

Document Management Title of document	MHG04 – Environmental Group Policy
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Target audience	All employees of the Millbrook Healthcare Group
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Department	Governance Department
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Approved by	Executive Committee
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1 Purpose

- 1.1 The purpose of this Group Policy is to describe the framework that Millbrook Healthcare have in place to ensure environmental impacts, including pollution prevention are identified, their impacts on the environment are minimised, and to ensure compliance with ISO14001 and all relevant Legislation.
- 1.2 Context of the Organisation
- 1.2.1 Millbrook Healthcare Holdings Ltd is a national service provider to the NHS and Local Authorities for community equipment services, wheelchairs, telecare installation & monitoring and home improvement services. The core business processes of the organisation, which are undertaken by separate Divisions within the organisation are as follows:
- 1.2.2 Community Equipment & Wheelchair Services undertake the storage, delivery, repair, collection, decontamination, refurbishment and (limited) prescribing of wheelchairs and community equipment such as pressure relieving mattresses and beds, bath seats, hoists and slings, walking frames, grab rails, bed raisers as well as other aids for daily living.
- 1.2.3 Home Improvement Agency undertakes the improvement of service users' properties by modifying rooms, building extensions, installing bathroom facilities, supplying access ramps, etc.
- 1.2.4 Telecare installation and monitoring are undertaken by Livity Life Ltd, a Division of Millbrook Healthcare Holdings Ltd
- 1.3 Millbrook Healthcare Board are fully committed to ensuring that the Environmental Management System (EMS) contained within this policy is integrated into the organisation's business processes and that a culture of continuous improvement is embedded throughout in accordance with the requirements of BS EN ISO 14001:2015 and our Objectives.

2 Scope

- 2.1 Terms are defined in the definitions section of the Appendix to this Policy.
- 2.2 This Policy applies to all Colleagues, regardless of their job role and all activities of the Group, regardless of the Division.
- 2.3 This Group Policy applies to all Divisions, regardless of Divisional ISO Certifications held.
- 2.4 Within Millbrook Healthcare Holdings Ltd a number of ISO Certifications are held by individual Divisions, each with their own scope (see Appendix C):
- 2.4.1 “**Storage, delivery, collection & cleaning of Community Equipment (Equipment to assist with toileting, mobilising & pressure care)**” – applies to Certification to ISO9001 held by Millbrook Healthcare (CES)

- 2.4.2 **“Procurement, assessment, installation, maintenance, decontamination, recycling and monitoring of assistive technology. Retail subscriptions of assistive technology, equipment supply and monitoring”** applies to Certification to ISO9001 held by Livity Life.
- 2.4.3 **“Storage, delivery, collection installation & cleaning of Community Equipment (equipment to assist with toileting, mobilising & pressure care) including Home Improvement Agency (HIA) activities”** – applies to ISO45001 certification held by several CES & HIA sites
- 2.4.4 **“Storage, delivery, collection installation & cleaning of Community Equipment (equipment to assist with toileting, mobilising & pressure care) including Home Improvement Agency (HIA) activities”** – applies to ISO14001 certification held by several CES & HIA sites

2.5 Exclusions applicable to ISO certification:

- 2.5.1 Exclusions – any activity not specifically noted on the activities (in section 2.4) or any site listed in the Appendix C is excluded from this Scope.
- 2.5.2 Applicable specific exclusions:
 - 2.5.2.1 the clinical aspect of prescribing Community Equipment (aka Trusted Assessors).
 - 2.5.2.2 the supply, delivery, collection, cleaning, repair or prescribing of wheelchairs
 - 2.5.2.3 activities undertaken by any other Division within the Millbrook Healthcare Holdings Ltd (e.g. the manufacture of Medical Devices) or the supply of services under another company/Division.

