

## **Meeting of Bristol Clinical Commissioning Group Governing Body**

To be held on Tuesday, 29<sup>th</sup> October 2013  
commencing at 1.30 pm in the Bealey Room,  
The Southville Centre, Bealey Road, Southville,  
Bristol, BS3 1QG

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### **Sustainability Policy and Action Plan Agenda Item: 10**

#### **1 Purpose**

To outline NHS Bristol Clinical Commissioning Group's approach to sustainability and approve the action plan.

#### **2 Background**

##### **2.1 What is Sustainable Health Care?**

Sustainability can be defined as meeting the needs of today without compromising the needs of tomorrow. Therefore a sustainable organisation is one that often has the best chance of long term survival.

Sustainable commissioning is the process by which commissioners improve both the sustainability of an organisation and the way that it provides services and interacts with people in the community. Clinical Commissioning Groups (CCGs) should commit to developing opportunities for improved patient outcomes from sustainable healthcare that are safe, smart, ethical and future proof because this approach;

- saves money
- produces health benefits as well as other advantages, in both the short and long term
- helps NHS organisations use their commissioning and purchasing power to improve local accountability and leadership
- ensures natural resources can be used to best effect
- helps NHS services comply with the legal duty to cut carbon emissions under the 2008 Climate Change Act

##### **2.2 Policy Background**

The NHS is subject to a number of policy and legislative drivers for sustainability. These are included as Appendix 1.

In summary for CCGs this includes statutory obligations enshrined in the Climate Change Act 2008 (a legal target for the NHS to reduce carbon emissions by 10% by 2015, from a 2007 baseline), and a duty – The Public Services (Social Value) Act 2012, which came into force from January 2012, to consider social value

ahead of a procurement involving public services contracts (within the meaning of the Public Contracts Regulations 2006). CCGs must consider how they might use those contracts to improve the economic, social and environmental wellbeing of a community.

Additionally the CCG Assurance framework, NHS Constitution and NHS Operating Framework 2012/113 all place requirements on CCGs.

### 2.2.1 The CCG Assurance Framework

The CCG Assurance Framework proposes six domains for assurance of organisational health and capability. Domain 4 covers sustainability:

*Domain 4: Proper constitutional and governance arrangements, and the capacity and capability to deliver all their duties and responsibilities including:*

- Ability to manage all aspects of quality
- Ability to commission the full range of services
- Use of information to deliver an open and transparent culture
- Financial control and capacity
- Environmental and social sustainability

### 2.2.2 NHS Constitution

The NHS Constitution sets out the seven key principles that guide the NHS in all it does. They are underpinned by core NHS values which have been derived from extensive discussions with staff, patients and the public.

Principle 6 - The NHS is committed to providing best value for taxpayers' money and the most effective, fair and sustainable use of finite resources. Public funds for healthcare will be devoted solely to the benefit of the people that the NHS serves"

### 2.2.3 NHS Operating Framework 2012/13

Section 2.45 pg. 21 – "Emergency preparedness, resilience and response across the NHS continues to be a core function of the NHS, required in line with the Civil Contingencies Act 2004. Accountability arrangements should be clear at all times throughout the transition and organisations must continue to test and review their arrangements. All NHS organisations are required to maintain a good standard of preparedness to respond safely and effectively to a full spectrum of threats, hazards and disruptive events"

Sustainable development and carbon management are corporate responsibilities. Clear governance provides an assurance process that considers requirements, both in terms of the law and to achieve high quality healthcare.

Demonstrating high quality healthcare will not be possible without embedding sustainable development into NHS management and governance processes. This requires boards/ governing bodies, managers, clinicians, nurses and many other NHS staff groups to champion sustainability.

The NHS Carbon Reduction Strategy asks all NHS organisations to sign up to the Good Corporate Citizen Assessment Model 2 and to produce a Board approved Sustainable Development Management Plan (SDMP). Additionally, the following drivers illustrate the requirement for CCGs to have a contract option for managing their statutory obligations.

### **2.3 Sustainable Commissioning for CCGs**

CCGs, as commissioning and contracting organisations, will need effective contract mechanisms to deliver their ambitions for sustainable healthcare delivery.

The commitment to this policy agenda is being supported, at a national level, through the development of a suite of support products that Commissioning Support Units will use to support their CCGs.

Locally Bristol CCG will work with the South West Commissioning Support Unit (CSU) to build on local work by predecessor organisations, ensure that best practice is shared across the wider health community and fulfil its statutory obligations.

