

Environmental Policy

NHS Devon

Version	3
Policy Sponsor	Chief Finance Officer
Policy Lead	ICS Director of Estates
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01/12/2019	Policy Amendment	V2.1	Reviewed by Board Secretary
January 2020	Policy Amendment	V2.1	Reviewed and approved by Executive Team Approved by Governing Body
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July 2025	Policy Amendment	V2.3	Reviewed and updated on NHS Devon template
July 2025	Policy Amendment	V2.4	Reviewed with ICS Director of Estates

Equality, diversity and inclusion statement

NHS Devon is committed to the promotion of equal opportunities, addressing health inequalities and fostering of good relations between people protected under the terms of the Equality Act 2010, the Health and Social Care Act 2012 and Human Rights legislation. We are equally committed to the elimination of unlawful discrimination, harassment and victimisation. To demonstrate this commitment, we develop, promote and maintain policies, strategies and operating procedures. Every effort is made to ensure that patients, employees, contractors or visitors do not experience discrimination; either directly or indirectly, because of their vulnerability; disadvantage; age; disability; gender reassignment; marriage and civil partnership; pregnancy and maternity; race; religion and belief; sex (gender) or sexual orientation.

All staff must comply with this policy. Compliance must reflect our organisational commitment to and policy on, equality, diversity and inclusion. In addition, each

manager and member of staff involved in implementing this policy must give due regard to the needs of those protected under law.

If you, or any other groups, believe you are discriminated against under the terms of the Equality Act, the Health and Social Care Act 2012 or Human Rights legislation by anything contained in this document; or you need this document in an alternative format, for example, large print, Braille, Easy read or other languages; please contact our Patient Advice and Complaints Team (PACT):

Tel: 0300 123 1672

Email: d-icb.patientexperience@nhs.net

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1. Introduction

- 1.1 NHS Devon recognises that in commissioning healthcare services, its activities may impact on the environment, and it is essential that where possible these impacts are minimised. NHS Devon recognises that we should lead by example, as such we are committed to reducing the environmental impact of our activities. We expect a commitment to the same principles from our providers and suppliers.

This policy aims to set out our plans and responsibilities for identifying and addressing our environmental impact and provide a policy framework for identifying the activities which affect the environment surrounding us, our environmental objectives and our defined and measurable environmental targets.

This policy sets out our commitment to maintaining and improving the economic and social wellbeing of our staff and the health of the population by contributing towards sustainability throughout the organisation. NHS Devon will do all that is reasonably practicable to ensure that all staff work together to reduce corporate impacts and staff will work with providers, suppliers and the local community positively to enable NHS Devon to comply with statutory regulations and other guidance relating to energy, the environment and sustainability. (*Appendix 2– Register of Legal Requirements*).

We should be prepared to lead by example in promoting a sensitive, considered attitude to the environment. Good practice in environmental management makes sound business sense.

A key element of our environmental policy is embedding a strong environmental and sustainability culture throughout NHS Devon. All employees, contractors, sub-contractors and anyone working for NHS Devon in an unpaid or temporary capacity are included within the scope of this policy.

When considering environmental and sustainability issues we will be mindful of any differential impact there may be on people with a protected characteristic, as defined by the Equality Act 2010.

The ICS Director of Estates is the environmental champion responsible for implementing this policy within NHS Devon.

