Since publishing on 6 March 2024, we were made aware of a miscalculation in our past carbon emissions which resulted in them being overstated. This has been corrected as of 26 April 2024 and will ensure that the baseline for future updates is more accurate.

Nursing & Midwifery Council

Environmental Sustainability Plan

April 2024

Developed in partnership with

The PSC

Contents

Glossary of terms

Term	Definition
BREEAM	The world's leading science-based suite of validation and certification systems for sustainable buildings.
Carbon dioxide equivalent	A metric measure used to compare the emissions from various greenhouse gases by converting amounts of other gases to the equivalent amount of carbon dioxide with the same global warming potential.
Carbon footprint	A measure of the amount of greenhouse gases released into the atmosphere as a result of the activities of a particular individual, organization, or community.
Carbon intensity	A measure of greenhouse gas emissions per unit of activity (for example, kilometres travelled or GBP spent).
Carbon neutral	Balancing the greenhouse gases an organisation releases into the atmosphere with the amount they absorb or remove from the atmosphere through carbon offsetting.
Carbon offsetting	Compensating for greenhouse gas emissions by participating in schemes designed to make equivalent reductions of greenhouse gas emissions in the atmosphere.
Cascading failure	A failure in a system of interconnected parts in which the failure of one or few parts leads to the failure of other parts.
Fabric first	Prioritising the energy efficiency of a property from the start of the design process.

Term	Definition
Financed emissions	Greenhouse gas emissions linked to the investment and lending activities of an organisation
Fossil fuel	A natural fuel such as oil, coal or gas which releases greenhouse gases into the atmosphere when burned to produce energy
Greenhouse gas	Gases in the atmosphere that trap heat and accelerate climate change.
Hard-to-abate sector	Sectors of the economy for which reducing greenhouse gas emissions is either technologically or financially difficult (for example steel, cement and petrochemicals).
Net zero	Reducing greenhouse gas emissions to the lowest possible levels, before offsetting unavoidable residual emissions
Operational emissions	Greenhouse gas emissions linked to the operational activities of an organisation
Residual emissions	Greenhouse gas emissions which are either technologically or financially infeasible to eliminate
Zero-carbon energy	Zero-carbon energy is energy that does not release greenhouse gas emissions into the atmosphere and therefore does not contribute to climate change.

Foreword

At the Nursing and Midwifery Council (NMC), we play an important role in the UK health and care system, regulating some of the UK's most trusted and valued professionals: nurses, midwives and nursing associates.

Our vision is for "safe, effective and kind nursing and midwifery practice, improving everyone's health and wellbeing".

One of the most affecting moments in my time at the NMC was speaking to the mother of Ella Adoo-Kissi-Debrah who, after sadly dying at age nine, was the first person in the world to have air pollution cited as a cause of death. Speaking with Rosamund and hearing Ella's story leaves me in no doubt as to the significance of the climate crisis and environmental issues for our health and wellbeing. There is therefore an essential connection between our aim to improve everyone's health and wellbeing and our responsibility to address environmental issues.

As a first step, we must reduce our own environmental impact as an organisation, and I am delighted that we plan to reach carbon Net Zero by 2040. However, we can also use our position as a regulator to exert positive influence on the wider health and care sector, which accounts for over 4 percent of the UK's total carbon emissions. We know this issue is important to nurses, midwives and nursing associates, and we want to be leading the way in encouraging and supporting sustainable change across the sector.

I am therefore pleased to share our first Environmental Sustainability Plan and look forward to working with colleagues across the Nursing and Midwifery Council to build environmental sustainability into everything that we do. It's the least we can do to honour Ella's memory and make a difference for all of us potentially affected by the catastrophic effects of climate change on our health and wellbeing.

Andrea Sutcliffe CBE
Chief Executive and Registrar

Executive summary

At the Nursing and Midwifery Council (NMC), we recognise the serious impact of the climate and ecological crisis. From heatwaves to air pollution, climate change and other environmental issues threaten human health in the UK and worldwide.

Climate change and other environmental issues are also becoming increasingly important to our colleagues and the nurses, midwives and nursing associates on our register. We are therefore committed to acting in an environmentally sustainable way, and supporting those working in the health and care sector to do the same, particularly in reducing the greenhouse gas emissions driving climate change.

We are already making good progress in many areas, from switching to more energy efficient buildings, purchasing zero-carbon energy, limiting the waste we produce, reducing the paper we use and avoiding investment in the fossil fuel industry. However, we can and should go further. This Environmental Sustainability Plan therefore outlines how we will (1) reduce our environmental impact, (2) promote sustainable practice among nurses, midwives and nursing associates, and (3) build our resilience to climate risks. While this plan sets an initial direction for this journey, it will require review and iteration in the coming years as we adapt to changing circumstances.

Reducing our environmental impact

Our environmental impact includes the greenhouse gas emissions from both our operations and our investments, our water use and waste. Recognising the health impacts of climate change, reducing our operational greenhouse gas emissions is our top environmental priority. In financial year (FY) 2022-2023, our operational greenhouse gas emissions totalled 2,302 tonnes of carbon dioxide equivalent (tCO2e). At 2.1 tCO2e per full time employee, this aligns with expectations for an office-based organisation of our size.

However, we want to be leading the way as a low carbon organisation. We have therefore set the following targets:

1. **2030:** carbon neutral across all emissions
2. **2030:** net zero for Scope 1 & 2 emissions at 23 Portland Place
3. **2035:** net zero for Scope 1 & 2 emissions at all sites
4. **2040**: net zero for all of Scope 1, 2 & 3 emissions

The term ‘net zero’ refers to reducing operational emissions to the lowest possible levels, before offsetting unavoidable residual emissions. This differs from ‘carbon neutrality’, which simply means an organisation offsets as many carbon emissions as they produce from their operations.

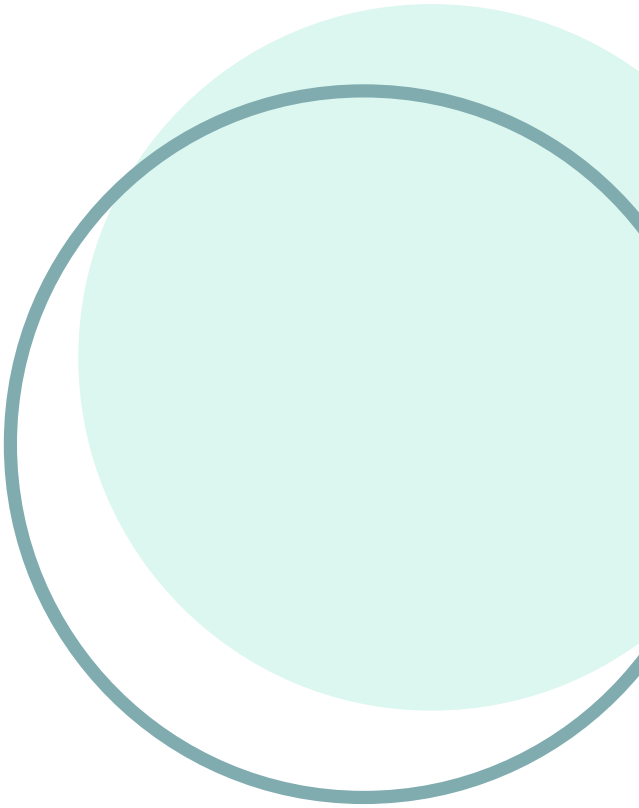
To reach these targets, we will take action in six priority areas:

1. **Our estate:** Switching to 100 percent zero-carbon energy, eliminating gas heating, and reducing energy use
2. **Our technology:** Minimising the impact of our data and technology
3. **Our supply chain:** Building sustainability into procurement
4. **Our business travel:** Minimising our air travel
5. **Our colleagues:** Promoting sustainable behaviour among our colleagues
6. **Our investments:** Reviewing our ethical investment policy

To reach carbon neutrality by 2030, and offset unavoidable residual emissions to reach net zero, we will take a portfolio approach to carbon offsetting including both tree planting and direct air capture.

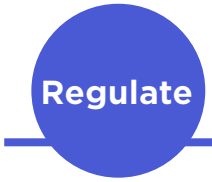
Promoting sustainable practice among nurses, midwives and nursing associates

We have a significant opportunity to influence the UK health and social care sector due to our direct line to over 808,000 nurses, midwives, and nursing associates, our standards for education providers, and our collaborative relationships with employers, including the NHS. We therefore have the opportunity to promote environmental sustainability far beyond the boundary of our organisation. This is especially important considering 4.4 percent of the world’s greenhouse gas emissions – the key drivers of climate change – arise from healthcare activities[1].



1 Health Care Without Harm. Health Care’s Climate Footprint.

Our approach to promoting sustainable practice among nurses, midwives and nursing associates across the UK centres around our three core functions: **Regulate**, **Support** and **Influence**.



We will ensure all of our standards, including the Code and education standards, reflect the importance of practising in a sustainable way. We will also encourage reflections on practising in a sustainable way through the revalidation process.

We will provide nurses, midwives and nursing associates with the supporting information they need to practise in a sustainable way.

We will communicate why sustainability in nursing and midwifery matters and what sustainable practice looks like, through general and targeted newsletters, social media and convening roundtable discussions.

Building our resilience to climate risks

The average surface temperature in the UK has risen by 1.2°C since pre-industrial times, and the evidence shows that we must be prepared for warming up to 4°C over the next 80 years[2].

