



Group Environmental Policy

YBS.POL.056

Document Type	For both internal and external use
Last Review Date	30/09/2016
Next Review Date	30/09/2017
Owner	Alison James, Property
Sponsor	Phil Kirtlan, Property
Version	Version 2.2
Approval Body	Society Matters Committee
Date of approval	31/03/2017



Contents

1. Purpose.....	3
2. Scope	3
3. Definitions	4
4. Policy Statements	4
5. Implementation.....	6
6. Monitoring	6
7. Approval.....	6
8. Roles & Responsibilities	7
9. Variations	9
10. Non-Compliance	9

Current approved version is available on the [intranet](#) and [our website](#).

Version	Status	Approved by	Date Approved	Comments / Changes made
V0.1	Draft April 2015			1 st draft
V0.2	Draft June 2015			Incorporated amendments to the policy temple
V0.3	Draft July 2015			Incorporated comments from walk around stakeholders in the RACI matrix
V0.4	Draft Aug 2015			Incorporating further comments from walk around stakeholders in the RACI matrix
V1.0	Approved Version 0.4	EMC September 2015		As version 0.4.
V1.1	Annual Review Aug 2016 draft	N/A	N/A	Amended by Property and reviewed by key stakeholders including: ITSD, Ops Risk and legal, and changes recommended including reformat with new template, and recommendation for approval pathway at Society Matters Committee
V2.0		Society Matters Committee		Changes per comments on V1.1 draft
V2.1				Changes per comments from Society Matters Committee meeting held 3.2.17
V2.2	Approved	Society Matters Committee		Changes per comments from Society Matters Committee meeting held 31.3.17



1. Purpose

We have a Group Environmental Policy to ensure that all colleagues and contractors understand their responsibility with respect to the protection of the environment, and conservation of resources.

We should do everything we can to ensure:

- YBS Group acts within the regulations set out to protect the environment
- Appropriate measures are taken to reduce or avoid emissions or discharges to the environment including those to air or water, and proper disposal of waste (including, municipal, chemical and hazardous wastes).
- Use of resources are undertaken in an efficient manner
- Appropriate permits and licenses for the disposal of waste, emissions to water etc., are maintained
- Arrangements are in place to protect the environment in case of an emergency event

2. Scope

This policy sets out the requirements of the Society and colleagues with regards to managing environmental matters. Adherence to the policy will not only ensure the Society and colleagues adhere to the legislative requirements set upon them, but will also create an environmentally efficient and healthy and safe working environment.

The Environmental Policy applies to all colleagues working for or on behalf of the YBS Group (Branches and Offices), and where applicable third party contractors. It covers all Group sites and business activities.

The requirements outlined in this Policy and supporting [Environmental Management Manual](#) (available on our Intranet only) must be understood and followed by all colleagues and contractors. They must work in conjunction with their managers and Property's Environmental and Sustainability Team, in all aspects of environmental management to ensure that controls and procedures are effectively implemented to ensure legal compliance and achievement of the Group's environmental objectives and targets.

Key environmental legislation that may impact on our business in England, Wales and Scotland include:

- Climate Change Act 2008
- CRC Energy Efficiency Scheme Order 2013 SI 1119
- The Waste (England and Wales) Regulations 2011 SI 988
- Environmental Protection Act 1990
- Environment Act 1995
- The Waste Electrical and Electronic Equipment Regulations 2006 SI 3289
- The Hazardous Waste (England and Wales) Regulations 2005 SI 894
- Climate Change (Scotland) Act 2009
- The Waste (Scotland) Regulations 2012
- Energy Savings Opportunity Scheme Regulations 2014



3. Definitions

- Air pollution - the introduction of inorganic or organic particulates, biological molecules, or other harmful gases into the Earth's atmosphere
- Carbon emissions - Direct or indirect emissions of carbon dioxide to the Earth's atmosphere arising from combustion of fuel, use of energy or release of gases with a global warming potential equivalent to that of carbon dioxide.
- Conservation of resources - Measures to reduce the consumption of resources including paper, electricity, gas, or other materials purchased through avoidance, substitution, replacement or repair (life extension of assets) etc.
- Discharges - May refer to accidental or intended release of chemical or other pollutants to drains, foul sewers, open water courses or bodies of water.
- Energy Use - Refers to all sources of fuel (diesel, petrol, LPG, gas coal etc.) used by the Group, and electricity consumption.
- Energy efficiency - A measure of the effectiveness of the use of energy as determined by the units of energy used per unit of output or other measure of business activity. Suitable indicators may include: Energy per FTE, energy per square foot of property, energy per TB of data stored, etc.
- Environmental aspects - An element or characteristic of an activity, product, or service that interacts or can interact with the environment. Environmental aspects may cause either positive or negative environmental impacts e.g. more or less energy use.
- Environmental management system standard (ISO14001) is one part of a larger management system, and is a set of interrelated or interacting elements that organisations use to implement their environmental policy, to achieve their environmental objectives, to meet their environmental compliance obligations, to address their environmental aspects and risks, and to manage their environmental threats and opportunities.
- Permits and licences - Refers to any permits or licences required for the disposal of waste, or discharges to drains or water etc.
- Stakeholders/interested parties - anyone who can affect, be affected by, or believe that they are affected by the environmental performance of the YBS Group
- Sustainable - a balanced consideration of the social, financial and environmental impacts associated with a business decision or activity.
- Waste - refers to materials that are conveyed at the end of their useful life from to a disposal facility such as a landfill, incinerator or recycling or other treatment facility.
- Water pollution - impact to natural or man-made water bodies, arising from the uncontrolled release of: chemicals, food residues, detergents, or particulates (e.g. soil, sand or other construction materials).



