Policy context and external drivers

Within this appendix, we review the policy environment that guides the development of the STAP; the relevant external policy drivers exerting influence on NSS to address business and commute travel issues, as well as relevant internal NSS policies that can potentially impact on travel decisions.

For the NSS internal policies, we have provided comment on the strengths and weaknesses of each of them in relation to the promotion of sustainable travel, and make recommendations for improvement where appropriate.

External policies

Good Corporate Citizenship Assessment Model (GCCAM)

GCCAM is a toolkit for NHS organisations to benchmark their performance against a number of sustainable development-related activities. It is intended to help them better understand how to consider and better improve sustainability across all areas of their organisation. Furthermore it is now mandatory that NHS bodies undertake GCCAM assessment in line with the objectives of the Policy on Sustainable Development for NHSScotland 2012, discussed below.

There are six overarching priorities for action: Travel, Procurement, Facilities Management, Workforce, Community Engagement and Buildings. Of relevance to this STAP, NSS has undertaken a self assessment of its operations under the Travel category. There are a number of areas for assessment within this category. These are:

- Policies and performance;
- Area planning;
- Service delivery and estates design;
- Active travel;
- Business travel; and
- Traffic management.

Based on the self-assessment, the organisation receives an overall score between 0 and 9 for each sub-area referred to above, with 0 being very little action and 9 highlighting where the organisation is doing well. The results provided by NSS show that whilst it scores well (7) under the ‘Policies and performance’ area, it does less so on the other areas, with scores of 1 for business travel and 2 for active travel, and scores of 1 or 2 for the remaining categories.

This has helped NSS to understand how it currently performs in relation to transport and travel, and demonstrates that travel is an area that requires attention for the organisation, which the STAP can help provide a focus for.


The Policy is intended to improve the sustainability of NHSScotland’s activities related to estates, property and asset management, however NHSScotland bodies are expected to address the six key areas of activity within GCCAM described above.

There are several mandatory requirements of the policy that apply to all NHSScotland bodies. Key requirements include:

- The appointment of a Champion for Sustainability who must be a board member;
- The appointment of an Environmental Management Representative and Waste Management Officer;
- The development of a SDAP which must be reviewed to monitor, evaluate and update actions related to the six key areas of activity, and which must be signed off annually by the Chief Executive and Champion;
- The requirement to conduct the GCCAM self-assessment to understand progress.

NSS has developed its proposed SDAP which was presented for formal Board approval on 2 November 2012. This includes actions related to development of the STAP.

Sustainable Development Strategy for NHSScotland 2012

This strategy has been developed with the purpose of interpreting and providing clear guidance on meeting each of the mandatory requirements of CEL 2 (2012). It replaces the ‘Sustainable Development Strategy for NHSScotland’ CEL15 (2009).

Under the Travel category, it provides a list of example actions for NHSScotland bodies to improve their performance, including:

- Compile, understand and utilise carbon footprint data from business travel;
- Promote a travel hierarchy, and reduce the need to travel;
- Plan layouts and services with travel in mind;
- Publish information (on travel options);
- Use fiscal incentives (such as cycle to work schemes);
- Support fuel efficient driving;
- Improve the efficiency of all vehicles; and
- Lead by example.
The STAP forms part of NSS’s SDAP. Many of the recommendations within the STAP are related to those within the Strategy listed above. This provides confidence that the development and implementation of this STAP will help NSS to meet its obligations under the overarching Policy.

**Scottish Sustainable Procurement Action Plan**

In October 2009, the Scottish Government issued a ten-step Sustainable Procurement Action Plan to assist the public sector to embed sustainable procurement into their operations, to fully account for sustainability in procurement activity and be able to provide evidence of they are achieving this.

This includes consideration of the social, economic and environmental impacts of procurement decisions and whole life costing including design, materials, operation costs, energy consumption, waste and recycling options.

NSS National Procurement (NP) aims through one of its seven strategic objectives to actively develop a long term sustainability policy aligned to GCCAM and the Scottish Procurement Action Plan.

**Climate Change (Scotland) Act**

The Climate Change (Scotland) Act 2009 set ambitious targets for Scotland to reduce its impact on climate change, with an interim target of a 42% reduction in greenhouse gas emissions by 2020 and an 80% reduction by 2050.

