



GIG
CYMRU
NHS
WALES

Bwrdd Iechyd Prifysgol
Cwm Taf Morgannwg
University Health Board

Reference Number: TBC
Version Number: 3
Next Review date: TBC

Environmental Policy

Introduction

This Policy has been endorsed by top management (Chief Executive and Executive Board) and outlines the guiding principles of the Environmental Management System that shall encompass all of the activities, products and services undertaken by Cwm Taf Morgannwg University Health Board (CTMUHB). It confirms that the Environmental Management System shall meet the requirements of the ISO 14001:2015 environmental standard and applies to all Health Board premises and leased premises. It includes a commitment by the Health Board to the protection of the environment, including prevention of pollution, sustainable resource use, climate change mitigation and adaptation, protection of biodiversity and ecosystems, fulfilling compliance obligations, providing a framework for setting and reviewing environmental objectives and targets, and continuing to develop its Environmental Management System to enhance environmental performance.

Objectives

- Ensure that all employees, including staff from other NHS Wales organisations and contractors, are responsible for working in a manner that protects the environment;
- Integrate environmental management into operating procedures to ensure that long term and short term environmental issues are considered;
- Protect the environment by preventing pollution and committing to sustainable resource use, climate change mitigation and adaptation, and protection of biodiversity and ecosystems;
- Ensure compliance with all relevant environmental legislation, obligations, Healthcare Standards for Wales and Welsh Government Directives.
- Audit the ISO 14001 Environmental Management System on a regular basis to identify strengths and areas for improvement, and to highlight actions to prevent deficiencies;
- Review the Environmental Policy regularly to ensure that it is maintained as documented information, is communicated within the organisation and is available to all interested parties;
- Remain committed to continual improvement.

Operational Date - TBC

Expiry Date – TBC

Formal – three years

Informal – one year

Scope - Applies to all staff from NHS Wales on all UHB locations.

Equality Impact Assessment

Completed 19/11/2019.

Distribution

All staff via internet and team briefings.

To be read by	Executive Directors, Directorate Managers and Heads of Nursing, Managers, Contractors, All employees / staff that undertake activities that impact on the environment.
Documents to read alongside this Policy	<ul style="list-style-type: none"> • CTMUHB Energy Policy • CTMUHB Waste Policy • CTMUHB Waste Segregation Procedure • CTMUHB Sustainable Procurement Policy • CTMUHB Transport and Travel Policy • CTMUHB Traffic and Car Parking Management Procedure • CTMUHB Biodiversity & Ecosystem Resilience Plan • CTMUHB Flexible Working Policy • CTMUHB Business Continuity Policy • CTMUHB Incident Reporting Policy • CTMUHB Fire Policy • CTMUHB Asbestos Management Plan • CTMUHB Water Safety Plan • CTMUHB Code of Conduct and Safety Rules for Contractors • CTMUHB Control of Operational Maintenance Contractors Policy
Approved by	<ul style="list-style-type: none"> • Environmental Management Steering Group • Quality & Safety Committee
Accountable Executive / Lead Director (responsible for formal review every three years)	Director of PCMH CSO-Facilities Assistant Director of Facilities
Author / Management Lead (carries out informal review annually)	CSO-Facilities Governance & Compliance Manager, CSO-Facilities Technical & Environmental Compliance Manager
Freedom of Information Status	Open
<p>If the review date of this policy has passed, please ensure that the version you are using is the most up to date either by contacting the document author or the Corporate Services Department.</p> <p>To avoid use of out of date policies please do not print and then store hard copy of this document.</p> <p>Out of date policies cannot be relied upon.</p>	

Amendment Record

If a change has been made to the document, the changes must be noted and circulated to the appropriate colleagues.

Detail of change	Why change made?	Page number	Date of change	Version	Name of Policy Author
<p>Various updates of policy narrative as part of formal review and in line with new CTMUHB Policy Template. These include:</p> <ul style="list-style-type: none"> • Update of Policy Statement (Section 2). • Update of Policy Scope (Section 4). • Update of Applicable Legislation (Section 5). • Update of Training and Competence Implications (Section 7). • Appendices to cover Equality Impact Assessment, Training Impact Assessment, Health Impact Assessment, Privacy Impact Assessment Screening and One Page Description of Policy. • To encompass the staff and properties within the extend boundary i.e. Bridgend staff and properties. 	<p>Formal review of policy.</p>	<p>Through out</p>	<p>July 2020</p>	<p>3</p>	<p>Facilities Governance & Compliance Manager, Technical & Environmental Compliance Manager</p>

	Environmental Policy	Page
1	Purpose	5
2	Policy Statement	6
3	Principles	7
4	Scope	8
	4.1 Definitions	8
	4.2 Scope Specification	9
5	Legislative and NHS Requirements	9
	5.1 Legislative Requirements	9
	5.2 NHS Requirements	9
	5.2.1 Freedom of Information Act 2000	9
	5.2.2 Equality Impact Assessment (EqIA)	10
	5.2.3 Health Impact Assessment (HIA)	10
	5.2.4 Privacy Impact Assessment (PIA)	10
6	Procedure	10
7	Training Implications	12
	7.1 Induction	12
	7.2 Continued Training	12
	7.3 Specialist Training	12
8	Review, Monitoring and Audit Arrangements	12
	8.1 Summary of approval process	12
	8.2 Operational date	12
	8.3 Review of policies and procedures	12
	8.4 Audit	13
9	Managerial Responsibilities	13
	9.1 Responsibilities	13
	9.2 Consultation process	15
	9.3 Publication and dissemination of policy	15
10	Retention / Archiving	16
11	Non Conformance	16
12	Equality Impact Assessment Statement	16
13	Privacy Impact Assessment Statement	16
14	References	17
15	Appendices	20
	• Appendix 1 - CTMUHB Environmental Policy Statement	21
	• Appendix 2 - Equality Impact Assessment (EqIA) – Policies	22
	• Appendix 3 - Training Impact Assessment (TIA)	28
	• Appendix 4 - Health Impact Assessment (HIA)	29
	• Appendix 5 - Privacy Impact Assessment (PIA)	36
	• Appendix 6 - One Page Description of Policy	37

Environmental Policy

1. PURPOSE

1.1 The Environmental Management Policy outlines the guiding principles of the Environmental Management System that shall encompass all of the activities, products and services undertaken by Cwm Taf Morgannwg University Health Board (CTMUHB).