2. Purpose and objectives

- 2.1 In October 2020, the NHS became the first national health system to commit to net zero emissions, with the publication of **Delivering a Net Zero National Health Service report** which has been issued as statutory guidance. The

NHS also became the first health system to embed net zero into legislation, through the Health and Care Act 2022. The NHS has committed to a 2040 net zero target for the NHS's carbon footprint (for emissions that are directly controlled by the NHS), and a 2045 net zero target for the NHS carbon footprint 'plus' (for the broader emissions that the NHS can influence). The overall aim of this policy is to set out how NHS Devon will manage and reduce our environmental impact in accordance with the mandatory **NHS England's Green Plan guidance** issued on 4th February 2025 and to achieve the following aims:

- To provide a framework for maintaining and improving the economic and social wellbeing of all our staff and contributing towards a sustainable and high-quality working environment
- To pursue and encourage environmental sustainability by:
- Working in partnership with employees, suppliers and customers to encourage their active involvement in environmental issues and in promoting environmental sustainability.
- Regularly assessing the environmental impact resulting from business operations and remaining fully informed of recognised best practices.
- To achieve good environmental standards in all activities including:
- The reduction, re-use, recycling and disposal of waste.
- Making economic use of energy, water and transport to minimise waste
- To meet our legal obligations
- By only making fully electric vehicles available via the staff salary sacrifice scheme
- Incentivising and encouraging cycling to work
- Ensuring teams where possible have the ability to work in a hybrid way which reduces emissions from travel and office usage

The Environmental Policy and supporting plans have been communicated to all employees and will be communicated to all suppliers and will be available on our website and available to customers, the public and other stakeholders to view.

The performance of the Environmental Policy will be reported on a regular basis to our Audit and Risk Committee which in turn reports to NHS Devon's Governing Body. In this way the organisation will demonstrate that it is doing what is reasonably practicable to manage environmental issues, discharge its statutory duties and meet its corporate objectives.

The appropriateness of the Environmental Policy will be continually reviewed in the light of both legal and national requirements and the requirements of the organisation.

- 2.2 NHS Devon is committed to embedding sustainability into behaviours by staff and other partners by encouraging increased awareness and promoting behavioural change. By, concentrating on reduction of paper, increased recycling, sustainable travel and energy and carbon reduction.

NHS Devon has set the following objectives:

- Reduce the negative environmental impact of the organisation
- Increase staff and community awareness to enable them to reduce, reuse, recycle both at work and home
- Ensure our role as commissioners encompasses the principles of environmental awareness and compliance

3. Scope

3.1 This section contains the detail on what we are going to do in practice to achieve the objectives set out in our Environmental Policy.

We accept that not only do we have a responsibility to identify the aspects which affect the environment but also to comply with all applicable environmental laws and other requirements. (*Appendix 2 – Register of Legal Requirements*).

Understanding the environmental aspect and impact of NHS Devon is key to the successful implementation of our environmental policy

Three key areas for office-based services to take account of are:

- Minimising waste
- Recycling
- Energy consumption

An Environmental Action Plan has been produced following completion of the following steps:

1. Identification of the activities e.g. travel, purchasing, office working including use of technology
2. The identification of issues which affect the environment (ASPECTS) e.g. incorrect or inefficient disposal of waste/surplus items, inefficient use of fuel, unnecessary purchases, unnecessary facilities costs,
3. The identification of the effects they have on the environment (IMPACTS) e.g. Air pollution, unnecessary use of landfill, depletion of natural resources, inefficient use of space
4. Assessing for 'significance' within our work environment i.e. their potential impact on the environment
5. Changing of attitudes towards the environmental issues by tackling the three barriers to pro environmental behaviour, individuality, responsibility and practicality. By tackling the three barriers, attitudes will improve, intentions will change and subsequently so will individual behaviours of all with responsibility.

Risk assessments will be conducted to identify sources of potential environmental harm.

Corrective actions identified will be operationally managed by an issue log and if considered significant added to the Corporate Risk Register in line with NHS Devon's Risk Management Framework Policy.

Relevant information will be displayed in appropriate locations within our premises for example, in kitchens.

The priority focus for action by NHS Devon will cover the following areas as detailed in our action plan appendix 3:

- Workforce and Leadership
- Digital Transformation
- Travel and transport
- Estate and Facilities Management
- Supply chain and Procurement
- Food and nutrition
- Adaptation

NHS Devon has signed up to the Devon Climate Declaration. We are a member of the organisation and activity from our provider Trusts is published on a regular basis <https://www.devonclimateemergency.org.uk/devon-climate-declaration/> detailed in appendix 4.