The Act places three main duties on public bodies, as summarised below:

1. Public bodies must act in the way best calculated to reduce greenhouse gas emissions to contribute to delivery of climate change targets (mitigation);

2. Public bodies must act in the way best calculated to deliver any statutory adaptation programme. The first such programme is not expected until 2013, but public bodies are advised to consider their approach to adaptation now; and

3. Public bodies to act in a way considered most sustainable, accounting for social, economic and environmental aspects over the short and long term, alongside the impact on GHG emissions, by devising procedures for sustainability proofing or assessing the sustainability of policy decisions and strategies.

All of NHSScotland’s fourteen territorial Boards and eight special Boards are currently considered to be ‘major players’ with respect to the public body climate change duties, owing to their large estate and staff numbers. NSS has developed its Carbon Management Plan which sets out how it will measure and manage the carbon emissions associated with the day-to-day running of the organisation.

The STAP will help provide greater focus to NSS of reducing carbon emissions from business and commute travel, and thereby contribute towards the Carbon Management Plan and hence fulfilling its duties under the Act.

**HEAT Targets**

The Scottish Government agrees a suite of national NHS performance targets known as HEAT (Health, Efficiency, Access and Treatment) Targets on an annual basis. NHS Boards and the
Scottish Government monitor Boards’ performance against the national targets, which are grouped into four priorities:

- Health Improvement for the people of Scotland - improving life expectancy and healthy life expectancy;
- Efficiency and Governance Improvements - continually improve the efficiency and effectiveness of the NHS;
- Access to Services - recognising patients' need for quicker and easier use of NHS services; and
- Treatment Appropriate to Individuals - ensure patients receive high quality services that meet their needs.

Of particular relevance to the STAP is the HEAT target which commits NSS to reducing energy-based carbon emissions by 3% each year. NSS has committed to reducing carbon emissions by 20% by 2014/15 (from a 2007/08 baseline). The target is primarily related to energy use (electricity and gas in buildings) although fleet travel is also included.

**CEL 2008_38 Car Park Charging at NHSScotland Healthcare Sites**

This policy confirmed the Scottish Government commitment to ending car park charging at healthcare facilities in Scotland (excluding PFI-managed car parks). Within the policy statement, NHS Boards were asked to clarify:

- How they would manage their car parks once the end of charging came into effect;
- How they would address the potential increase in demand; and
- How potential use of spaces by other users would be managed.

The policy letter advised that further guidance on car park management tools would be available from Health Facilities Scotland and that a seminar on car park management solutions would be convened for all NHS Boards.

**Internal policies – travel-related**

**NHS Terms and conditions of service handbook**

The handbook sets out what staff are entitled to when claiming for mileage and other subsistence in association with travelling for business purposes. As the allowances apply to all NHSScotland staff and therefore set externally, there is limited flexibility in what changes can be made, although the handbook does recognise that local arrangements can be made.

**Review of the reimbursement of travel expenses 2010**

NHS is currently undergoing a review aimed to deliver a national system for reimbursement that will replace the existing system of payments and allowances. From 1 July 2013 it is proposed that a simpler system is introduced based on a single standard rate of reimbursement up to a maximum annual mileage after which the rate changes.
The distinction between “regular” and “standard” car users would be removed and there would be no reference to engine size. All drivers, irrespective of the frequency of their journeys and the vehicle they drive, would receive the same rate of reimbursement. It is proposed that the new system for calculating reimbursement is based on the standard and running costs of a mid-range price and size car, based on the AA guides; the reimbursement rate will be reviewed twice per year.

There will be an increase in the reimbursement rate for cycle mileage to 20 pence per mile, from the current rate of 10 pence per mile.

One of the policies that complements the objectives of the STAP is availability of an interest free loan scheme that helps employees to purchase an annual public transport season ticket, with repayments taken monthly via the employee’s salary. Whilst season tickets are primarily used for commute travel, it is recommended that staff are encouraged (they are currently are not) within the policy document to also use their season ticket for business travel journeys.

It is not clear within the document whether the interest free loan scheme is available for both bus and rail travel. This should be made clear to staff, as should the procedure that staff need to follow to apply for the scheme. Currently the guidance states that [staff] “should complete the CSA Season Ticket Loan Request Form” but with no further information on how and where to source this application form from (it is understood from comments provided by the HR team that documentation and forms are located on the Finance section of the NSS intranet system).