1.2 The Policy confirms that the Environmental Management System shall meet the requirements of ISO 14001:2015 environmental standard and applies to all Health Board premises.

1.3 The Policy:

- Includes a commitment by the Health Board to the protection of the environment, including prevention of pollution, sustainable resource use, climate change mitigation and adaptation, protection of biodiversity and ecosystems;
- Includes a commitment to comply with relevant environmental legislation, regulations, compliance obligations and with other requirements to which the organisation subscribes;
- Includes a commitment to continual improvement of its Environmental Management System to enhance environmental performance;
- Provides the framework for setting and reviewing environmental objectives and targets;
- Is documented, implemented, maintained and communicated to all employees within the organisation;
- Is available to interested parties.

1.4 In order to communicate the Policy Statement as widely as possible, it will be:

- Published on the CTMUHB intranet system;
- Displayed at hospital sites main entrances or other prominent locations;
- Made available to any interested party upon request.

2. POLICY STATEMENT

- 2.1 Cwm Taf Morgannwg University Health Board was established on 1st April 2019. We provide quality healthcare to more than 450,000 people principally covering the Merthyr Tydfil, Rhondda Cynon Taf and Bridgend Local Authority areas.
- 2.2 We are responsible for delivering healthcare through three acute hospitals, six community hospitals and a network of health parks, health centres, clinics and facilities for patients with mental health and learning disabilities.
- 2.3 The Health Board is one of the largest employers within the local area. In delivering our role as a healthcare provider we acknowledge our responsibility to maintain a high level of environmental performance, to conform to our compliance obligations and to set and fulfil our environmental objectives with an emphasis on continual improvement.
- 2.4 It is a requirement of the Welsh Government and of the Cwm Taf Morgannwg University Health Board that we maintain ISO 14001:2015 environmental standard certification to demonstrate and reaffirm the Health Board's commitment to minimise the impact of the organisations activities upon the environment.
- 2.5 In doing so, the Health Board requires that all staff and in particular all managers at all levels of the organisation to be aware of, and fully supportive, of our environmental responsibilities.
- 2.6 CTMUHB will ensure that the responsibility for environmental management is clearly defined and there are clear lines of accountability throughout the organisation leading to the board.
- 2.7 CTMUHB will ensure that risks related to the Health Board's impact on the environment are managed effectively in the organisation.

3. PRINCIPLES

3.1 The aims and objectives of this policy are to:

- Ensure that all employees, including staff from other NHS Wales organisations and contractors, are responsible for working in a manner that protects the environment;
- Integrate environmental management into operating procedures to ensure that long term and short term environmental issues are considered;
- Protect the environment by preventing pollution and committing to sustainable resource use, climate change mitigation and adaptation, and protection of biodiversity and ecosystems;
- Ensure compliance with all relevant environmental legislation, obligations, Healthcare Standards for Wales and Welsh Government Directives;
- Audit the ISO 14001 Environmental Management System on a regular basis to identify strengths and areas for improvement, and to highlight actions to prevent deficiencies;
- Review the Environmental Policy regularly to ensure that it is maintained as documented information, is communicated within the organisation and is available to all interested parties;
- Remain committed to continual improvement.

3.2 We intend to reduce our environmental impact by:

- Reducing the consumption of finite resources and to minimise our waste wherever possible. Exceptions will occur during national emergencies where increased use of disposable Personal Protective Equipment (PPE) for staff is in daily use for extended periods of time;
- Working with the Welsh Government Energy Service supporting National and Welsh Government targets of an 80% CO₂ reduction by 2050 and de-carbonisation by 2030, setting year on year objectives to reduce our carbon emissions, and where possible purchase or produce a portion of our energy requirements from renewable sources;
- The management of energy and water consumed at all Health Board premises will be written into the Corporate Energy Policy which provides a prescribed plan for staff to follow to use energy wisely and considerately;
- Promoting the minimisation of waste generated through Health

- Board activities and reducing the environmental impact of waste disposal through landfill diversion and recycling;
- Adopting site travel plans encouraging modal shift from single occupancy car travel to more sustainable modes, such as public transport, car sharing, active travel and flexible working, except in times of national emergency when Government social distancing guidelines must be adhered to by law;
 - Integrating sustainable development and resource use into everyday purchasing decisions;
 - Adopting climate change mitigation and adaptation, and protecting biodiversity and ecosystems.

4 SCOPE

4.1 Definitions

Term	Definition
Environmental Management System <i>(Environmental management systems – Requirements with guidance for use (3.1.2, page 3) (BS EN ISO 14001:2015))</i>	Part of the management system used to manage environmental aspects, fulfil compliance obligations and address risks and opportunities.
Environmental Policy <i>(Environmental management systems – Requirements with guidance for use (3.1.3, page 3) (BS EN ISO 14001:2015))</i>	Intentions and direction of an organisation related to environmental performance, as formally expressed by its top management.
Organisation <i>(Environmental management systems – Requirements with guidance for use (3.1.4, page 3) (BS EN ISO 14001:2015))</i>	Person or group of people that has its own functions with responsibilities, authorities and relationships to achieve its objectives.
Top Management <i>(Environmental management systems – Requirements with guidance for use (3.1.5, page 3) (BS EN ISO 14001:2015))</i>	Person or group of people who directs and controls an organisation at the highest level.

4.2 Scope Specification

- 4.2.1 The Environmental Policy applies to all activities, products and services of Cwm Taf Morgannwg University Health Board.
- 4.2.2 The Policy will be applicable to all directly employed employees of the Health Board as well as any contractors or those employed to provide services.
- 4.2.3 This policy applies to all staff including temporary and voluntary staff, staff from other NHS Wales organisations, student placements, and contractors working on NHS premises, patients, carers, and visitors.

5. LEGISLATIVE AND NHS REQUIREMENTS

5.1 Legislative Requirements

For the purpose of this document, and to support the Health Board's aim to achieve environmental best practice, the leading legislative and NHS requirements in respect of environmental management are highlighted in the references section.

5.2 NHS Requirements

All policies and procedures must provide clarity to meet external legislative and NHS requirements such as Health and Safety Legislation, European legislation and Health Care Inspectorate Wales Standards.