4. Definitions

Terms	Definition
ICB	Integrated Care Board
Carbon footprint	A carbon footprint is the total amount of greenhouse gases, especially carbon dioxide (CO ₂), that are emitted directly or indirectly by an individual, organization, product, or activity. It is usually measured in units of carbon dioxide equivalents (CO ₂ e) to account for different greenhouse gases.
Net Zero	The NHS Net Zero commitment refers to the National Health Service (NHS) in England's plan to become the world's first net zero national health system. This means reducing greenhouse gas emissions as much as possible and balancing any remaining emissions with actions that remove carbon from the atmosphere.
Climate change	Climate change refers to long-term shifts in temperatures and weather patterns, primarily caused by human activities, especially the burning of fossil fuels like coal, oil, and gas. These activities increase the concentration of greenhouse

gases (like carbon dioxide and methane) in the atmosphere, which trap heat and lead to global warming.

5. Accountabilities, Duties and Responsibilities

This section outlines the organisational responsibilities for environmental management within NHS Devon.

Chief Executive Officer	The Chief Executive Officer has ultimate accountability for the strategic direction and operational management of NHS Devon, including compliance with all legal, statutory and policy requirements. The Accountable Officer has overall responsibility for ensuring that adequate environmental arrangements are in place.
Policy Sponsor	The Policy Sponsor is responsible for: - ensuring that policy is appropriate for consideration for approval; - endorsing this policy ahead of submission for approval; - with the Policy Lead, maintaining and updating procedures/protocols and other supporting documents for this policy;
Policy Lead / Author/ ICS Director of Estates	It is the responsibility of the Policy Lead / author to: - ensure as far as possible that the policy is in line with Department of Health and Social Care guidance, legal requirements and advice from clinical bodies; - to complete a EQIA and Implementation Plan where required - undertake a fair and proportionate consultation period with the relevant stakeholders as part of the document's development - to ensure that the policy is in alignment with NHS Devon's strategy and values - ensure that the policy is developed, approved, disseminated and monitored as set out in the document; with Policy Sponsors, maintaining and updating procedures / protocols and other supporting documents for this policy. The ICS Director of Estates has the delegated responsibility for the implementation of this policy and ensuring the Governing Body is kept fully informed on environmental issues that arise as and when appropriate. This will include: - The development and implementation of an Environmental Action Plan

	▪ Co-ordinating with the executive and senior management to identify issues which affect the environment ▪ Reporting progress against agreed targets and objectives ▪ Working with key staff across the organisation who have lead responsibility on business activities which impact on environmental and sustainability issues across the organisation for example, IT printing and procurement liaison with suppliers
Executive Committee	Executive team have delegated responsibility from the Accountable Officer to ensure this policy and associated procedures, protocols, guidance and management systems are fully understood, applied and resourced within their areas of responsibility. They should also provide leadership by example and proactively promote responsible attitudes towards environmental issues by: • Embedding the environmental and sustainability culture as well as pro environmental behaviour • Implementation of the environmental policy and standards • Regularly assessing the environmental impact resulting from delivering business operations • Raising awareness and promoting active involvement in environmental issues • Achieving good environmental standards in all activities including the reduction, re-use, recycling and disposal of waste. Making economic use of energy, water and transport to minimise waste in all aspects of the business function. Identifying key staff who have lead responsibility on business activities which impact on environmental and sustainability issues across the organisation for example, IT printing and procurement to seek information from relevant suppliers about the environmental effects of products and services that they supply.
ICS Sustainability working group	This group provides a forum for staff and managers to identify how environmental management can be improved and establish monitoring mechanisms. Each directorate will have a champion(s) who will represent their directorate on the environment working group.