3 Responsibilities

- 3.1 CEO- has overall responsibility and authority to ensure that the Environmental Management System (EMS) is established, implemented, maintained and continually improved within the organisation. This will be achieved by:
 - 3.1.1 attending annual management review meetings
 - 3.1.2 Providing the necessary authorities within Millbrook Healthcare Holdings Ltd to ensure that all aspects of this Group Policy are implemented
 - 3.1.3 Ensuring that all relevant Directors and Managers within Millbrook Healthcare Holdings Ltd engage with the Environmental Management Systems and carry out their duties as described in this Group Policy.
- 3.2 Individual Directors are responsible and authorised to ensure that the Environmental Management Systems are fully understood and adhered to by those employed within their directorates. They must also review progress against service specific business and quality objectives and escalate any unforeseen risks and opportunities to their direct line manager for review.

3.3 Managers are responsible and for ensuring that the EMS is fully understood and adhered to by any employees they manage. They must also ensure that any unforeseen risks and opportunities relating to business or environmental objectives are escalated to their directors

3.4 Health, Safety & Environmental (SHEQ) Manager- is the designated management representative and:

3.4.1 Is responsible for and authorised to provide a comprehensive EMS for the organisation.

3.4.2 They will also review and update this policy and ensure the annual management review meeting takes place in accordance with the requirements of this policy.

3.4.3 They will ensure that a robust internal audit process exists for measuring compliance with the EMS and environmental objectives and that the findings and remedial actions are actioned and reported on.

3.5 Employees are responsible for follow company Policies, sub-policies, and other documented instructions (e.g. SOPs). They must be involved and engaged in decision making if changes need to take place.

3.6 Staff, Visitors and Contractors are responsible for ensuring that they fully comply with the company's Policies and sub-policies and other documented instructions (e.g. SOPs), that they undertake reasonable actions to mitigate or eliminate any risks which may adversely affect the attainment of any business or environmental objectives. They are also required undertake any relevant environmental training provided by the organisation.

4 Policy Statement

4.1 The Company is committed to minimising its impact on the environment and maintaining sustainable products and services in its business undertakings. This is undertaken by establishing, implementing, and maintaining an Environmental Management System.

5 Policy

5.1 The Environmental Management System is aimed at satisfying the requirements of BS EN ISO 14001:2015 and maintaining our commitment and accreditation to environmental initiatives and it is the Company's firm resolve to comply with applicable statutory requirements.

5.2 The principal elements of this policy are to:

5.2.1 Reduce waste and prevent pollution. Eliminate, Reduce, Reuse, Recycle

5.2.2 Use renewable or recyclable resources or reduce use of natural resources.

5.2.3 Include environmental consideration in procurement and investment decisions.

- 5.2.4 Comply with legislation and other requirements; and continually improve environmental performance.
 - 5.2.5 Continually review the Company's operations to identify the significant environmental aspects and impacts of the Company's products and services that can be controlled and those that can be influenced within the defined scope of Environmental Management System.
 - 5.2.6 Identify and comply with applicable legislation.
 - 5.2.7 Review lessons learnt from any environmental incidents.
 - 5.2.8 Establish and maintain an infrastructure capable of supporting this policy and its associated objectives and targets.
 - 5.2.9 Maintain the best possible understanding of the environmental aspects and impacts associated with our products and services by undertaking an aspect and impacts assessment for each area of the business and incorporating a life cycle perspective
 - 5.2.10 Provide environmental objectives and targets (SMART) and review them on a regular basis. Climate change will be considered within all SMART objectives and targets.
 - 5.2.11 Undertake system monitoring, internal audits and management reviews, to ensure the integrity of the system is maintained and continually improved.
 - 5.2.12 Ensure that access to authoritative information relating to the Environmental Management System is available and up to date. Such information will be used to understand the relationships between legislation and aspects and ensure the effective design of controls including training and procedures.
 - 5.2.13 Provide employee communication and understanding through training and continual updates relating the aspects resister and company objectives and targets for environmental management.
 - 5.2.14 Consider social responsibility and manage the impact that the company makes on the local economy and social life. These include supporting the local economy, supporting other economic regions and communities and charity support.
- 5.3 This Policy is communicated to all persons working under its control, with the intent that they are made aware of their individual obligations. All persons working under its control should also refer to the company's supporting Policy for Health, Safety. It is the direct concern of all employees, and all levels of hierarchy are accountable to the CEO for its implementation. The company will encourage open debate, input, and suggestion for environmental performance.
- 5.4 This Policy and associated arrangements will be reviewed at least annually and revised as necessary to reflect changes to the business activities and legislation. Any such changes will be brought to the attention of all stakeholders and interested parties. This policy will be audited to ensure that it remains relevant and appropriate to the Company.