We have identified climate-related risks associated with: (1) our estate, (2) social infrastructure, (3) health, wellbeing and productivity of colleagues, (4) our investments, and (5) the UK health and social care sector and professionals. We will reflect these risks to our corporate risk register to make sure we are giving them due consideration in all future decision-making. Key mitigations to these risks include monitoring of flood risks, keeping business continuity plans updated, investing in energy and water efficiency, developing a heat resilient estate, diversifying our investment portfolio, and developing clear routes for colleagues to raise wellbeing concerns.

We must also be mindful of the fact that climate change – and the associated risks to human health – is likely to place nurses, midwives and nursing associates under increasing pressure. In line with our values as a regulator, we must always be considerate of the pressure professionals on our register are under when planning our activities, include limiting our activities at times of particularly high pressure.

2 Intergovernmental Panel on Climate Change. Climate Change 2021: The Physical Science Basis.

Environmental Sustainability Plan summary

Our current environmental impact (2022-23)

Operational emissions:
2,302 tCO2e

At 2.1 tCO2e per full time employee, this aligns with the expectations of an office-based organisation of our size.

Scope 1
(direct emissions)
203 tCO2e (9%)

Scope 2
(purchased electricity)
43 tCO2e (2%)

Scope 3
(indirect emissions)
2,056 tCO2e (89%)

Financed emissions (Scope 1 &2):
835 tCO2e

Financed emissions (all scopes):
6,121 tCO2e

Water use:
2,318 cb m*

Waste generated:
77,448kg*

Our targets

2030
Carbon neutral across all emissions

2030
Net zero for Scope 1 & 2 at 23 Portland Place

2035
Net zero for Scope 1 & 2 at all sites

2040
Net zero for all emissions

Priorities for reducing our environmental impact

Our estate:
Switching to 100% renewable energy, eliminating gas heating and reducing waste.

Our business travel:
Minimising our air travel.

Our technology:
Minimising the impact of our data and technology.

Our colleagues:
Promoting sustainable behaviour among our colleagues.

Our supply chain:
Building sustainability into procurement.

Our investments:
Reviewing our ethical investment policy.

Additional aims

Promoting sustainable practice amongst nurses, midwives and nursing associates

Regulate | Support | Influence

Building the resilience of our organisation to climate-related risks

Estates | Social infrastructure | Employee health | Investments | UK healthcare

Introduction

At the Nursing and Midwifery Council (NMC), we recognise the serious impact of the climate and ecological crisis, and its effects on public health in the UK and worldwide.

We are therefore committed to acting in an environmentally sustainable way, and supporting those working in the health and care sector to do the same, particularly in reducing the greenhouse gas emissions which drive climate change.

That's why, in our 2020-2025 Strategy, we committed to developing an environmental sustainability plan which reduces our environmental impact, leverages our influence as a regulator to promote sustainable practice across the nursing and midwifery profession, and builds the resilience of our organisation to the risks posed by climate change.

There are actions we can take as an organisation, and that every colleague within the NMC can take, to help fulfil this mission. This plan outlines how we intend to do so.

About the NMC

We are the independent regulator for nurses and midwives in the UK, and nursing associates in England.

Our vision is safe, effective and kind nursing and midwifery practice that improves everyone's health and wellbeing. As the independent regulator over 808,000 nursing and midwifery professionals, we have an important role to play in making this a reality.

Our role is threefold:

1. **Regulate:** promoting and upholding high standards, maintaining the register of professionals eligible to practise, and investigating concerns about nurses, midwives and nursing associates.
2. **Support:** proactively supporting professions, striking the right balance between investigating rare cases of poor practice and promoting excellent practice.
3. **Influence:** working collaboratively with partners to address common concerns and drive improvement across the sector.

We have some 1,100 full time equivalent (FTE) employees working across four main sites in London and Edinburgh. We operate on a hybrid basis, with colleagues working from both the office and home.

What is environmental sustainability?

The United Nations defines 'sustainability' as: "meeting the needs of the present without compromising the ability of future generations to meet their own needs."[3] Since then, the 17 UN Sustainable Development Goals have provided the overarching framework for achieving sustainable development globally, focusing on issues ranging from eliminating poverty and promoting good health to climate action and reducing inequalities. The nurses, midwives and nursing associates we regulate play a crucial role in working towards these goals every day.

This plan focuses specifically on our contribution to environmental sustainability, considering how we can reduce our impact on the natural world and ensure our organisation is resilient to expected changes in the natural environment, most notably climate change.

Why does this matter to us?

The Intergovernmental Panel on Climate Change (IPCC) has concluded that to avert catastrophic health impacts, the world must limit temperature rise to 1.5°C[4]. However, even in the most optimistic scenarios, we are not currently on track to achieve this.

Tackling climate change is central to promoting good health

Climate change poses a range of threats to human health in the UK, which are likely to hit the poorest the hardest. For example, the July 2022 heatwave led to nearly 3,000 excess deaths, mostly among the over-65s[5], whilst rising temperatures have been linked to pre-term birth and damage to babies' health.[6] Meanwhile, air pollution in our towns and cities significantly increases the risk of respiratory conditions, lung cancer, stroke and cardiovascular disease, particularly impacting children as they grow.[7]

Our vision is for safe, effective and kind nursing and midwifery, improving everyone's health and wellbeing. However, climate change represents an increasing challenge to improving health and wellbeing in the UK.

3 United Nations. Sustainability.
4 IPCC. Global Warming of 1.5 ºC.
5 UK Government. UKHSA and ONS release estimates of excess deaths during summer of 2022.
6 Paediatric & Perinatal Epidemiology. Climate Change and Reproductive, Perinatal & Paediatric Health
7 UK Health Security Agency. Health Matters: Air pollution – sources, impacts and actions

We have the opportunity to promote change in the health and care sector

4.4 percent of the world's greenhouse gas emissions[8] – the key drivers of climate change – arise from healthcare activities. This means that if the global healthcare industry was a country, it would be the 5th largest emitting country in the world. Any lever to reduce greenhouse gas emissions from health and social care, including regulation of health and social care staff, can therefore play an important role in fighting climate change.

Environmental sustainability is important to our colleagues and the professionals we regulate

Our colleagues have made it clear that environmental sustainability is important to them, and we predict it will become increasingly important to retention and recruitment in the future. When we asked our colleagues why environmental sustainability matters to them, they said:[9]

> **Because we have a duty to protect future generations**

> **This is important to improve the health of people and the planet!**

> **We should treat our world with respect**

> **Earth is our only home, and we have to take care of it**

> **I'm worried for my young family and members who will be impacted**

> **We should act to protect nature and animals**

8 Health Care Without Harm. Health Care's Climate Footprint.

9 Quotes from workshop with NMC colleagues on 9 May 2023.

Environmental sustainability is also important to the nurses, midwives and nursing associates we regulate. Survey data shows 91 percent of health and social care professionals internationally are worried about climate change[10]. Acting on environmental sustainability will therefore help cement our reputation as a responsible regulator, and demonstrate to those on our register how we live our values. Additionally, our role as a regulator gives us the opportunity to lead the way and set an example for organisations across the UK health and social care sector.

Tackling climate change is important for Equality, Diversity and Inclusion

Finally, we know that acting on climate change supports our commitment to Equality, Diversity and Inclusion (EDI). Climate change affects everyone, but inequalities in society mean that not everyone is affected in the same way. Within the UK and globally, the poorest people will increasingly experience the worst impacts of climate change despite being the least responsible. Therefore, as our EDI plan is front and centre within our work, doing our bit to achieve greater environmental sustainability has never been more important.

10 Kotcher et al., 2021. Views of health professionals on climate change and health: a multinational survey study.

What have we achieved so far?

Energy efficiency

Our One Westfield Avenue office is BREEAM 'Excellent', meaning it is highly energy efficient, using a low emissions district heating system. Meanwhile, our Edinburgh office, 10 George Street, is BREEAM 'Very Good'.

Renewable electricity

Our buildings at One Westfield Avenue and 2 Stratford Place are powered by 100 percent renewable energy, while 23 Portland Place uses a low emissions electricity tariff.

Limiting waste

We have removed plastic bottles from our vending machines, use plant-based take away containers in our food provision, and are limiting our paper waste through increasing digitisation. At 23 Portland Place, our waste is 'zero to landfill'.

Reducing business travel

Since the COVID-19 pandemic, we are holding more hearings and internal meetings virtually, reducing our carbon emissions from business travel by 75 percent from 2018 to 2023.

Investments

We have an investment policy and use investment managers that are focused on net zero. For instance, we exclude investment in fossil-fuel companies, and our investment managers are a signatory to the Net Zero Asset Managers' Commitment looking to drive change in companies.

Our context

To achieve maximum impact, our Environmental Sustainability Plan must be sensitive to the wider context within which we operate. Key factors we considered in developing this plan were:

1. **The fitness to practise caseload:**
   Reducing our fitness to practise caseload safely and swiftly is our top corporate priority.

2. **Regulatory reform:**
   We are working with the Government to amend the legislation which guides how we operate, removing legal barriers that limit improvements in the way we regulate, so we can deliver better and safer regulation for the public.