They will need to include reference to the following:

5.2.1 Freedom of Information Act 2000

Policies and procedures are subject to disclosure under the Freedom of Information Act 2000. The Act allows anyone, anywhere to ask for information held by the Health Board and although some sensitive information will be exempt, policies and procedures will be released to the public and businesses on request.

5.2.2 Equality Impact Assessment (EIA)

The Equality Act 2010 requires the undertaking of Equality Impact Assessments (EIAs). All UHB policies will require an EIA. EIAs form a process which finds out whether a policy will affect people differently on the basis of their “protected characteristics” – age, disability, gender reassignment, marriage or civil partnership, pregnancy or maternity, race, religion, sex or sexual orientation as it will affect their human rights. It also takes account of Welsh Language issues. It is designed to ensure that consideration is taken of the needs of all individuals who work for or access the services of the UHB.

5.2.3 Health Impact Assessment (HIA)

All UHB policies will need to be considered for requiring a [Health Impact Assessment](#) (HIA), a process that considers how the health and well-being of a population may be affected by a proposed action. A HIA screening has been undertaken for this policy. The result of the screening was that the impacts that have been identified do not warrant a more comprehensive health impact assessment as the impacts are appropriately managed by the policy. The HIA is attached as (*Appendix 4*).

5.2.4 Privacy Impact Assessment (PIA)

PIA are a process to help consider data protection obligations and to meet individual’s expectations of privacy when starting a new policy, project, plan or proposal using the Cwm Taf Morgannwg Privacy Impact Assessment procedure available on SharePoint.

6. PROCEDURE

- 6.1 As part of the environmental management programme a detailed impacts and aspects register will be completed to include all Health Board activities.
- 6.2 This register will act as the basis through which a suite of procedures will be developed to manage and reduce the environmental consequences of the Health Board activities.

6.3 It is anticipated that the ISO14001:2015 procedures will cover the following activities:

- Document Control
- Communication
- Records Control
- Legal Register and Compliance
- Environmental Aspects
- Operational Control
- Emergency Response
- Objectives and Targets
- Internal Audit
- Environmental Non-Conformity
- Environmental Management Review
- Sustainability Reporting

6.4 The impacts and aspects register will also be used to identify all legislative and other requirements that the Health Board must comply with.

6.5 This Policy will be supported by the environmental manual, the operation of the environmental management system to achieve ISO 14001:2015 certification and the suite of procedures aforementioned.

6.6 The procedures and documents that support this Policy are in place to provide the appropriate guidance to all users of CTMUHB medical devices. These include, but are not limited to:

- CTMUHB Energy Policy
- CTMUHB Waste Policy
- CTMUHB Waste Segregation Procedure
- CTMUHB Sustainable Procurement Policy
- CTMUHB Transport and Travel Policy
- CTMUHB Traffic and Car Parking Management Procedure
- CTMUHB Biodiversity & Ecosystem Resilience Plan
- CTMUHB Flexible Working Policy
- CTMUHB Business Continuity Policy
- CTMUHB Incident Reporting Policy
- CTMUHB Fire Policy
- CTMUHB Asbestos Management Plan
- CTMUHB Water Safety Plan

- CTMUHB Code of Conduct and Safety Rules for Contractors
- CTMUHB Control of Operational Maintenance Contractors Policy

7. TRAINING IMPLICATIONS

7.1 Induction

All Cwm Taf Morgannwg Health Board employees will be required to undertake general environmental awareness training upon the commencement of their employment with the Health Board.

7.2 Continued Training

In addition, existing members of staff will receive continuing training through various environmental initiatives.

7.3 Specialist Training

Specialist training will be provided for key staff, to ensure compliance with environmental legislation and guidance.

8. REVIEW, MONITORING AND AUDIT ARRANGEMENTS

8.1 Summary of Approval Process

- Consultation with: Environmental Management Steering Group (includes Assistant Director of Facilities)
- Sub Group: Environmental Management Steering Group (EMSG)
- Final Approval By: Quality & Safety Committee

8.2 Operational Date

The operational date for this policy will be agreed at the approving committee(s), allowing time for amendments and distribution as required.

8.3 Review of Policies and Procedures

It will be the responsibility of the EMSG, and the Facilities Compliance Team to review the policy every three years. An earlier review may be warranted as a consequence of:

- External audit findings;
- An annual review by the Environmental Management Steering Group;
- A suggestion or complaint concerning the Policy;
- Any other circumstances, as appropriate.

8.4 Audit

This Policy will be audited both internally and externally in line with the requirements of ISO 14001:2015, and the Health Board shall be kept informed on audit findings and / or changes in line with best practice and legal statute.

9. MANAGERIAL RESPONSIBILITIES

9.1 Responsibilities

The relevant responsibilities are highlighted as follows:

9.1.1 Executive Board

The Executive Board has the overall responsibility for ensuring that the correct policies, procedures and systems are in place and that they are constantly under review. The Executive Board discharges its responsibilities through the post of Chief Executive who has delegated responsibility for Environmental policy to the Board.

9.1.2 Assistant Director of Facilities

The Assistant Director will be responsible for:

- Ensuring that effective Environmental Management Systems are in place and that they are reviewed in accordance with Health Board policy;
- Notifying the Chief Executive, relevant Directors and the Executive Board of any environmental issues and/or pending or actual events that will require a coordinated response;
- The provision of advice and guidance to managers, clinicians and other relevant staff with regards to environmental issues.

9.1.3 Facilities Governance & Compliance Manager and Technical & Environmental Compliance Manager

The Facilities Governance & Compliance Manager and Technical & Environmental Compliance Manager are the Environmental Management leads and are responsible for:

- Coordinating the drafting of the suite of procedures required for the safe and effective management of Health Board Environmental impacts;
- Ensuring they are reviewed in accordance with Health Board Policy and circulated for consultation to relevant groups;
- Notifying the Facilities Director of any environmental issues and/or pending or actual events that will require a coordinated response;
- Formulating a framework to implement and maintain a structured Environmental Management System;
- Chairing the Environmental Management Steering Group and progressing the work streams identified.

9.1.4 Environmental Management Steering Group (EMSG)

The Environmental Management Steering Group (EMSG) has been established to coordinate Environmental Management on the behalf of the Facilities Director. The group has no executive powers.