Senior Managers	Senior Managers will support the continual improvement of the organisational environmental impact and pursue and encourage environmental sustainability within their area of responsibility.
Line Managers	Line Managers should ensure that all employees who report to them have an awareness of the environmental policy and maintain an awareness of the environmental and sustainability issues within their teams.
All Staff	Employed or engaged staff have a duty to comply with NHS Devon policies and standards as outlined in their contracts of employment and codes of conduct. All employees, contractors, sub-contractors and anyone working for NHS Devon in an unpaid or temporary capacity are included within the scope of this policy and are responsible for: - regularly assessing the environmental impact resulting from their role in delivering business operations - being aware of and adhering to recycling arrangements taking responsibility for their own work area and supporting the reduction of environmentally harmful activities such as travel, use of electricity, document printing, etc

6. Impact Assessments

6.1 An EQIA has been completed, and the following findings have been identified.

- The policy does not discriminate against any protected groups of staff within NHS Devon.
- The policy has a positive impact on all groups of staff within NHS Devon.

7. Implementation

7.1 All staff will be informed of the approval of the Policy via the Staff Bulletin which will provide a link to the document on the NHS Devon Intranet.

7.2 NHS Devon Senior Managers, or their designated representatives, will implement this policy by:

- Notifying all staff of its existence. New staff will be informed of this policy as part of their induction.
- Destroying all superseded paper-based versions of the policy and electronic versions retained in their area.

- Having adequate knowledge of, and / or access to, all relevant legislation in order to ensure that compliance with such legislation is maintained.
- Discussing with staff as part of their regular one-to-ones how they seek to achieve their individual objectives around policy review and maintenance.

8. Approval and Review

- 8.1 The approval route for this policy will be via the Chief Finance Officer and Chief Communications and Corporate Affairs Officer.
- 8.2 This policy will be reviewed annually, or sooner if required, in order to ensure that it is current, relevant and reflects the strategic aims, objectives, organisational structures and responsibilities of NHS Devon.

9. Monitoring compliance and effectiveness

- 9.1 NHS Devon will use Key Performance Indicators (KPIs) to monitor and assess the effectiveness of this Environmental Policy. This will be managed by the ICS Director of Estates reporting to the Executive Committee, Audit and Risk Committee and Governing Body.

NHS Devon will review the 'life cycle' financial costs for example, energy savings, waste management, fuel and travel expenses.

The Environmental Policy will be reviewed, and internal audits scheduled as appropriate and recommendations addressed.

10. References

Other related policy documents

NHS Devon ICB Green Plan
ICS Green Plan

Legislation and statutory requirements

Delivering a Net Zero National Health Service report
Health and Care Act 2022

NHS England's Green Plan guidance issued on 4th February 2025

Task Force on Climate-related Financial Disclosure (TCFD)

<https://www.gov.uk/government/publications/tcf-aligned-disclosure-application-guidance#:~:text=Since%20their%20inception%2C%20the%20TCFD,entities%20in%20the%20private%20sector%20.>

Appendix 1 - Legal Requirements

NHS Devon accepts that not only does it have a responsibility to identify its environmental aspects, it also is required to comply with all applicable environmental legislation.