3. **Pressures on health and social care services:**
   We know that, since the COVID-19 pandemic, nurses, midwives and nursing associates working across the UK are under more intense pressure now than ever before. We must therefore always be mindful of the impact our work has on those professionals.

4. **Rising energy prices:**
   The Russian invasion of Ukraine has resulted in high energy prices across the world, and this has a significant impact on our finances. Therefore, our Environmental Sustainability Plan also aims to limit our spend on energy.

5. **Equality, Diversity and Inclusion:**
   We have a responsibility as a regulator and as an employer to do everything we can to tackle discrimination and to promote diversity and inclusion.

6. **Refurbishment at 23 Portland Place:**
   Whilst currently paused due to other priorities and exploration of options, we currently plan to refurbish our main office at 23 Portland Place in the future. This provides a significant opportunity to reduce our environmental footprint.

Our Environmental Sustainability Plan

This plan aims to guide the NMC through its environmental sustainability journey over the next decade. It includes a range of actions for reducing our environmental impact, using our influence to promote sustainable practice among nurses, midwives and nursing associates, and adapting to emerging risks related to climate change.

This document has been developed collaboratively by a Sustainability Working Group, comprising colleagues from across the NMC in key areas of environmental impact such as estates, procurement, finance, people, IT, professional practice and professional regulation. It has then been further tested with interested colleagues at an open workshop. We also invited several external stakeholders, including senior nursing staff and trade union representatives, to comment.

Working towards environmental sustainability in an ever-changing world is a complex and uncertain task. While this plan sets an initial direction for this journey, it will require review and iteration in the coming years to ensure it reflects our strategic context and most pressing priorities.

Understanding our environmental impact

To develop an effective plan to reduce our environmental impact, we must first understand our current environmental impact.

This section summarises our environmental impact from FY 2018-19 to FY 2022-23. It first focuses on our operational greenhouse gas emissions, as reducing these emissions is our top priority. It then provides a summary of our financed greenhouse gas emissions, water use and waste.

This summary includes environmental impacts from all activity undertaken by NMC colleagues (including Council members) as part of our portfolio of work, and all travel and accommodation which is funded by the NMC, even for non-staff members. We have reported back to 2018-19 to understand how our environmental impact is changing over time. 2018-19 allows for the most meaningful comparisons with the most recent reporting year of 2022-23 because greenhouse gas emissions in the intervening years are either anomalously high due to construction projects or anomalously low due to the impacts of the COVID-19 pandemic.

Environmental reporting is an imperfect science: in most cases, we do not rely on perfect data but make informed estimates based on the operational data we do have. The figures provided in the remainder of this section are therefore estimates of the environmental impact of our operations, and in some cases are accompanied by significant uncertainty. In particular, our estimates of our supply chain greenhouse gas emissions, water use and waste generation rely heavily on assumptions.

Full detail of the assumptions and methods used are provided in our Environmental Impact Report, published alongside this Environmental Sustainability Plan.

Operational greenhouse gas emissions

Greenhouse gases are gases in the earth's atmosphere that trap heat. They are released into the atmosphere through a range of human activities, most notably through the burning of fossil fuels such as coal, oil and gas. The release of greenhouse gases from human activity is the primary cause of global climate change.

According to internationally recognised greenhouse gas accounting approaches, the greenhouse gas emissions of any organisation should be broken down into 3 scopes.

Scope 1

Direct emissions from sources an organisation owns or controls (for example, heating from gas boilers)

Scope 2

Indirect emissions from the purchase of electricity, heat or steam

Scope 3

All other indirect emissions (for example, business travel or supply chain)

Additional detail on what is included in each of the scopes can be seen in Figure 1 below.

Figure 1 - The NMC's greenhouse gas emissions are reported within three scopes

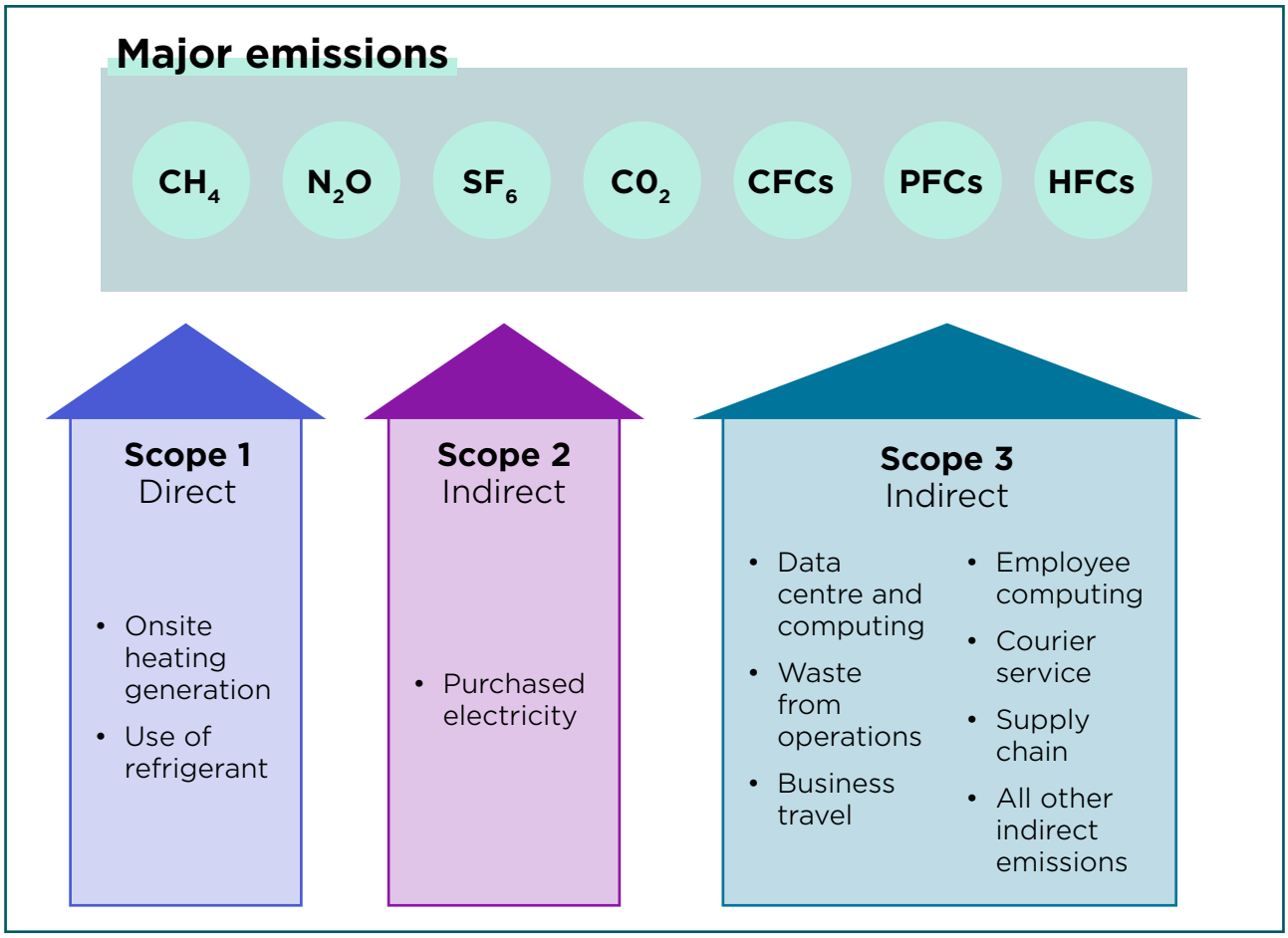
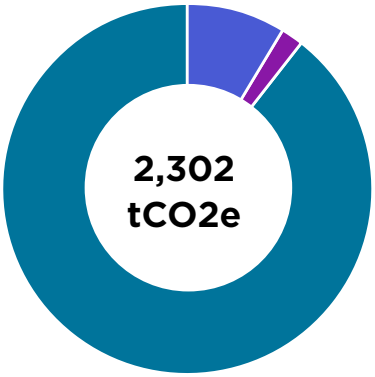
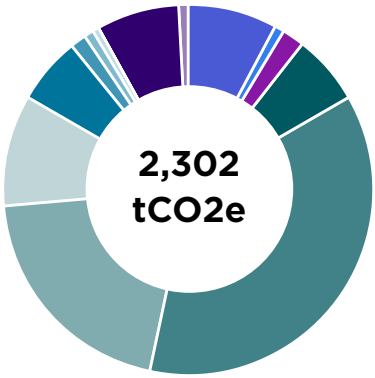