The EMSG membership comprises of:

- CSO-Facilities Assistant Director of Facilities (Chair);
- CSO-Facilities Governance & Compliance Manager (Deputy Chair);
- CSO-Facilities Technical & Environmental Manager;
- Internal EMS Auditors;
- 3 regions (Rhondda, Merthyr, Bridgend) Integrated Locality Group (ILG) Service Group manager lead for operations;
- Environmental leads across the following key areas:
 - Facilities;
 - Estates;
 - Energy;
 - Waste;
 - Transport and Travel;
 - IT & Information;

- Procurement;
- Health and Safety;
- Acute;
- Mental health;
- Community;
- Infection Control;
- Nursing;
- Pharmacy;
- Pathology;
- Workforce and Operational Development.

All members of the EMSG are responsible for supporting the external and internal audit process associated with the ISO 14001:2015 standard certification, the Environmental Management System and the annual sustainability report.

9.2 Consultation Process

The involvement of all appropriate groups, committees, forums and stakeholders responsible for ensuring the safe and effective implementation of policies and procedures is key to the review and development of effective documents. Stakeholders should be asked to contribute, comment and agree the content of a document and asked to provide an equality impact assessment before it is passed to the appropriate Committee or Board for approval.

The responsible Director, working with the Policy Author, should consider the involvement of the key groups in existence within the Health Board when drafting / reviewing policies and procedures.

A list of the persons or groups from whom comments have been invited should be submitted to the approving body for information together with a rationale for the decision of the appropriate consultation option.

9.3 Publication and Dissemination of Policy

The Responsible Director, with help from the Policy Author, will ensure that the approved policy is circulated to appropriate individuals and groups within the Health Board who will need to implement the document.

All policies and procedures in operation within the Health Board are to be made available to all staff via the Intranet site and newly approved policies will need to be communicated to staff as appropriate.

Best management practice requires organisations to establish and maintain a register of all policies and procedures in use. The Board Secretary is responsible for maintaining the index of the policies and procedures developed and this will be published on the website.

10. RETENTION / ARCHIVING

The Health Board's Corporate Secretary will be responsible for retaining copies of all approved versions of the Policy and the procedures and for ensuring that only the most recent version is available on the Health Board intranet site.

11. NON CONFORMANCE

There is a requirement for all staff to comply with this Policy, and demonstrate compliance. Failure to comply will be dealt with under the appropriate CTMUHB Human Resource Policy. Failure to adhere to this policy may compromise patient safety and put patients and staff at risk and leave the organisation vulnerable to patient complaints and litigation.

Non Conformance with this policy might also have an irreversible impact on the environment which could incur fines and penalties, as well as attracting negative press in the public domain.

12. EQUALITY IMPACT ASSESSMENT STATEMENT

An Equality Impact Assessment (EqIA) has been completed. The EqIA is attached as *Appendix 2*.

13. PRIVACY IMPACT ASSESSMENT

The Privacy Impact Assessment (PIA) Screening Tool has been utilised to assess whether a full privacy impact assessment is required for this policy and no impact has been identified. The PIA is attached as *Appendix 3*.

14. REFERENCES

14.1 Government Legislation / Regulations include, but are not limited to:

- The Building Regulations 2010 (SI 2010/2214) Amended 2016.
- The Energy Performance of Buildings (England and Wales) etc. (Amendment) Regulation 2013.
- The Energy Performance of Buildings (Certificates and Inspections) (England and Wales) (Amendment) Regulations 2015.
- The Energy Act 2013 (Commencement No.1) Order 2014.
- Heat Network Regulations 2015.
- The Climate Change Regulations (Wales) 2018.
- Environmental (Wales) Act 2016.
- Wellbeing of Future Generations (Wales) Act 2015
- Water Industry Act 1991 as amended by the Water Industries Act 1993.
- Road Traffic (Vehicle Emissions) (Fixed Penalty) (England) Regulations 2002.
- Climate Change Levy (General) Regulations 2001.
- Clean Air Act 1993 as amended SI 2014/3318, 2015/C.20.
- Ozone Depleting Substances (Qualifications) Regulations 2009.
- CRC Energy Efficiency Scheme (Amendment) Order 2011.
- The Flood and Water Management Act 2010. (commencement No.2) (Wales) Order 2018/557 W.96).
- Environmental Protection Act 1990.
- The Landfill (England and Wales) Regulations 2002.
- The Waste (England and Wales) (Amendment) Regulation 2014 (SI2014/656).
- Controlled Waste Regulations (England and Wales 2012).
- The Waste Enforcement (England and Wales) Regulations 2018 (SI 2018/369).
- The Unauthorised Deposit of Waste (Fixed Penalties) (Wales) Regulations 2017 (SI 2017/1024).
- The Waste Electrical and Electronic Equipment (Amendment) Regulations 2018.
- The Hazardous Waste (Miscellaneous Amendments) (Wales) Regulations 2018 (SI2018/721) (W.140).
- The Waste Batteries and Accumulators (Amendment) Regulations 2015.
- The Contaminated Land (Wales) Regulations 2001.
- Statutory Nuisance (Appeals) Regulations 1995.
- Noise Act 1996.
- Control of Substances Hazardous to Health Regulations 1999.
- The Water Resources (Control of Pollution) (Oil Storage) (Wales) Regulations 2016.
- Anti-Pollution Works Regulations 1999.
- Control of Asbestos Regulations 2012.

TBC – Environmental Policy

- The Ionising Radiation (Basic Safety Standards (Miscellaneous Provisions) (Amendment) (EU Exit) Regulations 2018.
- The Gas Safety (Installation and Use Regulations) (Amendment) Regulation 2018 (for accommodation rented out to staff).
- Mercury Regulations 2017.
- The Environmental Permitting (England and Wales) (Amendment) (No.2) Regulation 2018 (specifically for ionising radiation).
- Wildlife and Countryside Act 1981.
- Countryside and Rights of Way Act 2000.
- Town and Country Planning Act 1990.
- The Town and Country Planning (Tree Preservation Order) (Amendment) Regulations 1988.
- Pesticides Act 1998.
- Conservation of Habitats and Species Regulation 2017 (SI 2017/1012) as amended.
- The Clean Neighbourhood and Environment Act 2005.
- Carriage of Dangerous Goods and Use of Transportable Pressure Receptacles Regulations 2009.
- Environmental Damage (Prevention and Remediation) (Wales) Regulations 2009.
- EU's Environmental Action Programme to 2020.
- Health and Safety at Work Act etc. (1974).
- Equality Act 2010 and associated orders.
- Transport Wales Act (2006).