## **3 Action Plan**

The action plan to support the policy agenda is attached as Appendix 2 to this paper. The plan will allow Bristol CCG to:

- Develop a more detailed local understanding of performance through systematic measurement of environmental impacts across providers
- Exploit the synergies between environmental sustainability and other organisational objectives
- Exploit the opportunities presented by applying sustainability to procurement policies and embedding performance management approaches to providers
- Improve medicines management and prescribing practice to reduce inefficient or wasteful use of pharmaceuticals

## **4 Reporting back to the CCG Governing Body**

A report on achievement of the plan and proposal for next year's action plan will be brought to the Governing Body in November 2014 unless otherwise nationally directed.

## **5 How have service users, carers and local people been involved?**

This policy will indirectly benefit all users of health services in Bristol but users, carers and local people have not been involved in producing this paper. They will be involved in the implementation of the policy and plan.

## **6 Implications on equalities and health inequalities**

This work should ensure inequalities are reduced rather than widened. An assessment of impact on equalities or health inequalities will be a key part of developing the action plan.

## **7 Financial Implications**

The current financial implications are the cost of staff time used in developing and implementing this action plan. Any additional cost will be notified to the Governing Body as this works develops.

## **8 Legal implications**

There are no legal issues raised in this paper.

Risk implications, assessment and mitigation: There are risks to the business continuity of contractors and to the future sustainability of the health service if we do not implement this policy.

## **9 How does this fit with Bristol CCG's Annual Work Plan or Strategic Objectives?**

This policy is in keeping with Bristol CCGs overall aims and objectives.

## **10 Recommendation**

Support the approach to policy and agree the action plan at Appendix 2 for commissioning sustainable health care.

Agree that this will work be led until further notice by Ulrich Freudenstein (Governing Body and Karin Smyth (Locality Manager) supported by Nik Attryde (SWCSU).

**Ulrich Freudenstein  
Karin Smyth  
Nik Attryde  
Head of Business Development  
South West Commissioning Support**

## **Glossary of terms and abbreviations**

**CCG – Clinical Commissioning Group  
CSU – Commissioning Support Unit  
BCC – Bristol City Council  
NHS – National Health Service**

## Appendix 1

### Policy and Legislative Drivers for Sustainability

Driver	What is it?	What does it require organisations to do?	Is it a Statutory, Regulatory or NHS Policy duty?	Links to guidance and further information
Public Services (Social Value) Act 2012	The Public Services (Social Value) Act 2012, requires all commissioners of public services to consider taking into account economic, social and environmental value, not just price, when buying goods and services.	The guidance for commissioners of public services has not yet been published. However, it is likely that it will include a requirement for commissioners to evidence a Triple Bottom Line (show Social, Environment and Economic assessments of commissioning decisions in a balanced way). This may include a Social Return on Investment assessment or the development of a Sustainable Development Management/Commissioning Plan for Commissioning Plans.	Statutory	<a href="http://www.legislation.gov.uk/ukpga/2012/3/pdfs/ukpga_20120003_en.pdf">http://www.legislation.gov.uk/ukpga/2012/3/pdfs/ukpga_20120003_en.pdf</a> <a href="http://www.sdu.nhs.uk/documents/publications/SD_for_CCGs.pdf">http://www.sdu.nhs.uk/documents/publications/SD_for_CCGs.pdf</a> The SDU will be producing further guidance for CCGs on this once released by the Cabinet Office.
Climate Change Act 2008	UK legislation – long term legally binding framework to reduce carbon emissions, mitigate and adapt to climate change. The Climate Change Act became law on 26th November 2008. Further Carbon Budgets are milestones towards 2050, the latest Carbon Budget targets became law in June 2011.	<b>UK Climate Change Act Targets</b> reduction in CO <sub>2</sub> e by 2050 (1990 baseline) - 34% by 2020 - 50% by 2025 - 80% by 2050 Shorter term NHS target of 10% by 2015 (2007 baseline)	Statutory	<a href="http://www.legislation.gov.uk/ukpga/2008/27/contents">www.legislation.gov.uk/ukpga/2008/27/contents</a> <a href="http://www.decc.gov.uk/en/content/cms/emissions/carbon_budgets/carbon_budgets.aspx">http://www.decc.gov.uk/en/content/cms/emissions/carbon_budgets/carbon_budgets.aspx</a>
HM Treasury Sustainability Reporting Framework	The Government Financial Reporting Manual (FReM) now includes mandatory sustainability and environmental reporting from 2011/12. Monitor and DH use FReM as the basis for NHS annual financial reporting. From 2011/12 onwards the framework will be part of the mandatory accounts direction issued by the DH.	The sustainability and environmental framework is included in the annual reports for NHS organisations. A template has been created by DH to simplify the reporting for NHS organisations and is available on the SDU website.	Regulatory	<a href="http://www.hm-treasury.gov.uk/frem_sustainability.htm">www.hm-treasury.gov.uk/frem_sustainability.htm</a> <a href="http://www.sdu.nhs.uk/sd_and_the_nhs/reporting.aspx">www.sdu.nhs.uk/sd_and_the_nhs/reporting.aspx</a>