Figure 2.1 - Summary of the NMC's operational greenhouse gas emissions

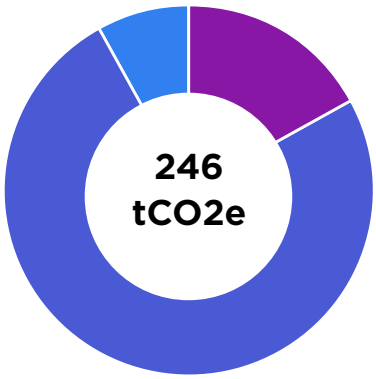
Scope 1, 2 and 3 overview



Scope 1, 2 and 3 breakdown

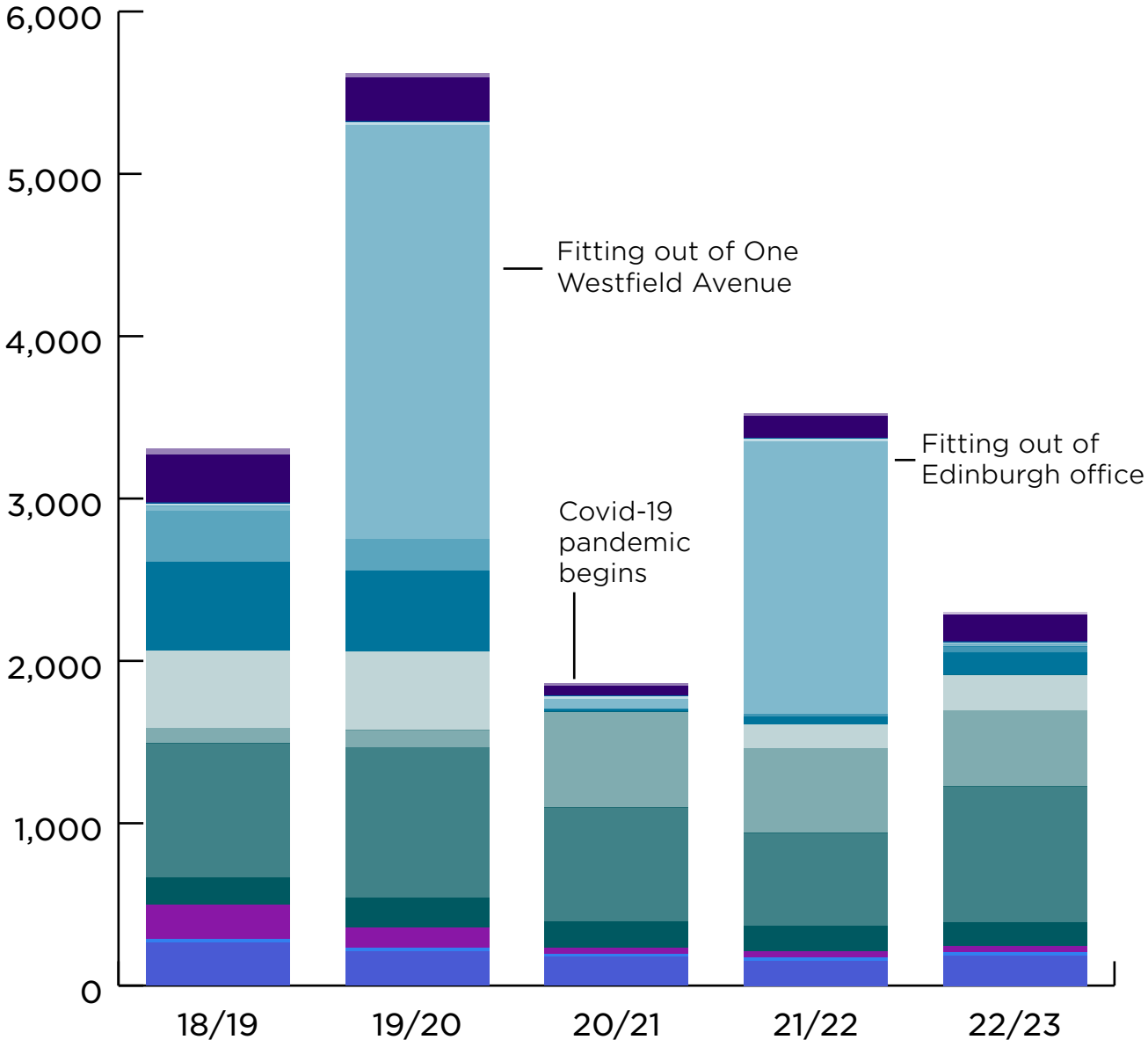


Scope 1 and 2 breakdown



	tCO2e	%
Scope 1	**203.5**	**8.8**
Heating and boiler fuels	184.7	8.0
Refrigerant	18.8	0.8
Scope 2	**42.9**	**1.9**
Electricity (market-based)	42.9	1.9
Scope 3	**2055.7**	**89.3**
Data centre and computing	141.8	6.2
Other supply chain	839.4	36.5
Homeworking	467.4	20.3
Employee commuting	220.7	9.6
Business travel	136.1	5.9
Accommodation	35.6	1.5
Building and construction	16.3	0.7
Courier service	12.5	0.5
Waste disposal	1.7	0.1
Water supply and treatment	1.0	0.0
Well-to-tank factors	166.5	7.2
Transmission and distribution	16.8	0.7
Total	**2302.0**	

Figure 2.2 - Summary of the NMC's change in emissions over time



Scope 1
- Heating and boiler fuels
- Refrigerant

Scope 2
- Electricity (market-based)

Scope 3
- Data centre and computing
- Other supply chain
- Homeworking
- Employee commuting
- Business travel
- Accommodation
- Building and construction
- Courier service
- Waste disposal
- Water supply and treatment
- Well-to-tank factors
- Transmission and distribution

In 2022-23, our greenhouse gas emissions totalled 2,302 tCO2e: the equivalent of 771 flights from London to Sydney on a standard commercial plane. At 2.1 tCO2e per FTE, this is in line with expectations for an office-based organisation of our size. As outlined in Figure 2.1, the vast majority of our greenhouse gas emissions (89.3 percent) fall within Scope 3. This is typical for an office-based organisation with a limited estate, and no extractive or industrial activities. Meanwhile, 8.8 percent of our emissions fall within Scope 1 and just 1.9 percent fall within Scope 2 (market-based).[11]

The most significant emissions categories are our supply chain, homeworking, employee commuting, heating and boiler fuels, well-to-tank factors[12], data centre and computing, business travel and electricity.

When we consider how our greenhouse gas emissions have changed over time, we see that our greenhouse gas emissions have fallen by 30 percent since 2018-19. This is largely due to: (a) changes in ways of working triggered by the COVID-19 pandemic, including reduced business travel, (b) the move to One Westfield Avenue, which uses renewable energy and biomass-fuelled district heating, and (c) improved carbon efficiencyacross the UK, especially in terms of the fuel mix of the UK electricity grid.

However, as many of these changes result from specific events (for example, the COVID-19 pandemic and move to One Westfield Avenue), we cannot expect emissions to continue reducing at this rate without further action.

Emissions have reduced even more considerably when compared to 2019-20 (59 percent) and 2021-22 (35 percent), although emissions in these years are anomalously high due to large construction projects. Meanwhile, greenhouse gas emissions in 2022-23 remained 24 percent above emissions levels from 2020-21; however, emissions in 2020-21 are anomalously low due to a range of factors associated with the COVID-19 pandemic.

While Scope 1 and 2 emissions account for just 10.7 percent of our total emissions, they are particularly important to consider in any decarbonisation strategy because they are in our direct control. As the wider economy begins to decarbonise, our Scope 3 emissions will begin to reduce by default; however, reducing Scope 1 and 2 emissions will require significant action from us.

11 Market-based Scope 2 emissions account for the proportion of zero-carbon energy an organisation purchases, in contrast to location-based emissions which do not.

12 Well-to-tank factors account for all the greenhouse gas emissions released into the atmosphere from the production, processing and delivery of a fuel or energy vector

Financed greenhouse gas emissions

We also maintain stock market investments currently worth around £35 million, providing opportunities to influence the behaviour of commercial organisations in support of our approach to sustainability. Our ethical investment policy currently precludes all investment in fossil fuel companies, as these are considered to exist in direct contradiction to our values and objectives. We also use investment managers that build the carbon impact and net zero plans of companies into their investment decisions.

However, there is still a large carbon footprint associated with our investment portfolio. When we consider just the Scope 1 and 2 emissions of our investees, the greenhouse gas emissions financed by our equities alone (excluding government bonds, properties and cash reserves) equate to 835 tCO2e each year. This rises to 6,121 tCO2e per year when we also consider the Scope 3 emissions of investees. 83 percent of these financed emissions (all scopes) arise from investments in just ten companies, found in industries such as metal and mining, packaging, technology hardware and machinery and equipment.

Our investments are therefore another lever in which to encourage the global transition towards net zero. However, direct comparison between our operational and financed emissions is not recommended. While we can exert some influence through our investment portfolio, these financed emissions are not within our direct control, and cannot be eliminated in the way operational emissions can be.

Water

Estimating our water use has proved difficult due to lack of historic data over the reporting period. However, from making a range of assumptions, we estimate we used 2318 cubic metres of water in 2022-23, down by 49 percent from 2018-19. This large reduction primarily arises from the assumption that the average colleague now visits the office 1.5 rather than 4 times a week, with a large proportion of office water use related to toilet flushing and hand washing.

Waste

As with estimating our water usage, limited data has made estimating our waste generation difficult. However, using a range of assumptions, we estimate we produced 77,784kg of waste in 2022-23. Of this, 22 percent was general waste, 22 percent was mixed recycling, 55 percent was confidential paper waste and 1 percent was food waste. It is important to note that, because of the nature of our work, we generate a relatively high level of paper waste.

Reducing our environmental impact

To meet our ambition of reducing our environmental impact over the coming years, we have set targets and identified a range of key actions to reduce our operational emissions. We have also considered actions to reduce our financed emissions, water use and waste.