5.5 A copy of this policy is available to all colleagues via AssessNET, as well as its website, and available to any interested parties on request.

6 Measurement and Reporting

6.1 Monitoring of compliance to this Policy ensures that the company achieves its objectives and targets

6.2 Reporting metrics include:

6.2.1 The monitoring, measuring, analysis and evaluation of the organisation's environmental performance – This is primarily conducted with regard to the quantitative and qualitative measures in place for local and organisational KPIs.

6.2.2 the monitoring and measuring of activities, frequency, target date, target, location of information, status and responsibility.

6.2.3 An annual review will also be undertaken at the Management Review Meeting.

6.3 Calibrated or verified monitoring and measuring equipment, where used, will be maintained and documented. Non-calibrated equipment may be used to give an indicative reading and will be verified by calibrated equipment.

Appendix A – List of Sub Policies

Group Sub Policy Ref	Group Sub Policy Name	Owner
MHG04.01	Waste Segregation and Management Group sub-Policy	SHEQ Manager
MHG04.03	Environmental and sustainability Statement	SHEQ Manager
MHG04.04	Biodiversity Statement	SHEQ Manager

Appendix B – Definitions

In addition to the Word Document “Group Policy Definitions.doc” which includes the definitions inherited by this Policy from the Group Policy MHG00 – Governance and Policy Management, the following definitions apply to this Policy:

Term	Definition
Environment:	surroundings in which Millbrook Healthcare Limited operates, including air, water, land, natural resources, flora, fauna, humans and their interrelationships.
Environmental Aspect:	any element of Millbrook Healthcare Limited activities, products or services that interacts or can interact with the environment.
Internal and External Issues	positive and negative factors which are relevant to the organisation. The organization shall consider climate change from both the company (internal /external) and interested parties' points of view.
Risk and Opportunities	potential adverse effects and potential beneficial effects.
Interested Party	person or organisation that can affect, be affected by or perceive itself to be affected by a decision or activity from Millbrook Healthcare Limited

Appendix C – Certification matrix

Service Name	Address	Legal Entity	9001	14001	45001
Head Office	Nutsey Lane, Calmore Industrial Park, Totton Hants, SO40 3XJ	Millbrook Healthcare Group Ltd	Yes	Yes	Yes
Devon (Exeter) CES	Units 5, Hill Barton Business Park, 8 Jacks Way, Clyst St Mary, Exeter EX5 1FG	Millbrook Healthcare Ltd	Yes	No	Yes
East Sussex (Hailsham) CES	14a, Apex Park, Diplocks Way, Hailsham BN27 3JU	Millbrook Healthcare Ltd	Yes	Yes	Yes
Surrey CES	Block 8, Henley Business Park, Pirbright Road, Normandy, Guildford GU3 2DX	Millbrook Healthcare Ltd	Yes	No	Yes
Northamptonshire CES	9a N Portway Cl, Round Spinney Industrial Estate, Northampton NN3 8RQ	Millbrook Healthcare Ltd	Yes	Yes	Yes
Ceiling Track Hoist (Oxford) CTH	Unit 15, Blacklands Way, Abingdon, Oxfordshire, OX14 1DY	Millbrook Healthcare Ltd	No	No	Yes
Blandford HIA	Millennium House, 2A Sunrise Business Park, Higher Shaftesbury Road, Blandford Forum DT11 8ST	Millbrook Healthcare Ltd	No	yes	Yes
Liverpool TEC	Unit 2 Dakota Business, Park Skyhawk Avenue L19 2QR	Livity Life Ltd	Yes	No	No
Cheshire TEC	Unit 7 Artis Park, Road One, Winsford, CW7 3SE	Livity Life Ltd	Yes	No	No
Worcester TEC	Worcester 2nd floor Attwood House Perdiswell Park, Worcester, WR3 7NS	Livity Life Ltd	Yes	No	Yes
Essex TEC	Unit 18, 4 Cromer Way, Chelmsford, Essex CM1 2GL	Livity Life Ltd	yes	No	No
Hackney TEC	Unit 3 Water House, 8 Orsman Road, London N1 5QJ	Livity Life Ltd	Yes	No	Yes