Environmental Legislation	Duty Imposed
Environmental	
Environmental Civil Sanctions (England) Order 2010	Supplement existing enforcement powers of the Environment Agency.
Environmental Protection Act 1990 (the overarching / umbrella act for environmental laws and regulations) Environment Act 1995 (enforcement, Environment Agency, functions, duties and powers)	The legislation covers a wide range of subjects, many of which are covered by supplementary legislation, with the main areas being: • Maintenance of premises • Control over disposal of wastes • Smoke, fumes or gasses emitted • Dust, steam, smell or other effluvia • Accumulation or deposit • Noise for premises • Noise caused by a vehicle, machinery, or equipment in a street
Environmental Protection (Duty of Care) Regulations 1991, SI 2839 Environmental Protection (Duty of Care) (England) (Amendment) Regulations 2003, SI 63	
The Air Quality (England) Regulations 2000	The regulations impose a duty to ensure that pollutants do not enter the air.
Waste - General	
Controlled Waste Regulations 1992, SI 588 Controlled Waste (Amendment) Regulations 1993, SI 566	The Regulations define controlled waste for the purposes of the Environmental Protection Act Part 2, which introduced three categories of controlled waste: household; industrial; and commercial.
Waste Management Regulations 1996, SI 634	The legislation controls the declaration, classification, controls and disposal of waste, general waste and electronic equipment.
Waste (England and Wales) Regulation 2011 (as amended)	Imposes duties regarding the improvement and use of waste as a resource.
Controlled Waste regulations England and Wales 2012.	Classifies waste as household waste or industrial waste for the purposes of part two of the Environmental Act 1990.
Landfill (England and Wales) Regulations 2002, SI 1559	Mainly applies to landfill sites. Imposes restrictions on the type of waste that can be disposed of at landfill sites. The sites must be registered and

	accept only certain types of waste to avoid additional contamination.
The Control of Pollution (Oil Storage) (England) Regulations 2001 (SI 2001/2954)	To adequately control oil storage
Electrical and Batteries	
WEEE Regulations 2013	Dispose of electronic and electrical equipment containing certain substances by a licensed waste contractor taking account of recovery and recycling opportunities
The Waste Batteries and Accumulators Regulations 2009	The regulations affect any business that uses produces, supplies, or disposes of batteries, as well as any business that manufactures or designs battery-powered products. Business users will be: • encouraged to separate their waste batteries to help treatment and recycling • informed about collection and recycling schemes available.
Water	
Water Industry Act 1991	Part 3 of the act deals with water supply and requires occupants of a premises to ensure that their fittings do not allow the mains water to be contaminated or wasted. Part 4 prohibits deals with sewerage services and standards for connection. Prohibits the disposal of dangerous substances or anything that may interfere with the free flow of treatment. Part 5 of the act deals with trade effluent.
Water Industry Act 1999	It is an offence for an owner or occupier of premises, either through intent or negligence, to allow a water supply fitting to be in a state of disrepair so as to cause the wasting, misuse or contamination of water. All those who use a supply of water must ensure that water is not wasted and that internal fittings are in a good state of repair
The Water Supply (Water Fittings) Regulations 1999	Set legal requirements for the design, installation, operation and maintenance of plumbing systems, water fittings and water-using appliances.
The Groundwater (England and Wales) Regulations 2009	To regulate trade effluent discharges to public sewers
Water Resources Act 1991 (Amendment) (England and Wales) Regulations 2009 SI 3104	Not neither to contaminate surface or foul drain water nor to wilfully waste water resources.

Appendix 2 - NHS Devon Environmental Policy Action Plan

NHS Devon will:

	Action	How it will be measured
Workforce and leadership	By December 2025, identify a NHS Devon board level lead for sustainability (this has been delayed due to the recent government announcements for ICBs).	Identified lead name following 2025 ICB reorganisation.
	By July 2025, Carbon Literacy for Healthcare course NHS Devon to be implemented.	Course enrolment numbers and completion rates for Trust members.
	By April 2026, review induction training for new starters to include how we are meeting the green agenda and overview of the NHS Devon Green Plan.	Review completion rates.
	By December 2025, encourage staff to provide suggestions and ideas on how sustainability can be improved in all areas across the organisations	Monitor response rate
Digital transformation	By April 2026, increase flexibility to allow for staff to work remotely where feasible.	Calculate the CO2 emissions avoided by working from home.
		Measures the percentage of employees opting for sustainable travel options when commuting is necessary.
	By December 2025, reduce wastage printing through awareness and practice such as e-signatures and digital sharing	Tracks the proportion of printing completed on recycled paper.
Travel and transport	Continue to offer a system wide Cycle to	Track uptake of scheme

