

Changes in this version, if updated from current version

N/A

Position Statement / Belief / Vision

NHSBT is an ethically responsible organisation, therefore, we are committed to sustainable development and preservation of the environment, as identified within our Carbon NET Zero 2040 strategic objective.

“NHSBT will make all reasonable efforts to ensure that its operations do not have an adverse effect on the environment and human health. By doing this that we can ensure the organisation is able to meet its core purpose, now and in the future.”

In order to realise this commitment NHSBT will pursue the following principles:

1. We are committed to preventing pollution and the efficient use of materials, whilst conserving energy at all stages of our product life cycles.
2. We will make every effort to enable the safe management of any waste produced, at the most ethical point in the waste hierarchy.
3. We understand that we have an integral part to play in the protection of health and the environment and ensuring a sustainable future. We will promote a culture where all employees of NHSBT play their part in realising the environmental and sustainability aims of NHSBT.
4. We recognise our influence within the local environment and will engage with relevant stakeholders to meet our environmental and sustainability aims and objectives.

This will be done by:

- Ensuring we comply with all applicable legislation and any other requirements we are subject to.
- Implementing NHSBT's corporate objective, to be NET Zero 2040, via a detailed road map, to reduce any negative impact NHSBT's operations have on the environment and human health.
- Operating a NHSBT-wide environmental management system. This will provide staff and others with instructions and guidance on how NHSBT minimises the impact on its environment. The system will also drive continual improvement in relation to environmental performance and wider operational processes.
- Training and coaching of staff, and others where appropriate, to ensure they understand how they play their part.
- Communicating and consulting with staff and other stakeholders on relevant internal and external environmental issues and reporting progress against our objectives and performance.

What legislation/regulation/standard are we seeking to comply with?

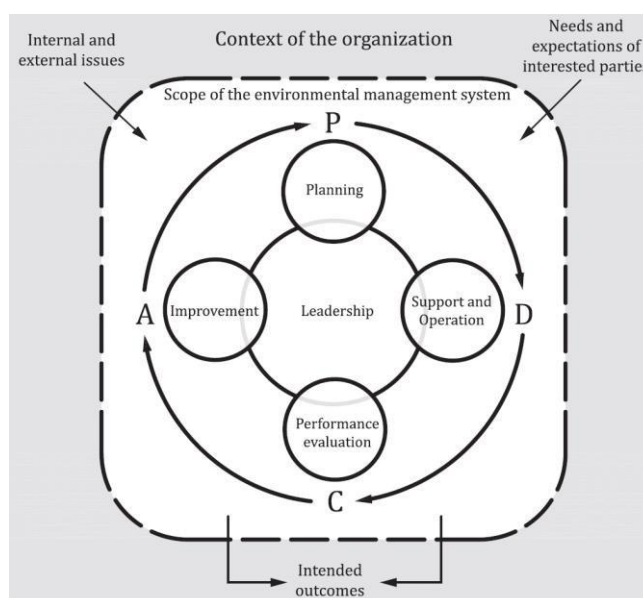
All Legal and other Compliance Requirements to which NHSBT is required or has chosen to comply with are listed within NHSBT's Compliance Obligation Register. (DAT2821).

This policy will also support the reporting process, under HM Treasury's Task Force on Climate-related Financial Disclosure (TCFD) regime.

How will this be achieved?

NHSBT operates an Environmental Management System (EMS) that meets the requirements of ISO14001:2015. This is the model that drives delivery of this policy.

The structure of the Environmental Management System is set out below:

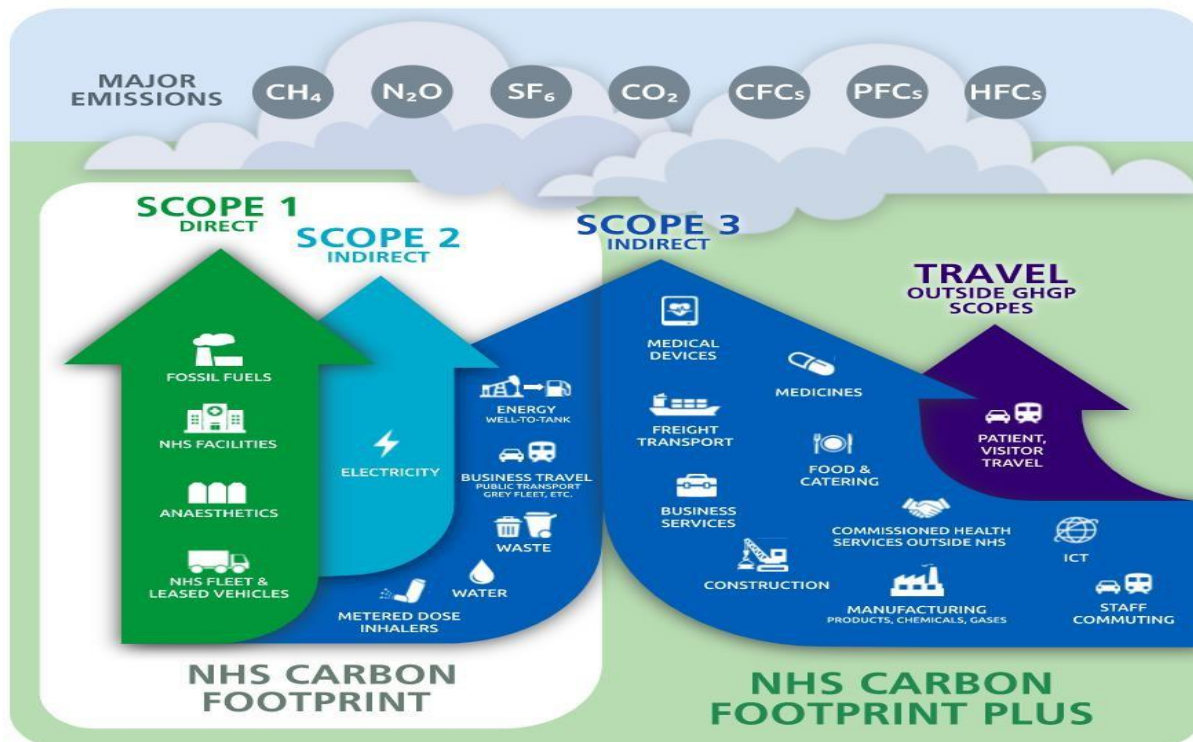


1.0 Scope

NHS Blood and Transplant's EMS covers all sites and areas of activity within the organisation, as well as our influence upon our supply chain. The aim of the EMS is to provide a framework for continual improvement to contribute to sustainable development by:

- Enhancing our environmental performance by preventing pollution and protecting the environment.
- Demonstrating the organisation's commitment to satisfying all compliance obligations.
- Achievement of NHSBT's sustainability and environmental objectives, as defined by the Net Zero 2022 strategic objective and supporting strategic plans.

The coverage of the policy is demonstrated by the infographic below, with Scope 1, 2 and 3 all covered by the policy.



2.0 Leadership

The Net zero 2040 strategic objective is owned by NHSBT's Board, with the Chief Financial Officer having Board level responsibility. This continuation of top-level leadership has proven to deliver significant results in sustainability, within the business, since 2010 and will build on the high level of success and progress previously made.

The current strategy will further imbed sustainability into the organisational culture, whilst instilling a mindset and determination to improve the business and challenge current ways of working.

To ensure good governance of the strategic aims and to enshrine continual improvement into the system, we will convene a Net Zero Group, which will meet regularly to ensure plans are in place to meet our objectives are monitored and reported through to the Board.

NHSBT Senior Management defines the organisations environmental policy and ensures that is implemented, in order to achieve the aims of this policy NHSBT will:

- Ensure consistency by operating within the NHSBT Quality Assurance system.
- Commit to ensuring protection of the environment by complying with relevant legislation, best practice, being vigilant and reporting and learning from errors and incidents.
- Maintain an appropriately qualified and balanced workforce through recruitment, appraisal and planned development fit to deliver the service.
- Uphold our professional values and maintain a commitment to good professional practice and conduct.
- Set clear objectives and plans to implement this policy and ensure all our staff are familiar with them.
- Commits the organisation to continually improve the system to drive improved performance.

In defining the policy Senior Management will ensure that the content links to NHSBT organisation specific risks as well as all relevant compliance requirements, as identified in NHSBT's Compliance Obligation Register (DAT2821).

3.0 Risk Management and Planning

Planning activities will be undertaken, using a risk-based approach, with significant risks being identified and operational plans developed and put in place to control those significant risks and support NHSBT's overall strategic objectives.

The Risk Management and Planning process follows the following steps:

1. Identification and assessment of environmental risks and opportunities falling out of NHSBT's operations. Managers will identify areas that require environmental risk assessment as well as ensuring controls within all assessments applicable to their area of control are in place. The process for completing this is described in MPD1336.
2. Identification and assessment of NHSBT's internal and external Issues as well as the needs and expectations of interested parties. This work is co-ordinated by the Environmental and Net Zero Team. Any significant risks from this area will be added to NHSBT's Compliance Obligation Register. (DAT2821).
3. Identification of all Legal and Other Compliance Requirements to which NHSBT is required, or has chosen, to comply with. The process for conducting the updates to NHSBT's Compliance Obligation Register (DAT2821) is described in SOP5053. The outcome of identification will be recorded in DAT2821.
4. NHSBT has defined its environment objectives up to 2040, within the 2040 Net Zero strategic objective. Planning activity is undertaken by specified Assistant Directors with the assistance of the Sustainability Team. Performance to plans is reviewed quarterly by the Net Zero Group. The Board receives and publishes an Annual Report, which includes Environmental and Sustainability performance reporting.