14.2 NHS relevant standards, Health Technical Memorandums (HTMs) and Welsh Health Technical Memorandums (WHTMs) include:

- Standards for Health Services in Wales – Environment (Standard 12).
- WHTM 07-01 - Safe Management of Healthcare Waste (2013).
- HTM 07-02 - Encode - making energy work in healthcare. Environment and sustainability. Part A: Policy and management 2015 (Published in Wales 2016).
- HTM 07-02 - Encode - making energy work in healthcare. Environment and sustainability. Part B: Procurement and energy considerations for new and existing building facilities 2015 (Published in Wales 2016).
- WHTM 07-03 - NHS Wales Car Parking Management: Environment & sustainability (2015).
- HTM 07-04 - Water management and water efficiency (2012).
- HTM 07-07 - Sustainable health and social care buildings (2011).
- WHC (2017) 50 - Best practice guidance and opportunities for savings through efficiency improvements in the NHS Estate.
- WHC (2017) 018 - Reduction in hospital food waste target from un-served meals to 5%.

TBC – Environmental Policy

- WHC (2008) 058 - Sustainable Plans in NHS Wales.
- WHC (2008) 011 - Reform of Car parking in NHS Hospitals.
- Corporate Health Standard - Welsh Government.
- WHC (2006) 029 - A Healthy Sustainable Wales – The NHS Contribution.
- WHC (2002) 116 Environmental Policy for the NHS Estate.
- Environmental Strategy for the NHS – NHS Estates 2002.
- Sustainable Development in the NHS – NHS Estates 2001.

14.3 Health Board relevant policies and procedures include:

- CTMUHB Energy Policy.
- CTMUHB Waste Policy.
- CTMUHB Waste Segregation Procedure.
- CTMUHB Sustainable Procurement Policy.
- CTMUHB Transport and Travel Policy.
- CTMUHB Traffic and Car Parking Management Procedure.
- CTMUHB Biodiversity & Ecosystem Resilience Plan
- CTMUHB Flexible Working Policy.
- CTMUHB Business Continuity Policy.
- CTMUHB Incident Reporting Policy.
- CTMUHB Fire Policy.
- CTMUHB Asbestos Management Plan.
- CTMUHB Water Safety Plan.
- CTMUHB Code of Conduct and Safety Rules for Contractors.
- CTMUHB Control of Operational Maintenance Contractors Policy.

14.4 Environmental Related Guidance, Resources and Standard Requirements include:

- ISO 14001:2015 - Environmental Management System Standard.
- ISO 14080:2018 - Greenhouse gas management and related activities. Framework and principles for methodologies on climate actions.
- ISO 50001:2018 - Energy management systems. Requirements with guidance for use.
- ISO 14004 - Guidance on the development and implementation of environmental management systems.
- ISO 14030 - Guidance on performance targets and monitoring within an Environmental Management System.
- ISO 19011 - Guidelines for Quality and Environmental Management Systems Auditing.
- Sustrans (Wales).
- Traveline Cymru.

15. APPENDICES

- Appendix 1 - CTMUHB Environmental Policy Statement
- Appendix 2 - Equality Impact Assessment (EqIA) – Policies
- Appendix 3 - Training Impact Assessment (TIA)
- Appendix 4 - Health Impact Assessment (HIA)
- Appendix 5 - Privacy Impact Assessment Screening (PIA)
- Appendix 6 - One Page Description of Policy

DRAFT

Appendix 1 – CTMUHB Environmental Policy Statement



Environmental Policy Statement

Cwm Taf Morgannwg University Health Board was established on 1st April 2019. We are responsible for delivering quality healthcare to more than 450,000 people principally covering the Merthyr Tydfil, Rhondda Cynon Taf and Bridgend Local Authority areas, across three acute hospitals, six community hospitals and a network of health parks, health centres, clinics and facilities for patients with mental health and learning disabilities.

The Health Board is one of the largest employers within the local area. In delivering our role as a healthcare provider we acknowledge our responsibility to maintain a high level of environmental performance, to conform to our compliance obligations and to set and fulfil our environmental objectives with an emphasis on continual improvement.

It is a Welsh Government and Health Board requirement that we maintain the ISO 14001:2015 environmental certification to demonstrate the Health Board's commitment to minimise the impact of its activities upon the environment. In doing so, the Health Board requires all staff, including staff from other NHS Wales organisations and in particular all managers, at all levels of the organisation, are aware of, and fully support our environmental responsibilities.

In particular we shall:

- Ensure that all employees, including staff from other NHS Wales organisations and contractors, are responsible for working in a manner that protects the environment;
- Integrate environmental management into operating procedures to ensure that long term and short term environmental issues are considered;
- Protect the environment by preventing pollution and committing to sustainable resource use, climate change mitigation and adaptation, and protection of biodiversity and ecosystems;
- Ensure compliance with all relevant environmental legislation, obligations, Healthcare Standards for Wales and Welsh Government Directives;
- Audit the ISO 14001 Environmental Management System on a regular basis to identify strengths and areas for improvement, and to highlight actions to prevent deficiencies;
- Review the Environmental Policy regularly to ensure that it is maintained as documented information, is communicated within the organisation and is available to all interested parties;
- Remain committed to continual improvement.

In particular we intend to reduce our environmental impact by:

- Reducing the consumption of finite resources and to minimise our waste wherever possible;
- Supporting National and Welsh Government targets of an 80% CO₂ reduction by 2050 and decarbonisation by 2030, setting year on year objectives to reduce our carbon emissions, and where possible purchase or produce a portion of our energy requirements from renewable sources;
- Promoting the minimisation of waste generated through Health Board activities and reducing the environmental impact of waste disposal through landfill diversion and recycling;
- Adopting site travel plans encouraging modal shift from single occupancy car travel to more sustainable modes, such as public transport, car sharing, active travel and flexible working;
- Integrating sustainable development and resource use into everyday purchasing decisions;
- Adopting climate change mitigation and adaptation, and protecting biodiversity and ecosystems.