Our targets

To reduce our operational greenhouse gas emissions in line with the action needed to prevent the worst impacts of climate change, we have set the following targets:

1. **2030:** carbon neutral across all emissions
2. **2030:** net zero for Scope 1 & 2 emissions at 23 Portland Place
3. **2035**: net zero for Scope 1 & 2 emissions at all sites
4. **2040:** net zero for all emissions

The term 'net zero' refers to reducing operational emissions to the lowest possible levels, before offsetting unavoidable residual emissions. This differs from 'carbon neutrality', which simply means an organisation offsets as many carbon emissions as they produce from their operations, without necessarily taking action to reduce their emissions.

Net zero is considered the 'gold standard' for climate action, because (a) the genuine impact of carbon offsets is difficult to reliably measure, and (b) carbon offsets will not be sufficient globally to fully mitigate climate change.

We will also aim to reduce our overall energy consumption, in recognition of the fact that the cleanest form of energy is the energy that is never produced, and that zero-carbon energy itself does have some negative impact on natural environments.

We believe these are ambitious but realistic targets for us to strive for. Our net zero targets align with those of other professional regulators in the health and care sector and with the UK Government's aim of decarbonising the entire economy, including hard-to-abate sectors (for example, steel, cement and petrochemicals), by 2050.

We have not set specific targets for reducing our financed emissions, as we recognise we have limited control over these – however, we will continue to measure our financed emissions moving forwards and consider setting targets in the future.

Similarly, we have not yet set targets for our water use or waste. This is because our current data in these areas is limited, meaning we are not confident in our current baseline which we set a target against. We therefore intend to improve our data collection in these areas before setting targets in future.

Our priority areas

We have identified six priority areas for reducing our environmental impact, and set ourselves key targets for each. The following sections outline the full range of actions we will take in each area.

Priority area	Target(s)[13]	Operational emissions change from 2022-23	
		2030	2040
1. Our estate: Switching to 100% zero-carbon energy, eliminating gas heating, and reducing energy use	**1.1.** Switch to 100% zero-carbon electricity at 23PP by 2030 and at all estates by 2035 **1.2.** Eliminate gas heating at 23PP by as soon as possible and at all estates by 2035 **1.3.** Reduce our total energy use by 35 percent by 2030	**-8%**	**-9%**
2. Our technology: Minimising the impact of our data and technology	**2.** Complete the transfer of all our data storage to the Cloud by 2025, with a provider aiming to be net zero by 2030	**-4%**	**-4%**
3. Our supply chain: Building sustainability into procurement	**3.** Ensure 80% of our spend by 2030 is with suppliers with public net zero commitments for 2040 as a minimum	**-9%**	**-9%**
4. Our business travel: Minimising our air travel	**4.** Reduce our air travel within England, Scotland and Wales by 80% by 2028	**-2%**	**-2%**
5. Our colleagues: Promoting sustainable behaviour among our colleagues	**5.1.** Provide all colleagues with information on sustainable homeworking by 2026 **5.2.** Increase commuting by cycling or walking to work by 25% by 2026	**-2%**	**-2%**
6. Our investments: Reviewing our ethical investment policy	**6.** Review and update as necessary our ethical investment policy by the end of 2024 to improve the sustainability of our portfolio	**N/A**[14]	**N/A**
Additional reductions from decarbonisation of UK economy		**-16%**	**-50%**
Remaining carbon emissions to offset (for carbon neutral in 2030, and net zero in 2040)		**56%**	**24%**

13 All targets are set against 2022/23 levels.

14 Note that while this priority area will have an impact on our financed emissions, it has no impact on our operational emissions. We have not set specific targets for financed emissions.

Our estate

Our targets in this area:

- Switch to 100% zero-carbon electricity at 23PP by 2030 and at all estates by 2035.
- Eliminate gas heating at 23PP and at all estates by 2035.
- Reduce our total energy use by 35 percent by 2030.

Our Scope 1 and 2 emissions arise from our heating, electricity use, and use of refrigerants in air conditioning and refrigerators. Our estate is therefore absolutely central to our efforts to reach net zero in Scope 1 and 2 by 2035.

We currently operate across four buildings:

- 23 Portland Place (23PP),
- One Westfield Avenue (OWA) and
- 2 Stratford Place (2SP) in London
- 10 George Street in Edinburgh.

We have already made a range of positive changes across our estate: our new offices at OWA and 10GS are rated as BREEAM 'Excellent' and 'Very Good' respectively, we use a much larger proportion of renewable energy than the national average, and have been reducing our total estates footprint in recent years.

However, we will further reduce the environmental impact of our estate in four key ways: (A) developing a sustainable estate at 23 Portland Place, (B) reducing and flexing our estates footprint, (C) switching to 100 percent zero-carbon energy at 23 Portland Place, and (D) supporting and delivering change at other sites.

A. Switching to 100 percent zero-carbon energy at 23 Portland Place

Our electricity at 23 Portland Place is currently supplied by a Crown Commercial Services mega users contract which offers us good value for money and funds more zero-carbon energy than the national average. However, this contract does not yet supply us with 100 percent zero-carbon energy, which will be crucial to reaching our target of net zero in Scope 1 and 2 at 23 Portland Place by 2030.

We will therefore monitor the progress of this contract towards achieving 100 percent zero-carbon energy over the coming years, and look to switch contract if it is determined that progress is insufficient to meet our 2030 target.

B. Developing a sustainable estate at 23 Portland Place

23 Portland Place is our largest and oldest building, and therefore accounts for a significant proportion of our current environmental impact. In the future we plan to undertake a full refurbishment of the building to deliver a fit-for-future space which is a great place to work for our colleagues and to reduce our environmental impact.

Whilst this plan is currently paused, reflecting other priorities and subject to considering other options, our aim would be to take a 'fabric first' approach to refurbishment: prioritising the energy efficiency of the building from the start. This will include a range of upgrades to achieve our aim of BREEAM 'Very Good' status, including:

- improving insulation throughout the building
- installing smart building management systems to give us greater control over our energy use
- installing waste heat recovery technology
- ensuring we use LED lighting and modern energy efficient appliances
- replacing our outdated air conditioning and fresh air mix system with a more modern and efficient alternative
- These energy efficiency measures not only reduce our carbon footprint but are also estimated to reduce our energy bills.

We also aim to switch from our current gas heating system at 23 Portland Place to a lower emission electric heating system, with the potential to reach zero emissions if we move to a 100 percent zero-carbon energy supply.

Additional measures taken throughout the future refurbishment of 23 Portland Place may include installing rainwater harvesting systems and low water use facilities to conserve water and refreshing our bike racks and showers to encourage active commuting.

Finally, to maximise the positive environmental impact of the future refurbishment of 23 Portland Place, we must consider not just what we do but how we do it. We will therefore ensure the suppliers we contract for the work have a clear plan for reducing the environmental impact of the works.

C. Reducing our estate's footprint

The most guaranteed way to reduce the environmental impact of our estate is to reduce our overall estate's footprint: this means less heating and cooling, less electricity for lighting, and frees up space for other organisations to occupy without relying on new builds.

We have already reduced our estate's footprint substantially consolidating our estate in London, Belfast and Cardiff in the last 5 years. We have the opportunity to take this a step further when the lease for our hearings venue at 2 Stratford Place ends. Following the COVID-19 pandemic, a large proportion of our fitness to practise hearings are now virtual, meaning we need fewer in-person hearing rooms. This will give us the opportunity of transferring our hearings function once the refurbishment at 23 Portland Place is completed. This would have the benefit of reducing our total estate's footprint by nearly a quarter.

D. Supporting and delivering change at multi-tenanted buildings

Alongside 23 Portland Place, we occupy three multi-tenanted buildings, although this will reduce to two if we are able to close 2 Stratford Place. At these two buildings – One Westfield Avenue and 10 George Street – we do not have control over factors such as the heating system and the electricity supply. However, we can leverage our influence as tenants to lobby the building managers to make sustainable changes.

Notably, One Westfield Avenue is already a highly sustainable building: it is rated as BREEAM 'Excellent', powered by 100 percent renewable energy, and uses a low-emissions biomass-fuelled district heating system. There is therefore limited change we wish to see at One Westfield Avenue.

Meanwhile, 10 George Street is rated as BREEAM 'Very Good', but uses a gas heating system and its electricity supply is partially fossil fuel based. Switching away from gas heating and to 100 percent zero-carbon electricity will help to reach our target of net zero in Scope 1 and 2 by 2035. We will therefore use our influence to encourage a switch to electric heating and 100 percent zero-carbon energy at 10 George Street.

At both of these sites, we will also lobby the respective building managers to ensure waste collection and disposal methods match our 'nil to landfill' policy at 23 Portland Place.

Our technology

Our target in this area:

- Complete the transfer of all our data storage to the Cloud by 2025, with a provider aiming to be net zero by 2030

As an office-based organisation, a large proportion of our environmental impact stems from the technology that we use. We are in the process of upgrading our technology to ensure we have the appropriate modern tools for fulfilling our roles. As part of this, we must consider how we can make choices which limit the environmental impact of our technology.

A. Transferring our data storage to a net zero cloud provider

Our use of data centre services accounts for 6 percent of our total carbon footprint. Data centres use large amounts of electricity (up to 3 percent globally[15]) for both computing power and temperature regulation. However, cloud computing options can reduce emissions for a range of reasons[16], with cloud storage estimated to be 71-79 percent more energy efficient than data centre storage.[17]

We will therefore migrate most of our services to cloud services in the next year with a supplier aiming to reach net zero by 2030. We will monitor our supplier's progress against their net zero goal and consider switching supplier if this is not met. This also has benefits for our information security, operational efficiency and crucially our carbon footprint.