Appendix D – Issues Matrix

External Issues

The following external issues and how they potentially impact the Management Systems have been identified:

Factor	Issue	Potential Impact
Political	<ul style="list-style-type: none"> • general election • local elections • Global tariff changes 	<ul style="list-style-type: none"> – instability due to purdah/hung parliament. – changes to local government social care models affecting contract requirements – uncertainty affecting trade and material costs resulting in product shortages/price increases
Economic	<ul style="list-style-type: none"> • exchange rates • inflation • interest rates • fuel prices • tax/VAT changes • increase in National Insurance contributions 	<ul style="list-style-type: none"> – increase/decrease in overseas product prices – increase/decrease in operating costs – increase/decrease in cash flow – increase/decrease in transportation costs – increase/decrease in operating costs
Social	<ul style="list-style-type: none"> • employment rate • EU workers' rights • social media 	<ul style="list-style-type: none"> – ability to recruit new staff – shortages in existing staff – positive/negative effect on organisational reputation, recruitment, staff retention
Technological	<ul style="list-style-type: none"> • new products • loss of third-party IT providers • software updates 	<ul style="list-style-type: none"> – replacement costs for older products – inability to undertake automated processes – upgrade costs for new software
Legal	<ul style="list-style-type: none"> • new legislation or regulations • employment law 	<ul style="list-style-type: none"> – changes to operating procedures/compliance measures – staff costs, changes to working practices
Quality	<ul style="list-style-type: none"> • adverse weather • product life cycles 	<ul style="list-style-type: none"> – staff attendance, hospital discharge rates – reduction in carbon footprint/replacement costs, increased revenue from servicing
Competition	<ul style="list-style-type: none"> • market share • new markets 	<ul style="list-style-type: none"> – increase/decrease in staff, buildings, vehicles – increase in staff, buildings, vehicles
Environmental	<ul style="list-style-type: none"> • Adverse weather • Product lifecycles • Change in climate 	<ul style="list-style-type: none"> – Staff attendance, hospital discharge rates – Reduction in carbon footprint/replacement costs, increase revenue from servicing – Effects of adverse weather impacting deliveries – Extremes of temperature – Storms – flooding

Internal Issues

The following internal issues and how they potentially impact the Management Systems have been identified:

Factor	Issue	Potential Impact
Human Resources	<ul style="list-style-type: none"> • staff retention • recruitment • TUPE staff • training 	<ul style="list-style-type: none"> – business continuity, knowledge loss, workforce morale, succession planning – recruitment time/costs – implementation time/costs – staff costs/time, delivery methods, relevance
Physical Resources	<ul style="list-style-type: none"> • buildings • equipment • vehicles • IT infrastructure 	<ul style="list-style-type: none"> – maintenance costs – replacement/servicing costs – replacement/servicing costs – replacement/upgrade costs
Financial	<ul style="list-style-type: none"> • staff costs • income • cash flow 	<ul style="list-style-type: none"> – annual pay increase – loss/gain of contracts – new project costs
Governance	<ul style="list-style-type: none"> • compliance • incidents 	<ul style="list-style-type: none"> – loss of ISO accreditation, internal audit, external audit/scrutiny, change in Scope – investigations, learning outcomes

Appendix E – Revision History

Version Number	Reason for Change	Description of Change	Date of Change	Author
14		<ul style="list-style-type: none"> • Policy review • New template applied • Re-titled (from IMO14) 	05/11/2025	M. Latchford