4.0 Support

NHSBT's Executive Team will ensure that resources are available to support the aims and objectives of Net Zero 2040.

NHSBT will ensure that the following groups are and remain competent, in terms of environmental risk management:

- ~~Employees – All staff are required to complete the essential Environmental Awareness training module. This training is held on NHSBT training systems and is monitored, and compliance reported on a regular basis. In addition to this, staff who require role specific training are identified and trained as required.~~ Employees – complete the essential Environmental Awareness training module. This training is held on NHSBT training systems and is monitored, and compliance reported on a regular basis. In addition to this, staff who require role-specific training are identified and trained as required.
- Contractors – NHSBT will only engage competent contractors. All contractors and their employees (who will work within NHSBT premises) must be made aware of this policy and any significant environment aspects associated with their work. Prior to commencing work

NHSBT's Estates and Facilities Department must approve the contractors Risk Assessments and Method Statements to ensure that the contractors work will support the environmental management system. The process for controlling contractors is defined within MPD1170. Prior to been allowed entry to NHSBT premises all contractors must be inducted to site, which will include conformance to NHSBT's environmental requirements.

5.0 Operation

The organisation will operate control over its activities in all circumstances (Normal and Emergency). This will be achieved by the following:

- For all significant environmental risks and opportunities, identified through the risk assessment process, operational areas must devise and implement actions/plans to control the risk. The actions/plans will be regularly reviewed for effectiveness through Internal Audit.
- Directorates/Departments must have plans in place to meet the requirements imposed upon them by Net Zero 2040. The plans will be regularly reviewed by the Net Zero Group.

6.0 Performance Evaluation

NHSBT has in place systems and procedures to ensure that it can monitor its environmental performance and deal with any nonconformity and put in place corrective action. (SOP3406 & SOP5039)

NHSBT has in place procedures to ensure that it adheres with all compliance requirements to which it is required or subscribes to. The Environmental Team conducts an annual audit of all main centres to gain assurance that we remain compliant.

Projects that have may have a significant impact upon the environment are identified via NHSBT's change management process and utilise MPD1.

The organisation will control all records required for the operation of the environmental management system via the Quality Management System. (QMS)

Senior Management will ensure that internal audits of NHSBT's EMS are conducted at regular intervals and the findings recorded, with suitable corrective actions agreed. Audits will be carried out in accordance with the requirements of MPD1243 and any corrective actions will be recorded, communicated and actioned via NHSBT's QMS.

NHSBT has in place dedicated structures which allow cross-directorate, senior management and Board level review, and oversight of all elements of the environmental management system.

A formal review of the EMS will be conducted every 6 months within the Net Zero Group meeting. Reviews will be conducted in line with MPD76.

7.0 Continual Improvement

The core purpose, of the environmental management system that NHSBT operates, is to drive continual improvement and reduction of wastes within the organisation. The monitoring of the effectiveness of any improvements is a function of the senior management review structure.

What part do we need others to play?

The Chief Executive

The Chief Executive of NHSBT has the overall responsibility to NHSBT Board for the effective implementation of environmental legislation.

Responsibilities include:

- Approving the environment and sustainability policy and strategic objectives, in conjunction with the Chair of the Board.
- Allocation of adequate resources for sustainability and environmental management.
- Ensuring that sustainability and environmental matters are effectively managed.
- Ensuring that sustainability and environmental matters management performance is measured.
- Ensuring that all staff, including the Chief Executive, are competent.

The Executive Directors

The Chief Executive delegates operational aspects of environmental management to the Executive Directors.

Responsibilities include:

- Planning the effective implementation of environmental management policies.
- Ensuring that sustainability and environmental management objectives are an integral part of the organisation's business plan.
- Ensuring that managers and staff are competent to fulfil their duties under this policy and subordinate processes.
- Ensuring that managers' responsibilities for sustainability and environmental management are defined in their job descriptions.
- Ensuring that sustainability and environmental management performance is included in managers appraisals and objectives.
- To co-operate and co-ordinate with NHSBT's external stakeholders to ensure that sustainability and environmental management is effectively planned and managed.

The Chief Financial Officer is also responsible for:

- ensuring that there is an effective Environmental Management System (EMS) within NHSBT.
- providing a professional and competent environmental advisory service within NHSBT.
- chairing the Net Zero Group (NZG) and ensuring that the NHSBT Board is briefed on performance, in relation to the Net zero 2040 strategic objective.