B. Continuing digitisation to reduce paper use

The NMC still uses large amounts of paper, especially in activities related to our in-person hearings. However, we have been working to increasingly digitise our ways of working over recent years to improve our operational efficiency. As we now begin to accelerate our transition towards net zero, we will redouble our efforts to further digitise processes where paper is still in use, while remaining mindful of our responsibility to support those who may struggle to use digital technologies due to disability, digital skills or digital access.

15 Data Centre Magazine. Energy efficiency predictions for data centres in 2023

16 Dgtl Infra. Green Cloud Computing, Data Centers and Technology

17 Data Center Knowledge. How Microsoft is Keeping Its Cloud More Efficient Than Your Data Center

C. Understanding the optimal rate of replacement for technology products

We regularly purchase new technology products, such as laptops, monitors and computer accessories to support our colleagues to work efficiently. In 2022-23, purchasing new laptops accounted for 17 percent of our total carbon footprint.

We are now moving to an evergreen model where we continually swap out our oldest technology products. To do this sustainably, we must consider the trade-offs between the additional embedded carbon in new products and the additional emissions associated with inefficient older technology. Further work will help us understand this trade-off to inform our standard rates of replacement for these products.

Our aim to decarbonise in this area will be further supported by changes to procurement processes which ensure sustainability is considered in the procurement of all future technology products.

Our supply chain

Our target in this area:

- Ensure 80% of our spend by 2030 is with suppliers with public net zero commitments for 2040 as a minimum.

Our supply chain (excluding our technology services) accounted for 37 percent of our greenhouse gas emissions in 2022-23. This includes a range of goods and services we purchase, including professional services, printing and paper, catering services, and building maintenance and construction services. These emissions will reduce over time as the wider UK economy decarbonises; however, we must still take concerted action to accelerate the decarbonisation of our supply chain to reach our target of net zero in all scopes by 2040.

We will reduce the environmental impact from our supply chain in three key ways: (A) building sustainability into our procurement processes, (B) upskilling colleagues on sustainable procurement, and (C) encouraging change among existing suppliers.

A. Building sustainability into our procurement processes

We already include consideration of environmental sustainability in many of our procurements through the inclusion of social value answers; however, we can go further to ensure the suppliers we work with are limiting their environmental impact. We will therefore (A) ensure that, where relevant, new high value procurements include criteria on environmental sustainability, considering both weighted and yes/no criteria, and (B) require clear consideration of environmental sustainability in all business cases presented to the Executive and Council, as we currently do for Equality, Diversity and Inclusion considerations.

B. Upskilling colleagues on sustainable procurement

Procurement at the NMC is not purely the responsibility of our procurement team: rather, colleagues from across the NMC lead procurement processes where spend is under £100,000. Therefore, to maximise the benefit of sustainability-focused changes to our procurement process, we must clearly communicate the rationale for these changes and the expectations of colleagues.

C. Encouraging change among existing suppliers

Our ability to influence our supply chain is not limited to the point of procurement. We can also have influence over our existing suppliers. We will aim to communicate our net zero and environmental sustainability intentions to all our suppliers and be clear that we will switch suppliers if necessary to reach our goals.

For small and medium-sized enterprises (SMEs) who are yet to plan for reaching net zero, we will signpost them towards publicly available guides to reaching net zero for SMEs. Where we have closer relationships with suppliers, we will work directly with them to reduce the impact of their services: for example, we will work with our caterers to develop low carbon menu plans at our canteen at 23 Portland Place.

Our business travel

Our target in this area:

- Reduce our air travel within England, Scotland and Wales by 80% by 2028.

Our business travel accounted for 6 percent of our total carbon emissions in 2022-23. 63 percent of these emissions arise from travel by our colleagues, while 25 percent and 5 percent arise from travel to hearings by panellists and legal assessors respectively. Although this is a significantly smaller proportion of our total emissions than those associated with our supply chain, taking action to reduce our emissions from business travel is especially important for three reasons.

Firstly, the transport industry – and especially the aviation industry – is a hard-to-abate sector, meaning that we cannot expect our emissions from transport to reduce significantly without concerted action. Secondly, much of our business travel emissions arise from flights within England, Scotland and Wales, offering another significant opportunity to decarbonise by switching to train travel. And thirdly, the COVID-19 pandemic has shown us how virtual working can reduce the need for business travel, providing a significant opportunity for decarbonisation.

Flying is a very carbon intensive form of travel, releasing 6.7x more greenhouse gas emissions than train travel for every kilometre travelled. Indeed, in 2022-23, air travel accounted for 80 percent of our emissions from business travel, despite accounting for just 37 percent of total distance travelled. Minimising air travel is therefore our key priority in this area.

We have made good progress in this area already: since the COVID-19 pandemic, we are holding more hearings and internal meetings virtually, reducing our carbon emissions from business travel by 75 percent from 2018 to 2023.

However, we will try to go further to reduce the environmental impact from our business travel in three key ways: (A) switching from plane to train for travel within England, Scotland and Wales, (B) capitalising on virtual working for meetings and hearings, and (C) reviewing travel to and from Northern Ireland for hearings.

A. Switching from plane to train for travel within England, Scotland and Wales

In 2022, we funded 239 flights within England, Scotland and Wales for our colleagues(including our Council) and panellists and legal assessors at our hearings. This accounted for 55 percent of all flights we funded, with flights between London and Edinburgh the most common route. We already have a prompt encouraging train travel over air travel on our travel booking portal; however, we may be able to go further to reduce air travel within the UK mainland.

We will therefore aim to reduce our air travel within England, Scotland and Wales by 80 percent from 2022-23 levels by 2028. This would mean approximately 200 fewer flights within England, Scotland and Wales each year if possible. Travel by train should become the default option for all colleagues and for any travel by non-staff members financed by the NMC (for example, travel of legal assessors or panellists to fitness to practise hearings). We will look to develop clear criteria to travel by plane which reflects our commitment to Equality, Diversity and Inclusion, such as reasonable adjustments for disabilities or exceptions for caring responsibilities.

We recognise train travel may be less convenient than air travel for some of our colleagues. We will therefore support our colleagues to travel by train by reinforcing the message that time travelling by train counts as 'work time', encouraging consideration of meeting times to allow more convenient travel by train, and providing privacy screen protectors to minimise possible information governance risks when working on trains.

B. Capitalising on virtual working for meetings and hearings

Like many organisations, the NMC made a dramatic shift towards hybrid working during the COVID-19 pandemic. This included holding our fitness to practise hearings and many of our internal meetings virtually. This has had benefits for our carbon footprint, but also for our operational efficiency and the wellbeing of colleagues.

We have significantly decreased the proportion of in-person fitness to practise hearings in recent years. We consider each case individually and decide whether to hold a physical or virtual hearing based on the needs of those involved, such as reasonable adjustments which need to be made for professionals, witnesses or assessors. We are currently reviewing our fitness to practise processes and will ensure that consideration of the environmental implications of increased travel to in-person hearings is factored into this process.

Meanwhile, we will develop clear guidance on when to hold internal meetings virtually versus in-person. Alongside considerations around effectiveness, building cohesive teams, and Equality, Diversity and Inclusion, this will encourage consideration of the emissions associated with business travel and include a higher bar for in-person meetings where air travel is required.

C. Reviewing travel to and from Northern Ireland for hearings

44 percent of our flights were between Northern Ireland and the UK mainland in 2022, with much of this air travel stemming from colleagues travelling to fitness to practise hearings. We will therefore review how we can reduce air travel to and from Northern Ireland for hearings, including considering the home locations of NMC colleagues, panellists and legal assessors when selecting personnel for hearings.

Our colleagues

Our targets in this area:

- Provide all colleagues with information on sustainable homeworking by 2026.
- Increase commuting by cycling or walking to work by 25% by 2026.

Delivering reductions in our greenhouse gas emissions will also benefit from action from all our colleagues at the NMC. Our analysis of our carbon footprint shows that greenhouse gas emissions from homeworking and employee commuting are particularly important to consider. While working from home currently releases marginally fewer emissions than working in the office on average, this difference is not sufficiently large for us to focus our efforts on encouraging colleagues to work at home or in the office. Rather, we must support our colleagues to make more sustainable choices when either working from home or travelling to the office.

We have developed a four-pronged approach to doing so: (A) engage, (B) inform, (C) nudge, and (D) support.

A. Engage: Engaging our colleagues in the sustainability agenda

We have begun engaging our colleagues in the sustainability agenda throughout the development of this plan. However, we will continue meaningful engagement with our colleagues through our NMC Environmental Group, Employee Forum and other internal communications, emphasising why this is important, outlining what we plan to do, and celebrating our successes.

B. Inform: Helping our colleagues understand their impact

We will support our colleagues to become more informed about both the NMC's carbon footprint and their own personal carbon footprint, including understanding the impact specific actions can have when travelling to the office or working from home through a sustainable commuting and sustainable homeworking guide.

C. Nudge: Prompting our colleagues to make sustainable choices

We will 'nudge' our colleagues towards more sustainable choices where appropriate through a range of signage around the office to prompt colleagues towards actions such as switching off lights and monitors, taking the stairs, and reducing printing.