4. Policy Statements

At the Yorkshire Building Society Group we recognise that our activities have an impact on the environment. We have a responsibility to manage this impact, both for our members, and for the communities in which we operate. We are committed to continually improving our environmental performance in line with best practice and demonstrating leadership in environmental management, by:

- Evaluating our business activities to identify all significant environmental aspects and energy uses. Primary responsibility will rest with Property (Environmental Working Group) to carry out known plans in relation to key initiatives (water usage, energy savings, waste reduction, carbon offsets etc.).
- Annually setting targets and objectives in these areas to meet our environmental commitments e.g. reduction in energy use and associated carbon emissions. Property will strive to meet agreed targets using recognised MI from supply chain partners. Progress will be reported monthly and to relevant committees.
- Implementing systems to; measure, monitor and report on our performance in line with the relevant legislation and standards, and recognised best practice. Property will continue to utilise existing systems and identify improved monitoring and management through supply chain opportunities (Utilitywise engaged to assist). Legal will be expected to provide support in both the identification of and interpretation of newly formed legislation and what the wider impact such legislation may have on the Society. Whereby other key groups have a part to play in the achievement of our key targets they will show the necessary awareness and have the measures and controls to ensure goals are achieved (e.g. ITSD and the introduction of Nightwatchman as an energy saving initiative and efficiency awareness when going through their procurement process for high energy use equipment).
- Fostering awareness and engaging colleagues in the delivery of our environmental objectives, providing information on the issues involved, and support and resources. Property will lead on key initiatives and SLT will support through recognised communication channels to all colleagues.
- Reducing the amount of waste we generate, by avoiding, re-using and recycling, and disposing of all wastes in a legally compliant and environmentally responsible manner. Property will lead primarily through the introduction of effective communication/instructional means to further promote the environmental agenda.
- Considering the environmental performance of key suppliers. Incorporating sustainability into our procurement activities where possible to benefit the environment as and when contracts are reviewed and renewed. Property to closely align with Procurement to ensure a full adherence through the supply chain to our joint environmental goals. Please see latest [Procurement Policy](#) (available on our Intranet only) for more details.
- Complying with relevant legislation, and the requirements of stakeholders including; members, colleagues, regulators, suppliers, investors and others that may take an interest in our environmental performance.
- Communicating internally and externally our core environmental performance. Property to ensure adequate communication of key initiatives utilising Internal Comms to maximise the effectiveness of key initiatives.

The Society's Board and Management believe that this policy clearly reflects our commitment to operating in a sustainable and responsible manner. This policy and our associated performance is reviewed on an annual basis and updated as appropriate.



5. Implementation

This policy will be circulated to all stakeholders to be consulted prior to the first formal approval, and on any significant amendment. Where necessary, presentations/meetings will be held to discuss the content. Once the policy has been formally approved it will be posted to the intranet, and communications made to all stakeholders. Where necessary, targeted, training and information will be provided to support the launch of/changes to the policy.

Supporting information and guidance can be found on our [Intranet](#).

6. Monitoring

The approach broadly follows the approach set out in the ISO 14001 environmental management system standard, following a plan, do, check, act framework. The key elements are outlined below:

Planning: Setting out policy, conducting an environmental review and identification of environmental aspects associated with Group activities. Determination of significance of these environmental aspects in relation to legal requirements and setting of environmental management plans

Doing: Implementation of plans, training and communication

Checking: Reviewing progress and tracking performance against plans, reviewing the overall progress of the framework

Acting: Addressing findings of review and driving continual performance improvement.

Specific monitoring requirements and responsibilities are set out in the Group's [Environmental Management Manual](#) (available on our Intranet only).

In addition to the Policy Sponsor and Operational Risk and Internal Control, depending on the nature of the non-compliance, these will be reported to the Society Matters Committee, Legal and the relevant internal or contract stakeholders involved, and where necessary the relevant external agencies - local council, Environment Agency, Water Authority etc.

