments etc.)	Could the policy affect public attitudes towards people in this protected group? (e.g. by increasing or reducing their presence in the community)	Could the policy, change make it more or less likely that people in this protected group will be at risk of harassment or victimisation?	If there are risks that people in this protected group could be disproportionately disadvantaged by the policy are there reasonable steps or adjustments that could be taken to reduce these risks?	Are there opportunities to create positive impacts for people in this protected group linked to this policy?
Gender Reassignment *Note: The Act provides protection for trans people. A trans person is someone who proposes to, starts or has completed a process to change their gender.*	No								
Pregnancy and Maternity *Note: the law covers people who are pregnant or those who have given birth within the last 26 weeks, and those who are breast feeding.*	No								

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Protected Characteristic	Does this characteristic have specific relevance to this policy?	If No – Please state why:	If Yes – What do you know about usage of the services affected by this policy by people in this protected group, about their experiences of it, and about any current barriers to access?	Could people in this protected group be disproportionately advantaged or disadvantaged by the policy?	Could the policy affect the ability of people in this protected group participate in public life? (e.g. by affecting their ability to go to meetings, take up public appointments etc.)	Could the policy affect public attitudes towards people in this protected group? (e.g. by increasing or reducing their presence in the community)	Could the policy, change make it more or less likely that people in this protected group will be at risk of harassment or victimisation?	If there are risks that people in this protected group could be disproportionately disadvantaged by the policy are there reasonable steps or adjustments that could be taken to reduce these risks?	Are there opportunities to create positive impacts for people in this protected group linked to this policy?
Marriage and Civil Partnership *Note: This applies to changes, decisions or proposals impacting on employees only. The Act protects employees who are married or in a civil partnership.*	No								

	Could the policy impact on human rights? (e.g. the right to life, the right to respect for private and family life, the right to a fair hearing)
Human Rights	No specific impacts identified

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PART 3 - Course of Action

Based on a consideration of all the potential impacts, tick one of the following as an overall summary of the outcome of this assessment:

☒	The equality analysis has not identified any potential for discrimination or adverse impact and all opportunities to promote equality have been taken.
☐	The equality analysis has identified risks to equality which will not be eliminated, and/or opportunities to promote better equality which will not be taken. Acceptance of these is reasonable and proportionate, given the objectives of the policy and its overall financial and policy context.