D. Support: Providing incentives to make sustainable choices

To encourage active commuting we will re-advertise our existing cycle to work scheme and refresh our bike racks and showers as part of the 23 Portland Place future refurbishment. We will also investigate establishing a salary sacrifice scheme to support interested colleagues in purchasing electric vehicles, which provides significant tax advantages under current government rules.

Finally, to encourage sustainable choices and build engagement with the environmental sustainability agenda, we will consider gifting our colleagues small environmental sustainability packages, including products such as an LED lightbulb or reusable water bottle. However, mindful of both financial constraints and limiting our waste, we will ensure any packages are low cost and require opt in from colleagues.

Our investments

Our target in this area:

- Review and update as necessary our ethical investment policy by the end of 2024 to improve the sustainability of our portfolio.

Our investments provide a further opportunity to influence the behaviour of commercial organisations in support of our approach to sustainability.

We will therefore: (A) monitor the carbon emissions associated with our investments, (B) consider how we can strengthen our commitment to environmental sustainability through our ethical investment policy, and (C) undertake further investigation of our non-equities investments.

A. Monitor the carbon emissions associated with our investments

To minimise the environmental impact of our investments, we first need to understand the impact our different investments are having. We will therefore work with our investment managers to monitor the carbon emissions we are financing on an annual basis.

B. Strengthen our commitment to environmental sustainability through our ethical investment policy

Our Ethical Investment Policy currently precludes all investment in fossil fuel companies, as these are considered to exist in direct contradiction to our values. However, we may be able to go further to ensure our investments are both avoiding accelerating environmentally harmful business practices and actively supporting positive initiatives.

We will, therefore, investigate approaches to building the exclusion of equities with particularly high carbon impact into our ethical investment policy, considering both the current carbon intensity of a company and evidence of progress towards net zero targets. We will also consider setting a target level of investments financing zero-carbon energy research and generation.

C. Undertake further investigation of our non-equities investments

We currently understand the environmental impact of our equities; however, we have far less understanding of the impact of our other investments, including government bonds, property, pensions and cash reserves.

It will be especially important to review our pensions, supporting the alignment of the investments made to our values and ethical investment policy. We have recently retendered our workplace pension scheme and the approach to sustainable investment was a significant criterion for assessment.

Offsetting our emissions

Alongside reducing our environmental impact as far as possible, we will use carbon offsets to (a) offset the impact of our unavoidable residual emissions to reach net zero, and (b) help us reach carbon neutrality in advance of our net zero goals. However, we are clear that offsetting must be additional to efforts to reduce our carbon footprint, and must not be used as a justification for not taking concerted action to reduce our impact.

Our approach is focused on carbon removal rather than emissions avoidance because the real-world impact of emissions avoidance offsets (for example, funding zero-carbon energy) are difficult to reliably assess. We intend, therefore, to adopt a portfolio approach to offsetting, offsetting 90 percent of our emissions through UK-based tree planting and 10 percent through direct air capture. Further work will be needed to select the exact offsetting schemes and portfolio.

Using this approach, we aim to reach carbon neutrality by 2030.

A. UK-based tree planting

Trees play an important role in the global carbon cycle and are estimated to be responsible for approximately one-third of the total carbon uptake by land plants. In a single year, an average tree can absorb up to 22 kg of carbon dioxide from the atmosphere.[18] Tree planting is therefore an effective way to offset carbon emissions while also providing additional benefits for biodiversity and creating natural spaces to enhance human health and wellbeing.

However, we recognise that the positive impact of carbon offsetting through planting trees may not be permanent unless the trees are managed and protected properly over the long term. We will mitigate this risk by investing in reputable UK-based providers such as the Woodland Trust.

We currently expect to offset 90 percent of our emissions using this approach.

18 Auditel. How Effective is Carbon Offsetting Through Planting Trees.

B. Direct Air Capture

Direct air capture technologies extract carbon directly from the atmosphere to be permanently stored in deep geological formations. This is the highest quality offset available as it actively removes carbon from the air and makes use of a limited land area. Investing in direct air capture also helps fund the development of a nascent technology which may prove important in the global effort to tackle climate change.

However, direct air capture is currently much more expensive than other offsetting approaches, meaning we currently expect to offset 10 percent of our emissions using direct air capture.

Estimated cost

We estimate that offsetting to reach carbon neutrality will cost £90,000-£130,000 in FY 2030-31. However, as our emissions reduce further, these costs will reduce year on year to £40,000-£80,000 a year to reach net zero in 2039-40. We believe this is an appropriate use of a modest level of registrant funds as it directly supports action on climate change which will improve health across the UK and worldwide. However, we will review our approach to offsetting as we approach 2030 to ensure we are receiving the best value for money.

Our trajectory to net zero

Considering all of the actions outlined in this plan, we have estimated our trajectory towards our key targets. These are estimates based on a range of assumptions such as timing and scope of the 23 Portland Place future refurbishment and therefore will require further revision as we move towards our target dates. The timing of some of these changes is slowly shifting, but these do not impact our key target dates.

Figures 3 and 4 outline our expected trajectory to reaching net zero in Scope 1 and 2 emissions by 2035. In this scenario, switching away from gas heating eliminates all of our Scope 1 emissions excluding those related to refrigerants (~13 tCO2e) and the biomass-fuelled district heating system at One Westfield Avenue (<1 tCO2e). Meanwhile, a switch to 100 percent zero-carbon electricity eliminates our Scope 2 emissions. The remaining residual Scope 1 and 2 emissions will then be offset using the approach described above.

Figure 3 - Projected trajectory to net zero for Scope 1 and 2 emissions

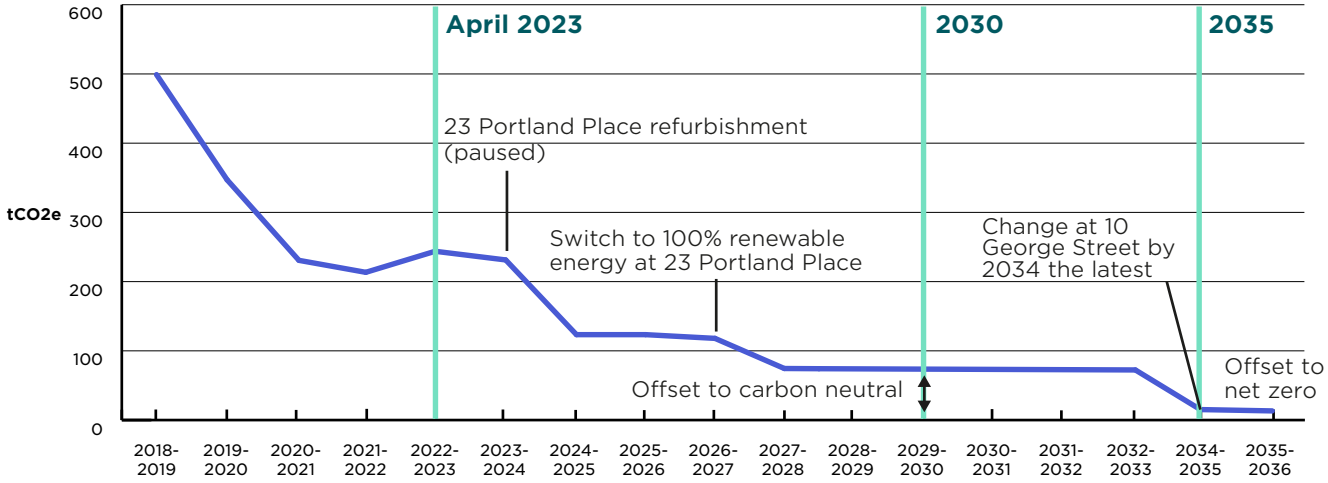
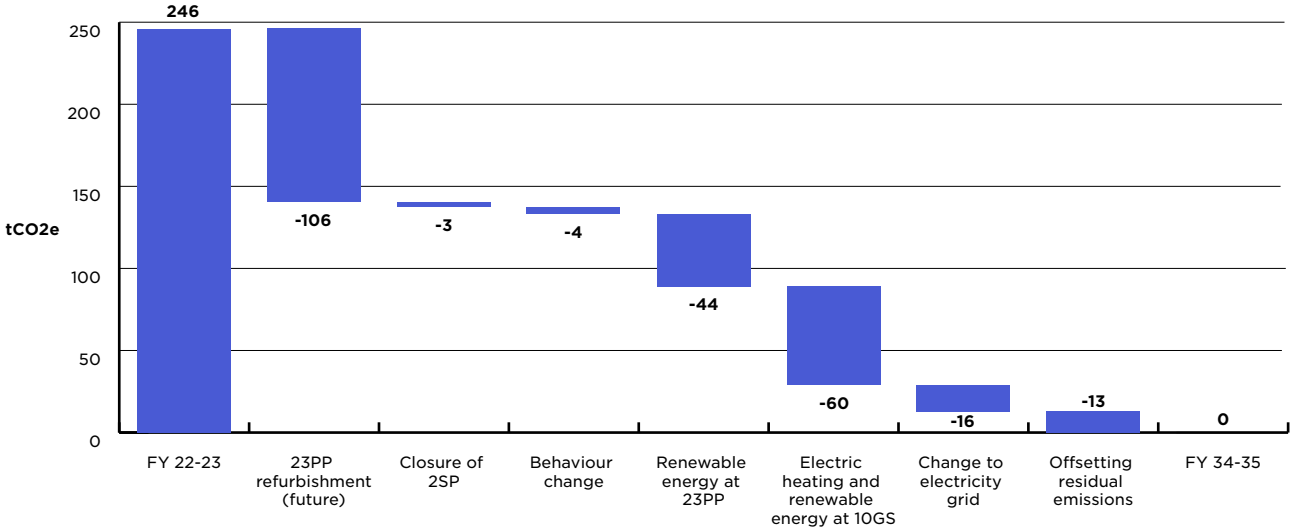


Figure 4 - Contribution of actions to journey to net zero for Scope 1 and 2 emissions



Figures 5 and 6 outline our expected trajectory to reaching net zero across all Scopes by 2040, providing a range of estimates based on the potential speed of the decarbonisation of the wider UK economy. In the most optimistic scenario, all suppliers and industries deliver on science-based net zero targets to limit global heating to 1.5°C; in the most pessimistic scenario, all suppliers and industries only make 50 percent of the emissions reductions necessary to meet this goal.