Appendix 2 - Equality Impact Assessment (EqIA) - Policies

Section 1: Preparation

This section must be completed at the beginning of a policy review. For advice on its completion please contact the Equality Team on 01443 744800. For examples of completed EIAs please see the Equality site under Useful Staff Information on SharePoint.

Section 1 – Preparation		
1.	<p>Title of Policy - what are you equality impact assessing? Please state whether it is a new or existing policy?</p>	<p>Environmental Policy</p>
2.	<p>Policy Aims and Brief Description - what are its aims? Give a brief description of the Policy (The What, Why and How?)</p>	<p>Requirement of WG to achieve ISO14001:2015 certification for Environmental Management.</p> <p>The aims of this policy are to:</p> <ul style="list-style-type: none"> • Ensure that all employees, including volunteers and contractors, are responsible for working in a manner that protects the environment; • Integrate environmental management into operating procedures to ensure that long term and short term environmental issues are considered; • Protect the environment by preventing pollution and committing to sustainable resource use, climate change mitigation and adaptation, and protection of biodiversity and ecosystems; • Ensure compliance with all relevant environmental legislation, obligations, Healthcare Standards for Wales and Welsh Government Directives; • Audit the ISO 14001 Environmental Management System on a regular basis to identify strengths and areas for improvement, and to highlight actions to prevent deficiencies; • Review the Environmental Policy

Section 1 – Preparation		
		regularly to ensure that it is maintained as documented information, is communicated within the organisation and is available to all interested parties; <ul style="list-style-type: none"> • Remain committed to continual improvement.
3.	Who Owns/Defines the Policy? - who is responsible for the Policy/work?	CSO-Facilities Assistant Director of Facilities, Facilities Governance & Compliance Manager, Technical & Environmental Compliance Manager
4.	Who is Involved in undertaking this EqIA? - who are the key contributors and what are their roles in the process?	CSO-Facilities Governance & Compliance Manager, Technical & Environmental Compliance Manager
5.	Other Policies - Describe where this Policy/work fits in a wider context. Is it related to any other policies/activities that could be included in this EqIA? Is it relevant to the Integrated Medium Term Plan (IMTP)	<p>This Policy will facilitate a clear approach to managing the Health Board’s impact on the environment.</p> <p>Other relevant policies referenced in the policy include:</p> <ul style="list-style-type: none"> • Energy Policy • Waste Policy • Transport and Travel Policy • Biodiversity & Ecosystem Resilience Plan • Business Continuity Policy <p>ISO 14001 certification is included within the Facilities Integrated Medium Term Plan (IMTP).</p>
6.	What might help/hinder the success of the policy? These could be internal or external factors. E.g. training, awareness raising.	Staff not being aware of the policy. Top Management (Board and Senior Management) support.
7.	Is the policy relevant to “eliminating discrimination and eliminating harassment?”	The policy is not directly relevant to eliminating discrimination and harassment.

Section 1 – Preparation		
8.	Is the policy relevant to “promoting equality of opportunity?”	The aim of all Cwm Taf Morgannwg UHB policies will be to promote the equality of opportunity. This policy facilitates a clear approach to managing the Health Board’s impact on the environment and includes the equality impact assessment.
9.	Is the policy relevant to “promoting good relationships and positive attitudes?”	The aim of all Cwm Taf Morgannwg University Health Board policies will be to promote good relationships and positive attitudes. This policy facilitates a clear approach to managing the Health Board’s impact on the environment and includes the equality impact assessment.

Section 2. Impact	
Please answer the following Consider and refer to the information you have gathered from census data, relevant organisations and groups, staff groups, individuals etc. Please indicate the likelihood and risk associated with the issues raised.	
Do you think that the policy impacts on people because of their age? (This includes children and young people up to 18 and older people)	Not specifically as the policy facilitates a clear approach to managing the Health Board’s impact on the environment and includes the equality impact assessment.
Do you think that the policy impacts on people because of their caring responsibilities? I,e, would it affect their ability to care for somebody who is primarily dependant on them	Not specifically as the policy facilitates a clear approach to managing the Health Board’s impact on the environment and includes the equality impact assessment.
Do you think that the policy impacts on people because of their disability? E.g. sensory loss, physical disability, Learning disability, some mental health issues	Not specifically as the policy facilitates a clear approach to managing the Health Board’s impact on the environment and includes the equality impact assessment.
Do you think that the policy impacts on people because of Gender reassignment? This includes all people included under trans* e.g. transgender, non-binary, gender fluid etc	Not specifically as the policy facilitates a clear approach to managing the Health Board’s impact on the environment and includes the equality impact assessment.
Do you think that the policy impacts on people because of their being married or in a civil partnership?	Not specifically as the policy facilitates a clear approach to managing the Health Board’s impact on the environment and includes the equality impact assessment.

Section 2. Impact	
Do you think that the policy impacts on people because of their being pregnant or having recently had a baby?	Not specifically as the policy facilitates a clear approach to managing the Health Board's impact on the environment and includes the equality impact assessment.
Do you think that the policy impacts on people because of their race? (This includes colour, nationality and citizenship or ethnic or national origin such as Gypsy and Traveller Communities.)	Not specifically as the policy facilitates a clear approach to managing the Health Board's impact on the environment and includes the equality impact assessment.
Do you think that the policy impacts on people because of their religion, belief or non-belief? (Religious groups cover a wide range including Buddhist, Christians, Hindus, Jews, Muslims, and Sikhs)	Not specifically as the policy facilitates a clear approach to managing the Health Board's impact on the environment and includes the equality impact assessment.
Do you think that the policy impacts on men and woman in different ways?	Not specifically as the policy facilitates a clear approach to managing the Health Board's impact on the environment and includes the equality impact assessment.
Do you think that the policy impacts on people because of their sexual orientation? (This includes Gay men, heterosexual, lesbian and bisexual people)	Not specifically as the policy facilitates a clear approach to managing the Health Board's impact on the environment and includes the equality impact assessment.
Do you think that the policy impacts on people because of their Welsh language? (e.g. the active offer to receive services in Welsh, bilingual information etc)	Not specifically as the policy facilitates a clear approach to managing the Health Board's impact on the environment and includes the equality impact assessment.

The Human Rights Act contains 15 rights, all of which NHS organisation have a duty to act compatibly with and to respect, protect and fulfil. The 7 rights that are particularly relevant to healthcare are listed below.