7. Approval

The Policy will be reviewed and re-approved annually by the Society Matters Committee.



8. Roles & Responsibilities

- R = Responsible = The colleague who does the work.
- A = Accountable = The colleague who signs off the activity being completed. Note each column needs an “A”.
- C = Consulted = Anyone who should be involved in discussions and whose views should be listened to, prior to a decision being made and/or the task being completed.
- I = Informed = Anyone who must be told when a decision is made or work is completed.

Please note the responsibilities, accountabilities, consultation and informed aspects are summarised in further detail below.

Who	Develop & Maintain policy	Communicate the policy	Monitor adherence to policy	Manage policy Dispensations	Endorse the Policy	Gain policy Approval	Comply with Policy
Policy Owner, Alison James, Energy and Environment Coordinator	R	R	R	R	A	R	A
Policy Sponsor, Phil Kirtlan, Head of Property	A	A	A	A	R	A	R
Senior Leadership Team	C	-	I	-	-	-	R
Society Matters Committee	-	I	C	I	I	-	R
Environment Working Group	C	I	C	C	C	-	R
Procurement	-	-	C	C	C	-	C
Legal	-	-	C	-	I	C	R
Office Colleagues							R
Branch Colleagues	C	-	-	-	-	-	R

Key RACI Tasks

Policy Owner

The Policy owner is responsible for:

- Writing the policy document and ensuring that it remains up to date at all times.
- Reviewing the policy periodically and in the event of any significant change (e.g. legislative, regulatory, organisational, operational etc.).
- Seeking approval / reapproval from the Policy Sponsor and the relevant governance committee.
- Communicating the policy to all affected colleagues, ensuring that adequate supporting training is developed and delivered as required.
- Monitoring the application of the policy and escalating to the Policy Sponsor and ORIC any breach in policy.



- Notifying the Divisional Head of Risk in respect of any policy dispensations with a potential impact <£500k. Notifying ORIC in respect of any policy dispensation with a potential impact >= £500k (N.B. a formal risk tolerance may be required).
- Act as contact point for recording non-day to day issues (innovation, policy clarification, complaints etc.) Contact via telephone 01274 472385, mobile 07872100392 email amjames@ybs.co.uk.

Policy Sponsor

The Policy sponsor is accountable for all aspects of the policy. The Policy sponsor is responsible for:

- Providing direction to the Policy owner as required.
- Supporting the Policy owner in discharging their responsibilities, specifically ensuring sufficient investment is made available to enable implementation and monitoring of policy adherence.
- Endorsing the Policy prior to it being submitted to the relevant governance committee for approval.

Senior Leadership Team

- Take proactive measures in supporting the communication of environmental goals and aspirations of the Group.
- Take a lead role in identifying and sharing opportunities specific to their own functions and facilitating the means through appropriate route to achieve the Society's joint goals.
- Offer feedback/ideas to further forward our environmental agenda through the Society Matters Committee.

Society Matters Committee

- Oversight of adherence to environmental policy and procedure offering feedback and guidance to Environmental Working Group.

Environment Working Group (Property)

- Ensure appropriate control measures are in place to comply with and develop environmental policy and agreed procedures.
- Ensure that resources available are spread effectively to plan and carry out key measures and manage risk.
- Record actions against key tasks and target measures enabling full reporting to appropriate committees.

Procurement

- Procurement Policy to ensure that key suppliers conform and contribute to the key goals and objectives of the YBS environmental policy.
- Procurement Policy to clearly reference environmental requirements and aspirations.

Office Colleagues

- All colleagues must adhere to the requirements and duties placed upon them by the policy.
- Take proactive measures to prevent unnecessary use of energy (lights off, temperature controls down, single flush, waste recycling, travel initiatives etc.) having general awareness of any environmental opportunities.
- Policy makers should consult with key office stakeholders (wider FM team).



Branch Colleagues

- Adhere to the requirements and duties placed upon them by the policy.
- Take proactive measures to prevent unnecessary use of energy (lights off, temperature controls down, single flush, waste recycling etc.) take general awareness of energy saving opportunities.
- Provide co-ordinated feedback via branch management structures to environmental committee through appropriate reporting mechanisms.
- Policy makers should consult with key branch stakeholders (regional management, performance management).

9. Variations

This policy must be followed by colleagues and contractors at all times when on Group premises. Any exceptions to this policy must be approved via the Environmental and Sustainability Team, and agreed at the Society Matters Committee.

There are currently no formal exceptions to this policy or any planned policy exceptions.

10. Non-Compliance

Breaches of the Group Energy and Environmental policy, is a disciplinary offence. Depending on the nature and extent of the breach, they may also be subject to further legal sanctions including: fines and imprisonment.