The policy was last updated in 2004 and therefore it is recommended that all of the information provided in the ‘Travel Operators Procedures and Contact Details’ section is checked and revised as necessary. There is evidence that some of the information requires updating, as an example:

- Many of the web hyperlinks in the document are broken;
- The document relates to NSS securing an 8% discount, as of 2004, on the cost of a One Ticket season ticket (this needs checking to clarify if this discount still applies);
- The cost of Lothian Buses annual season ticket is now £612 instead of £396;
- GNER is now East Coast Trains.

Car Leasing Policy (currently draft)
It is understood that this policy will be sent to NSS Partnership Forum in October 2012 for endorsement, following which the policy will be approved by the Chair of the Staff Governance Committee.

The policy identifies the key working and contractual arrangements surrounding lease cars. Lease cars are provided to staff who have a need to drive during the working day for business purposes. An application for a leased car must be made on the recommendation of the individual’s line manager and approved by appropriate Director. In order to qualify for a car, the application must fulfil the following criteria:

- Be in the interests of the service;
- The employee requires to be mobile;
- Have an estimated minimum business mileage of 5,000 miles per annum

It is recognised that the achievement of 5,000 business miles may not always be possible, but the other two criteria remain. In such cases, Directors will be required to submit a business justification to the HR Director, who must also approve the application.

It is noted that the policy includes a commitment to minimising NSS’s carbon footprint, with all new lease vehicles required to not exceed 140 grams CO₂; this will work with other NSS carbon reduction policies to ensure that reduced carbon emissions result from the vehicles, without massively restricting staff car choice.

As the car in effect ‘belongs’ to NSS, it is a core requirement that the vehicle is “available at all times for use by the employee in the performance of the employee’s official duties”. Whilst the reasons for this policy are understandable, this will perversely encourage staff to utilise the car for the commute, even on days when the vehicle is not otherwise required. Consideration should be given to encouraging staff to use alternative forms of transport in accordance with the mode hierarchy.

**Work Related Driving Risk Policy 2010 and Work Related Road Risk Handbook**

The Work-Related Driving Risk Policy reviews the risks that may be experienced by staff whilst travelled on company business. The policy aims to protect staff so far as is reasonably practicable from all work-related road risks associated with work-related driving.

Various assessments are required prior to a journey taking place, including risk assessments and roadworthiness checks. Risk assessments are noted to be carried out annually, or sooner if circumstances change. The policy also notes that drivers should carry out vehicle checks before beginning any journey. However there is no mention of completion of a form to provide evidence of the vehicle check having taken place, or the procedures in place for checking that staff are doing so. Providing a standard form to staff, and requiring the return of the form after each journey, is recommended to ensure that this practice is taking place.

The Corporate Manslaughter Act and Corporate Homicide Act 2007 are not mentioned within the document; the documents should be reviewed and referenced in the appropriate places.

Links within the document should be checked; the satellite navigation link in particular.

Form NSS IRI form is referenced for accident reporting; this document should be appended to the policy in addition to the risk assessment to ensure that staff can easily access it if required.

The Work-Related Road Risk Handbook identifies further risks, statistics relating to vehicle use and good practice in relation to the use of vehicles for work-related and other travel. The document notes that all journeys should be carefully planned, and consideration given to the use of public transport for at least part of the journey, or car sharing. Guidance on how vehicles and bicycles should share the road is also provided.

The document identifies the need for a risk assessment before undertaking journeys; it suggests development of a safety checklist for the vehicle, to be completed on a regular basis. It is
recommended that the safety checklist is developed and issued to all staff for completion before every journey, to ensure that the vehicle is roadworthy prior to setting off.

**Car parking arrangements for Gyle Square**

In 2010, NSS undertook a review of car parking at Gyle Square and its associated car park ‘No 10’ Gyle Crescent to address over-capacity issues and to ensure that car parking is allocated on a fair and equitable basis. One of the main changes was for the provision of a pass to be allocated on a needs basis, using a set of weighting and eligibility criteria.

These criteria include carer responsibilities, business need, car share and excessive travel time with the first two criteria attracting a higher level of points. Applications made by staff are considered at a senior level by the Director of Strategy and Support along with a staff representative.

**Internal policies – general**

**NSS 2010-2015 Environmental Strategy**

The Sustainable Development Strategy for NHSScotland (CEL15 (2009)), which has now been superseded by the 2012 version discussed above, required all NHSScotland bodies to develop actions to address sustainable development.