Consider the relevance of your Policy to these Human Rights and list any available information to suggest the Policy may interfere with, or restrict the enjoyment of these rights.

The right to life

The Environmental Policy promotes managing the Health Board’s impact on the environment in order to ensure the sustainability of resources for future generations.

The right not be tortured or treated in an inhuman or degrading way

No specific impact.

The right to liberty

No specific impact.

The right to a fair trial

No specific impact.

The right to respect for private and family life, home and correspondence

No specific impact.

The right to freedom of thought, conscience and religion

No specific impact.

The right not be discriminated against in relation to any of the rights contained in the Human Rights Act

No specific impact on human rights identified.

Section 3 Outcome Report

Policy Title:	Environmental Policy
Organisation:	Cwm Taf Morgannwg University Health Board
Name: Title: Department: Date:	David Williams CSO-Facilities Governance & Compliance Manager Facilities Directorate 19 November 2019
Summary of Assessment: Please indicate issues of significant concern and changes that will be made to the policy accordingly. Please indicate whether these changes have been made.	The Policy provides the necessary information to facilitate a clear approach to managing the Health Board's impact on the environment. Therefore there are no specific issues of concern identified in relation to equality and diversity. No changes are required.
Please indicate where issues have been raised but the policy has not been changed and indicate reasons and alternative action taken where appropriate.	Not applicable
Monitoring Arrangements:	Annual review by the CSO-Facilities Governance & Compliance Manager or in response to a particular issue.
Review Date: This is usually the same as the policy review date.	The policy will be reviewed annually by the responsible manager and a date for review will be agreed with the CSO-Facilities Governance & Compliance Manager and Technical & Environmental Compliance Manager
Signature of all Parties:	David Williams Richard Edwards

Appendix 3 - Training Impact Assessment (TIA)

If training requirements are identified a policy training impact assessment is to be completed and forwarded to the Workforce and Organisational Development Directorate

1. Will training be required as a result of the policy?

Yes	Proceed to question 2
No	If no, please state how this policy will be communicated within the UHB

2. Please complete the following information relating to training

Course/ policy title	Environmental Management
Course type	Environmental Awareness
Reference to KSF/NMC Dimensions	Yes
Target Audience (refers to scope of policy)	All staff
Course / policy training objectives	
Course / policy training content	
Duration of course / programme	E-learning (ESR), MS Teams or face to face
Name of trainer (or policy lead)	
Approximate cost of providing training	
Please embed lesson plan, link to e- learning, presentation or other relevant learning material	

Appendix 4 – Health Impact Assessment (HIA)

Title of Policy		Environmental Policy	
1. Lifestyles	Positive Impacts	Negative Impacts	Vulnerable Groups Affected
Diet	N/A	N/A	N/A
Physical activity	N/A	N/A	N/A
Use of alcohol, cigarettes, non-prescribed drugs	N/A	N/A	N/A
Sexual activity	N/A	N/A	N/A
Other risk-taking activity	N/A	N/A	N/A
2. Social and community influences on health	Positive Impacts	Negative Impacts	Vulnerable Groups Affected
Family organisation and roles	N/A	N/A	N/A
Citizen power and influence	N/A	N/A	N/A
Social support and social networks	N/A	N/A	N/A
Neighbourliness	N/A	N/A	N/A
Sense of belonging	N/A	N/A	N/A
Local pride	N/A	N/A	N/A
Divisions in community	N/A	N/A	N/A
Social isolation	N/A	N/A	N/A
Peer pressure	N/A	N/A	N/A
Community identity	N/A	N/A	N/A
Cultural and spiritual ethos	N/A	N/A	N/A
Racism	N/A	N/A	N/A
Other social exclusion	N/A	N/A	N/A
3. Living/ environmental conditions affecting health	Positive Impacts	Negative Impacts	Vulnerable Groups Affected
Built environment	The Environmental Policy promotes managing the Health Board's impact on the environment through	Without policy, potential to reduce the sustainability of resources for future generations.	Service Users - Staff, Patients, Visitors.

TBC – Environmental Policy

	sustainable construction, in order to ensure the sustainability of resources for future generations.		
Neighbourhood design	N/A	N/A	N/A
Housing	N/A	N/A	N/A
Indoor environment	The Environmental Policy promotes managing the Health Board's impact on the environment through energy saving and waste storage and disposal infrastructure, in order to ensure the sustainability of resources for future generations.	Without policy, potential to reduce the sustainability of resources for future generations.	Service Users - Staff, Patients, Visitors.
Noise	The Environmental Policy promotes managing the Health Board's noise impact on the environment, in order to ensure the sustainability of resources for future generations.	Without policy, potential to reduce the sustainability of resources for future generations.	Service Users - Staff, Patients, Visitors.
Air and water quality	The Environmental Policy promotes managing the Health Board's impact on the environment through carbon emissions from	Without policy, potential to reduce the sustainability of resources for future generations.	Service Users - Staff, Patients, Visitors.

TBC – Environmental Policy

	energy use and transport, in order to ensure the sustainability of resources for future generations.		
Attractiveness of area	The Environmental Policy promotes managing the Health Board’s impact on the environment, particularly biodiversity, in order to ensure the sustainability of resources for future generations.	Without policy, potential to reduce the sustainability of resources for future generations.	Service Users - Staff, Patients, Visitors.
Green space	The Environmental Policy promotes managing the Health Board’s impact on the environment, particularly biodiversity, in order to ensure the sustainability of resources for future generations.	Without policy, potential to reduce the sustainability of resources for future generations.	Service Users - Staff, Patients, Visitors.
Community safety	N/A	N/A	N/A
Smell/odour	N/A	N/A	N/A
Waste disposal	The Environmental Policy promotes managing the Health Board’s impact on the environment, particularly through reducing waste generation	Without policy, potential to reduce the sustainability of resources for future generations.	Service Users - Staff, Patients, Visitors.

	and encouraging waste segregation and recycling wherever possible, in order to ensure the sustainability of resources for future generations.		
Road hazards	N/A	N/A	N/A
Injury hazards	N/A	N/A	N/A
Quality and safety of play areas	N/A	N/A	N/A
4. Economic conditions affecting health	Positive Impacts	Negative Impacts	Vulnerable Groups Affected
Unemployment	N/A	N/A	N/A
Income	N/A	N/A	N/A
Economic inactivity	N/A	N/A	N/A
Type of employment	N/A	N/A	N/A
Workplace conditions	The Environmental Policy promotes managing the Health Board's impact on the environment which can improve the wellbeing of staff, patients and visitors at Health Board sites.	Without policy, potential to reduce the sustainability of resources, negatively affecting workplace conditions for future generations.	Service Users - Staff, Patients, Visitors.
5. Access and quality of services	Positive Impacts	Negative Impacts	Vulnerable Groups Affected
Medical services	N/A	N/A	N/A
Other caring services	N/A	N/A	N/A
Careers advice	N/A	N/A	N/A
Shops and commercial services	N/A	N/A	N/A
Public amenities	N/A	N/A	N/A
Transport including parking	The Environmental Policy promotes managing the	Without policy, potential to reduce the sustainability of travel	Service Users - Staff, Patients, Visitors.