Senior Managers

Senior Managers will ensure:

- Strategic sustainability/environmental management plans are implemented through functional plans where necessary.

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- Allocation of adequate resources for sustainability and environmental management within their areas.
 - That sustainability and environmental management feedback is appropriately reviewed, and action taken where necessary.

Managers

Managers will ensure that arrangements for sustainability and environmental management are implemented and are continuously under review, and that responsibility for sustainability and environmental management is effectively delegated to those reporting to them for example, supervisors and staff.

Responsibilities include:

- To effectively implement the directorates, or functions, sustainability/environmental management plan.
- Ensuring that environmental impact assessments are carried out and recorded.
- Ensuring that employees understand their sustainability/environmental responsibilities.
- Assessing the need for sustainability/environmental management training and ensuring that it is delivered.
- Ensuring that all documentation (such as environmental risk assessments, procedures, and training records) is available.
- Investigating, reporting, and recording environmental incidents.
- Ensure that sustainability and environmental issues are a normal part of operational communications and that their staff contribute to ensuring that the appropriate levels of compliance are maintained at all times.
- Provision of prompt feedback to senior management of:
 - Performance including successes and failures.
 - Identified deficiencies in sustainability/environmental management plans, policies, standards, procedures, and systems.

All employees

All employees have a responsibility to assist NHSBT in managing its environmental responsibilities.

Responsibilities include:

- To co-operate with the employer and others to improve sustainability and environmental performance.
- To report incidents that may adversely affect the environment, or that will negatively impact on NHSBT's sustainability goals, to their manager.

Head of Estates Transformation and Sustainability

The Head of Estates Transformation and Sustainability is responsible for oversight of the Environment and Sustainability Team. This includes:

- Allocation of resources to the Sustainability Team.
- Monitoring performance against strategic objectives.
- Reporting performance of the EMS into the Estates and Facilities Senior Management Team.
- Co-ordination of Environment and Sustainability activities with national HoC Group.

The Environmental Manager

The Environmental Manager is responsible for ensuring the provision of professional and competent sustainability and environmental management advice. As such Environmental Manager supports Policy Makers, Implementers and Staff as identified in the above flowchart.

Responsibilities include:

- Developing and maintaining NHSBT's environmental management system.
- Development and monitoring performance to NHSBT wide strategies.
- Developing environmental policies and procedures.
- Ensuring effective communication of environmental and sustainability activities via appropriate communication medium.
- Support for the environment and sustainability planning process within the Directorates and Senior Management Teams, including suggesting objectives and priorities based on the current strategic plan for environmental management. This includes maintaining a master plan of projects that will contribute to achieving strategic aims.
- Support for managers in the identification of hazard, the assessment of the level of risk and the identification and implementation of appropriate risk control measures.
- Attending the Net Zero Group (NZG), to provide professional sustainability advice
- Providing methods and procedures to assess risk.
- Producing training, for example environmental management training for managers and environmental impact assessment.
- Collation of environmental incident information and investigation procedures, including liaising with enforcing authorities as appropriate.
- The maintenance of information systems covering relevant compliance obligations and environmental management practices.
- Authorising updates to NHSBT's compliance register.
- The establishment and maintenance of professional relationships with Enforcing Authorities including the Environment Agency (EA).
- Developing and overseeing auditing arrangements and establishment of active and reactive monitoring systems.
- Ensuring that any relevant environmental risks are included in the Corporate Risk Reporting process.

Deputy Environment Manager

- all Environmental Manager responsibilities, in their absence.
- at the direction of the Environmental Manager, providing support for the environment and sustainability planning process within Directorates.
- advising sustainability working groups and project teams, within NHSBT, on matters relating to Net Zero and environmental management.
- supporting construction projects to ensure compliance with BREEAM requirements.
- day to day management of the Sustainability Team.

Environmental Advisor

- monitoring operational compliance to NHSBT's environmental management system.
- provision of environmental management advice.
- assisting operational managers with the assessment of environmental risk.
- delivering training and coaching of staff in sustainability/environmental matters.
- investigation of environmental incidents, including assisting managers in identifying root cause and determining controls.

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- reviewing external sources of information in order to determine the applicability of compliance obligations upon NHSBT and highlighting updates to the Sustainability Team.
 - liaising with external enforcement bodies.
 - implementing the organisations environmental audit plan, by conducting internal audits.
 - escalating any nationally applicable non-conformity or significant risks to the Environmental Manager for review.

How we will measure success/monitor/evidence our progress

A formal review will be conducted every 6 months within the Net Zero Group (NZG) meeting.

Signature of Accountable Executive

Carl Vincent
Chief Financial Officer

Date