The NSS Environmental Strategy 2010 – 2015 was NSS’s response to the 2009 Strategy, as well as HDL (2006) 21 ‘Environmental Management Policy for NHSScotland’, and as such has largely been replaced in line with the requirements of the 2012 Policy discussed above.

The Environmental Strategy included an action to support the development of an NSS-wide travel plan which promotes the use of sustainable travel, based on the work being undertaken at that time on travel planning as part of the Glasgow office consolidation process.

The Strategy recognised that there was insufficient data to be able to calculate carbon emissions from fleet, business travel and commute travel. As such, it proposed the following key actions:

- Complete an NSS wide travel survey;
- Establish monitoring systems for each area of travel;
- Introduce phased programmes for business travel and fleet designed to reduce the need to travel and travel based carbon emissions; and
- Design sustainable travel plans for all staff and visitors aimed at increasing environmental efficiency, reducing emissions and educating, supporting and encouraging staff to make more sustainable travel choices.

Therefore, the STAP strongly supports previous, as well as current policy and strategy to reduce the carbon and cost impact of business and commute travel.
**Flexi-Time and Flexible Working Policy (2006)**

A policy framework and guidance document exists in relation to flexible working. The policy acknowledges that divisions have their own local arrangements and is there to provide general guidance.

Some of the potential benefits of flexible working for both NSS as an organisation and for its staff are set out within the policy and associated guidelines. Benefits stated include better work-life balance, improved recruitment and retention, improved staff productivity and avoiding the need to travel at peak times. However, there is no mention of the potential for a flexible approach to reduce the environmental impact, expenditure and duty of care risks associated with business travel.

The policy acknowledges that flexible working should be carefully managed to prevent detrimental impacts on the business, for example through loss of office cover if staff leave the office at a certain time, or are not in the office on Mondays or Fridays.

**Working at Home and Working from Home Policy (2002)**

It is understood that this policy is currently being reviewed and will be discussed at the NSS Policy Review Group in the near future. A policy on working at and from home is welcomed in terms of the specific work-life balance benefits that it can offer staff. Evidence from other organisations demonstrates the productivity benefits of having such policies.

The policy mentions the benefit of home working on reducing energy consumption and pollution from unnecessary car journeys, however it would benefit from explicitly highlighting the employee and organisational benefits through reduced business and commute travel journeys.

**Information Management & Technology Strategy 2012-2017**

The IMT strategy summarises the key objectives and actions to take place over the coming years, aiming to link up with the NHSScotland eHealth Strategy 2011-2017 with an aim of improving quality and reducing costs.

The document includes a vision statement, identifies the drivers for change, the scope of the work and a delivery plan.

The document states an intention to improve capability to effectively support business change, and to fully exploit web and emerging technologies to support service delivery. The document also states support for flexible working. Consideration has therefore been given to reducing the demand for travel (although not explicit in the document), and encouraging the use of technology as an alternative; this should be further developed to provide clear guidance to staff on the permissible options available to them in place of travelling, for example, including working from home, tele-conferencing etc.


The Procurement Strategy sets out the work required to meet the expectations of customers, whilst aiming to ensure continuous improvement to current practices. The document identifies the key changes required, with regard to performance, governance, resources, collaboration and sourcing.
The policy notes that procurement activities may affect the environment, and that NSS are committed to reducing the negative effect on the environment of purchased products and services. Reference to carbon emissions resulting from the provision of goods and services is omitted from the document. It is recommended that consideration be given to the inclusion of the carbon-related aims and actions within the strategy, to ensure that all NSS activities are noted and monitored.

The Procurement Manual provides an all-encompassing guidance document for purchase of all goods and services, covering all funding and expenditure types. The document includes aims to modernise working practices, increase efficiency and ensure quality and innovation.

The document notes that economic, social and environmental issues are incorporated into the NSS procurement process, where they offer value for money, comply with legislative and regulatory requirements and are directly related to the subject matter. One of the roles of the procurement function across NSS is to ‘support sustainable policies...and environmental strategies’; the procurement officer is also charged with ‘ensuring that the organisation’s strategy and/or policies on corporate social responsibility/sustainability are adhered to’.

The document excludes mention of carbon emissions resulting from the purchase of goods and services, although does state that the whole life cycle of goods (cradle to grave) is of relevance to NSS.