Driver	What is it?	What does it require organisations to do?	Is it a Statutory, Regulatory or NHS Policy duty?	Links to guidance and further information
NHS Carbon Reduction Strategy (CRS)	The CRS sets an ambition for the NHS to help drive change towards a low carbon society. Published in response to the Climate Change Act	It sets an interim NHS target of a 10% reduction in CO <sub>2</sub> e emissions by 2015 (based on a 2007 baseline)	NHS Policy	<a href="http://www.sdu.nhs.uk/publications-resources/3/NHS-Carbon-Reduction-Strategy">www.sdu.nhs.uk/publications-resources/3/NHS-Carbon-Reduction-Strategy</a>
NHS Annual Governance Statement (AGS)	The NHS Annual Governance Statement replaces the Statement on Internal Control and is an annual reporting requirement for NHS organisations. It provides assurance that resources are being appropriately managed.	From 2009/10 organisations are required to include mandatory disclosures on climate change adaptation and mitigation. This ensures risk assessments have been undertaken and plans are in place to comply with the Climate Change Act and the Civil Contingencies Act	Regulatory	<a href="http://www.monitor-nhsft.gov.uk/home/our-publications/browse-category/guidance-foundation-trusts/mandatory-guidance/nhs-foundation-t-3">http://www.monitor-nhsft.gov.uk/home/our-publications/browse-category/guidance-foundation-trusts/mandatory-guidance/nhs-foundation-t-3</a> <a href="http://www.dh.gov.uk/en/Publicationsandstatistics/Lettersandcirculars/Dearcolleagueletters/DH_132925">http://www.dh.gov.uk/en/Publicationsandstatistics/Lettersandcirculars/Dearcolleagueletters/DH_132925</a> <a href="http://www.dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/documents/digitalasset/dh_113532.pdf">http://www.dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/documents/digitalasset/dh_113532.pdf</a> <a href="http://www.sdu.nhs.uk/publications-resources/17/Adaptation-to-Climate-Change-in-NHS-Organisations/">http://www.sdu.nhs.uk/publications-resources/17/Adaptation-to-Climate-Change-in-NHS-Organisations/</a>
Monitor regulation of Foundation Trusts	Monitor regulates Foundation Trusts using two categories for the risk rating: finance and governance. The code of governance highlights both the reputational and financial responsibilities of the board to both staff and other stakeholders in the community.	The local community forms a key stakeholder for Foundation Trusts. One identified role for directors and governors is to ensure there is regular and open dialogue with stakeholders including members, patients and the local community.	Regulatory	<a href="http://www.monitor-nhsft.gov.uk/home/our-publications/browse-category/guidance-foundation-trusts/mandatory-guidance/code-governance">http://www.monitor-nhsft.gov.uk/home/our-publications/browse-category/guidance-foundation-trusts/mandatory-guidance/code-governance</a>