	<p>Health Board's impact on the environment, particularly regarding transport emissions, promoting electrical vehicles, flexible working and videoconference facility use which can improve transport issues such as congestion and emissions for staff, patients and visitors at Health Board sites.</p>	<p>resources, negatively affecting conditions such as air quality and workplace conditions etc. for future generations.</p>	
<p>Education and training</p>	<p>The Environmental Policy promotes education and training that will allow staff to manage their impact on the environment, in order to ensure the sustainability of resources for future generations</p>	<p>Without policy, potential to not promote education and training leading to reducing the sustainability of resources.</p>	<p>Staff.</p>
<p>Information technology</p>	<p>The Environmental Policy promotes flexible working, remote working and videoconference facility use, supported by compatible IT systems, which can improve</p>	<p>Without policy, potential to not promote flexible working, remote working and videoconference facility use leading to reducing the sustainability of resources.</p>	<p>Service Users - Staff, Patients, Visitors.</p>

	transport issues such as congestion and emissions for staff, patients and visitors at Health Board sites.		
6. Macro-economic, environmental and sustainability factors	Positive Impacts	Negative Impacts	Vulnerable Groups Affected
Government policies	The Environmental Policy promotes managing the Health Board’s impact on the environment in order to ensure the sustainability of resources for future generations, in line with Government requirements and legislation.	Without policy, the organisation is not complying with Government requirements and legislation.	Service Users - Staff, Patients, Visitors.
Gross Domestic Product	N/A	N/A	N/A
Economic development	N/A	N/A	N/A
Biological diversity	The Environmental Policy promotes managing the Health Board’s impact on the environment in order to ensure the sustainability of resources for future generations, by managing biodiversity on all HB sites.	N/A	Service Users - Staff, Patients, Visitors. Wildlife.

<p>Climate</p>	<p>The Environmental Policy promotes managing the Health Board’s impact on the environment in order to ensure the sustainability of resources for future generations, through managing and reducing the emissions generated by the HB.</p>	<p>N/A</p>	<p>Service Users - Staff, Patients, Visitors.</p>
----------------	--	------------	---

DRAFT

Appendix 5 – Privacy Impact Assessment (PIA)**Screening Questions**

Answer the questions below to identify whether your policy/ procedure or project is likely to need a PIA.

	Questions – please tick appropriate answer	Yes	No
1.	Will the policy involve the collection of new information about individuals?		✓
2.	Will the policy compel individuals to provide information about themselves?		✓
3.	Will information about individuals be disclosed to organisations or people who have not previously had routine access to the information?		✓
4.	Are you using information about individuals for a purpose it is not currently used for or in a way it is not currently used?		✓
5.	Does the policy involve you using new technology which might be perceived as being privacy intrusive? For example, the use of biometrics or facial recognition.		✓
6.	Does the policy result in you making decisions or taking action against individuals in ways which can have a significant impact on them?		✓
7.	Is the information about individuals of a kind particularly likely to raise privacy concerns or expectations? For example, health records or other information that people would consider to be particularly private?		✓
8.	Will the policy require you to contact individuals in ways which they may find intrusive?		✓

Where you have answered yes to one or more of these questions, it is a likely indication that a PIA would be a useful exercise. If you are in any doubt as to whether a PIA is required, support is available the [Information Governance Team](#).

<p><u>Appendix 6 - One Page Description of Policy</u> Reference TBC: Environmental Policy</p>
<p>Distribution All Staff via Intranet</p>
<p>Summary This Policy has been endorsed by top management (Chief Executive and Executive Board) and outlines the guiding principles of the Environmental Management System (EMS) that shall encompass all activities, products and services undertaken by Cwm Taf Morgannwg University Health Board (CTMUHB). It confirms that the EMS shall meet the requirements of the ISO 14001:2015 environmental standard and applies to all Health Board premises and leased premises. It includes a commitment to the protection of the environment, including prevention of pollution, sustainable resource use, climate change mitigation and adaptation, protection of biodiversity and ecosystems, fulfilling compliance obligations, providing a framework for setting and reviewing environmental objectives and targets, and continuing to develop its EMS to enhance environmental performance.</p>
<p>Relevance</p> <ul style="list-style-type: none"> • The policy will be referred to for all activities, products and services having an environmental impact, undertaken by employed employees of CTMUHB as well as contractors, volunteers or those employed to provide services; • Useful for staff seeking advice on examples of policy templates completed Equality & Privacy Impact Assessment processes etc.; • Checking policy prior to sending to appropriate committee.
<p>Relevance for On Call Managers This Policy would be relevant for On Call Managers.</p>
<p>Read in association with These include, but are not limited to:</p> <ul style="list-style-type: none"> • CTMUHB Energy Policy • CTMUHB Waste Policy • CTMUHB Sustainable Procurement Policy • CTMUHB Transport and Travel Policy • CTMUHB Biodiversity & Ecosystem Resilience Plan • CTMUHB Flexible Working Policy • CTMUHB Business Continuity Policy • CTMUHB Incident Reporting Policy • CTMUHB Code of Conduct and Safety Rules for Contractors • CTMUHB Control of Operational Maintenance Contractors Policy • CTMUHB Water Safety Plan
<p>Expiry date and Author / Contact Point The Policy expires in TBC and the author is David Williams (Facilities Governance & Compliance Manager), supported by Richard Edwards (Compliance Manager).</p>