	Work Scheme is available for all staff.	
	Continue to offer the lease car schemes	Track uptake of scheme
	By April 2026, explore the potential for subsidised public transport usage for staff	Track uptake of scheme
	Continue to promote home working (where possible balancing needs of the business and our way of working) to reduce the carbon footprint caused by travel.	Monitor office usage
Estates and facilities	By April 2026, review recycling facilities across NHS Devon offices.	Audit of waste activity across the system
	By December 2025, explore alternative greener energy suppliers for our sites through our landlord	Influence through the Aperture tenant forum to ensure all tenants agree to the utility procurement strategy to incorporate green supplied energy
Supply chain and procurement	By September 2025, NHS Devon should only be purchasing 100% recycled paper and be reducing paper usage.	Ensure building coordinator only procures 100% recycled printing paper
	Take action to address single use plastics and specifically eliminate unnecessary catering plastics.	All catering items are now professional catering equipment as of December 2023.
Food and nutrition	Where possible, buy locally sourced products promoting the concept of the Devon Pound.	Where a local supplying catering model permits

Appendix 3 - Devon Climate Declaration

The Declaration (<https://www.devonclimateemergency.org.uk/devon-climate-declaration/>)

1. This Declaration has been prepared by a consortium of public, private and voluntary organisations collaborating through a Devon Climate Emergency Response Group. It sets out an ambition to tackle climate change that covers all of Devon, including those people who live, work in and visit our county, and those businesses who are based or operate here.
- 2 We are aware of the significant implications of climate change for Devon's communities; it is already affecting our environment, infrastructure, economy and health & wellbeing. If not addressed, the impact on future generations will be profound and the ability to meet the United Nation's Sustainable Development Goals will be severely compromised.
- 3 We understand that the Intergovernmental Panel on Climate Change (IPCC) has advised that carbon emissions must reduce globally by at least 45% by 2030 from 2010 levels and reach net-zero by 2050 if we are to avoid the worst effects of climate change by keeping warming below 1.5 degrees.
4. We will lead in the global response to climate change through our collective action, innovation and influence.
5. Individually, we will review (within 6 months) our plans to reduce our organisation's carbon emissions to meet or exceed these targets, including ensuring the people we do business with are doing the same. We will publicly report our carbon emissions annually in accessible formats.
6. In collaboration, we will engage Devon's residents, businesses and visitors to develop and implement a plan to facilitate the reduction of Devon's production and consumption emissions to meet IPCC recommendations at the latest. We will openly report progress on its delivery. We know this transformational change will be challenging and will include:
 - Deploying more renewable, decentralised and smart energy systems
 - Retrofitting energy-efficiency measures into our existing buildings
 - Constructing zero-carbon new buildings
 - Travelling less and using improved walking, cycling and public transport infrastructure more often, and using electric and hydrogen vehicles
 - Changing our consumption to use less, re-use more and choose low-carbon options
 - Challenging all economic sectors to review their practices and the values of those they do business with
 - Divesting from fossil fuels
 - Changing our dietary patterns and reducing food waste

- Changing agricultural practices to reduce emissions associated with farming operations, manage soils sustainably and replenish soil carbon
 - Encouraging carbon storage such as through tree planting, the use of wood in construction and peatland restoration
 - Empowering the people of Devon with the knowledge and skills to act collectively.
7. Additionally, we will work to understand the near-term and future risks of climate change for Devon to plan for how our infrastructure, public services and communities will have to adapt for a 1.5-degree warmer world.
 8. Local organisations and communities cannot do this alone as the national government plays a key role in many of the policy areas that are vital to reducing emissions and adapting to climate change. We call on the government to prioritise decarbonisation and adaptation within decision making and work with us by using its powers to provide the resources and funding necessary to accelerate the transition to a low-carbon and resilient economy and society.
 9. We challenge every organisation, business, community and individual to do the same.