Driver	What is it?	What does it require organisations to do?	Is it a Statutory, Regulatory or NHS Policy duty?	Links to guidance and further information
Route Map for Sustainable Health	The Route Map is a strategic framework for action to develop a sustainable health system. It identifies the areas that require progress in order to save money and resources, improve health and make changes future proof	The Route Map does not impose any new requirements. It is an invitation to be part of a collaboration that will set the direction of the health and care system now and in the future. Resources in the Route Map are there to help you coordinate and take action so your organisation can save money, resources and improve health	NHS Policy	<a href="http://www.sdu.nhs.uk/sd_and_the_nhs/route-map.aspx">www.sdu.nhs.uk/sd_and_the_nhs/route-map.aspx</a>
Public Health Outcomes Framework	Outcomes Framework for public health at national and local levels consists of five domains.	Domain 1 (Health Protection and Resilience) Public sector organisations with a board-approved Sustainable Development Management Plan (SDMP)	NHS Policy	<a href="http://www.dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/@dh/@en/documents/digitalasset/dh_132559.pdf">http://www.dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/@dh/@en/documents/digitalasset/dh_132559.pdf</a>
Liberating the NHS White Paper	The White Paper outlines the UK government's strategy for the NHS	Section 5.17 states: “...Further efficiencies can, and need to, be made from improving energy efficiency and developing more sustainable forms of delivery across the NHS...”	NHS Policy	<a href="http://www.dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/@dh/@en/@ps/documents/digitalasset/dh_117794.pdf">www.dh.gov.uk/prod_consum_dh/groups/dh_digitalassets/@dh/@en/@ps/documents/digitalasset/dh_117794.pdf</a>
Civil Contingencies Act 2004	The Civil Contingencies Act 2004 requires all NHS organisations to prepare for adverse events/ incidents.	Organisations must demonstrate they have undertaken risk assessments, and Carbon Reduction Delivery Plans are in place in accordance with emergency preparedness and civil contingency requirements	Statutory	<a href="http://www.legislation.gov.uk/all?title=civil%20contingencies">www.legislation.gov.uk/all?title=civil%20contingencies</a>

Driver	What is it?	What does it require organisations to do?	Is it a Statutory, Regulatory or NHS Policy duty?	Links to guidance and further information
NHS Bilateral & Multilateral Contracts	The NHS Bilateral and Multilateral Contracts requires providers to evidence 'measured' progress on a range of sustainability metrics	In light of the requirements of the Climate Change Act 2008, the Department's Sustainability Strategy "Taking the long term view", and in line with the national NHS Strategy: "Saving Carbon, Improving Health", the Provider shall, as applicable, demonstrate their measured progress on climate change adaptation, mitigation and sustainable development, including performance against carbon reduction management plans [format method and timeframe for delivery to be defined locally]	Contract Policy	<a href="http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_111203">http://www.dh.gov.uk/en/Publicationsandstatistics/Publications/PublicationsPolicyAndGuidance/DH_111203</a>
Carbon Reduction Commitment (CRC)	The Carbon Reduction Commitment Energy Efficiency Scheme (CRC) is a mandatory energy efficiency scheme that will affect the majority of NHS hospitals. The CRC Energy Efficiency Scheme was introduced by government in 2008.	Organisations that meet the qualification criteria, based on how much electricity they consumed, will be obliged to participate in the CRC. The better an organisation performs in terms of cutting its emissions, the higher it will appear in the annual performance league table. Failure to comply, no matter how much energy you use, is likely to result in a penalty.	Regulatory	<a href="http://www.sdu.nhs.uk/sd_and_the_nhs/sd-governance/crc-energy-efficiency-scheme.aspx">www.sdu.nhs.uk/sd_and_the_nhs/sd-governance/crc-energy-efficiency-scheme.aspx</a>  <a href="http://www.environment-agency.gov.uk/business/topics/pollution/126698.aspx">http://www.environment-agency.gov.uk/business/topics/pollution/126698.aspx</a>



## Appendix 2 Action Plan

### **1 Ensure Bristol CCG is a sustainable organisation**

1.1 Appoint a clinical and managerial lead to ensure the organisation is fulfilling its obligations and leading this work.

1.2 Invite staff to become 'sustainability champions' with a view to identifying and promoting actions and activities that support sustainable development, for example, approach to energy use, travel and in-house waste recycling.

1.3 Work with internal CCG teams to agree how to integrate sustainability into their work. For example medicines management who will need agree how to integrate sustainability into prescribing practice and localities who can identify promoters of sustainable health care at locality level.

1.4 Consider signing up to the Good Corporate Citizenship assessment process.

### **2 Commissioning for sustainability**

Work with the CSU to review best practice in contracting for sustainability and propose contractual changes with all providers reflecting best practice.

### **3 Work closely with partner organisations to promote sustainability in Bristol**

Agree an approach with Bristol City Council's Public Health Department to improve sustainability across Bristol, working with other large organisations in the city.

### **4 Promote sustainably with member practices**

Agree an approach with NHS England as to how sustainability can be promoted through their commissioning of primary care.