The trajectory shows total emissions falling from 2018–19 levels by 42–59 percent by 2030 and by 66–83 percent by 2040.

Figure 5 - Projected trajectory to net zero for all scopes

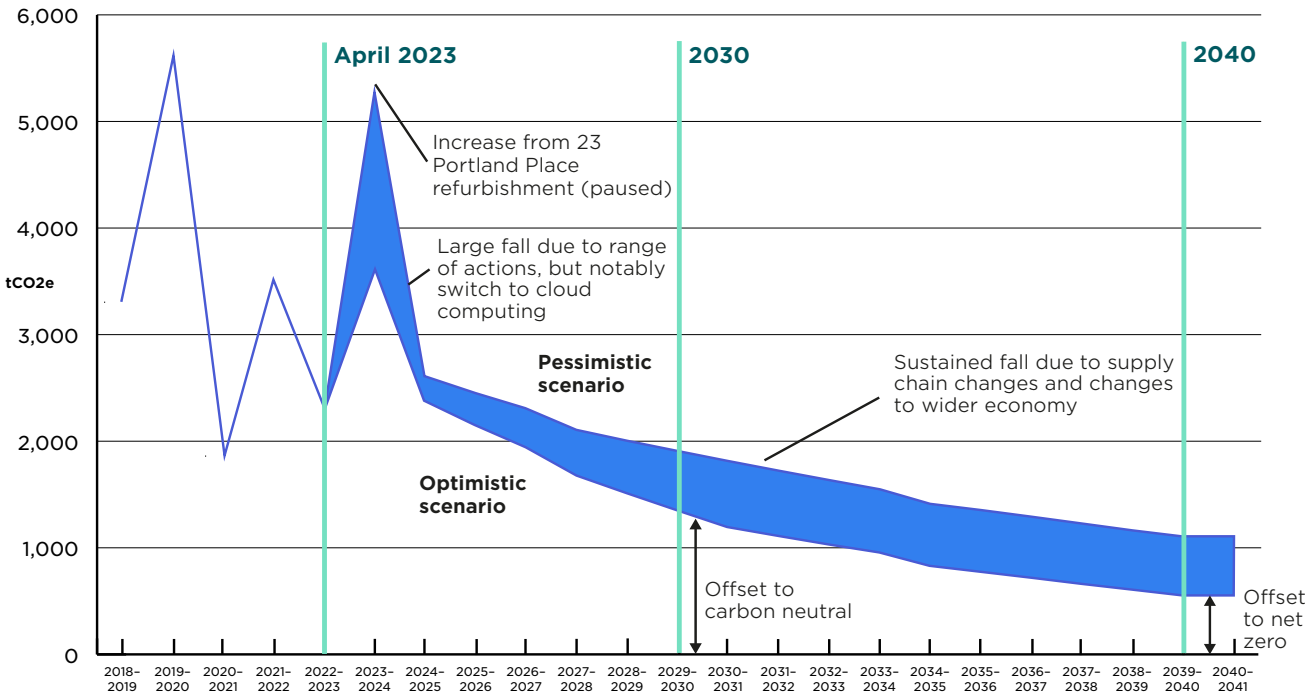
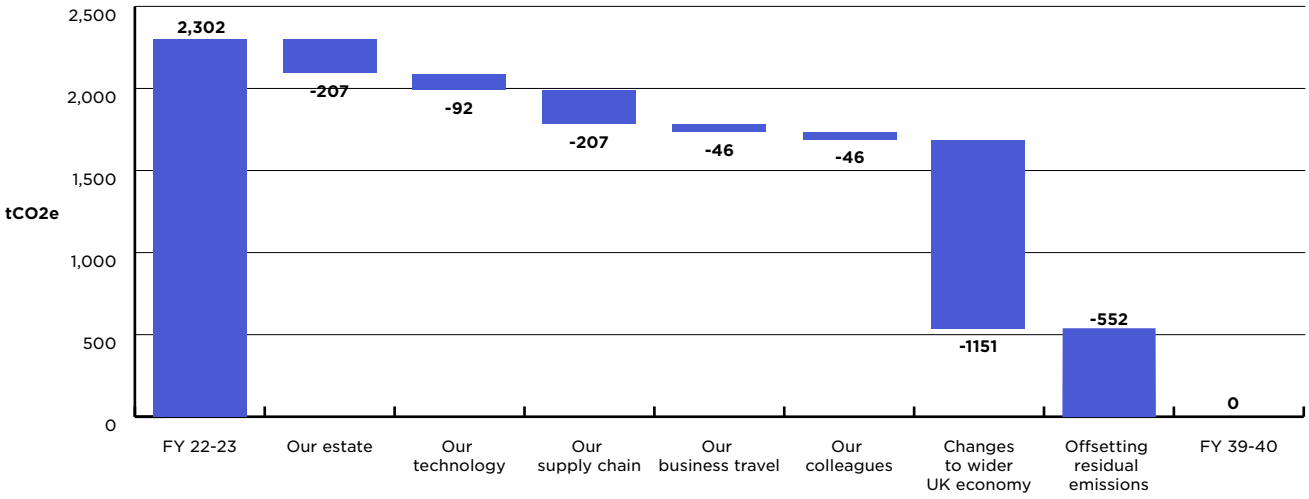


Figure 6 - Contribution of priority areas to journey to net zero for all scopes



Promoting sustainable practice among nurses, midwives and nursing associates

The NMC has significant opportunity to influence the UK health and social care sector due to our direct line to over 808,000 nurses, midwives, and nursing associates, our standards for and relationship with education providers, and our collaborative relationships with employers, including many NHS organisations.

We therefore have the opportunity to promote environmental sustainability far beyond the boundary of our organisation.

As outlined in the table below, our approach to promoting sustainable practice among nurses, midwives and nursing associates across the UK centres around our three core functions: Regulate, Support and Influence. We will take a phased approach to this work, focusing on Influence first, then Support and then Regulate.

The Influence phase will enable us to set out our intent in this area and build awareness of the importance of sustainability issues among nurses, midwives and nursing associates before implementing any changes to our Code or other standards. The communications around the launch of this Environmental Sustainability Plan will be important here, ensuring we use the full range of communication tools at our disposal to emphasise the importance of this agenda. This includes our newsletters, social media, potential roundtable events on sustainability and direct conversations with employers through our Employer Link Service.

The Support phase will build on this by helping professionals on our register to understand what best practice for practising in a sustainable way looks like. This will involve collaboratively developing supporting information on sustainable practice, aiming to work in partnership with other regulators, Chief Nursing Officers and employers to ensure we effectively capture best practice in this area.

	Key area	Action
Regulate	**1. The Code**	Consult with stakeholders to include appropriately braod set of regulatory expectations in the Code on practising in a sustainable way for all the professionals on our register.
	2. Standards of proficiency (pre-registration)	Proficiency documents to include expectation (after consultation) on sustainable practice (in terms of knowledge, skills, behaviour, attributes) in line with professional scope of practice for nurses and nursing associates. Consider refining or aligning wording in existing midwifery proficiency document.
	3. Standards for education and training	Add an expectation (after consultation) in our education standards (Part 1 Education framework for nursing and midwifery education) to encourage and support sustainable practices in the design and delivery of NMC approved education programmes.
	4. Standards of proficiency (post-registration)	Consider refining, aligning or adding (after consultation) to existing requirements in the post-registration proficiency documents to include expectation on sustainable practice (in terms of knowledge, skills, behaviour, attributes) in line with professional scope of practice with a particular consideration for NMC professionals in specialist or leadership roles.
Support	**5. Guidance or supporting information**	Develop guidance (underpinning the Code) what practising in a sustainable way looks like for nurses, midwives and nursing associates and/or develop supporting information on good practice in sustainable nursing and midwifery practice.
	6. Revalidation	Consider including prompts in revalidation requirements to encourage reflection on practising in a sustainable way in line with professional scope of practice.
Influence	**7. Communications**	Communicate why sustainability in nursing and midwifery matters and what sustainable practice looks like, through general and targeted communication tools such as newsletters, social media, stakeholder engagement (NMC led and external).

Finally, once we are sure the nurses, midwives and nursing associates we regulate understand the importance of sustainability and what best practice looks like, the Regulate phase will enable us to set formal sustainability requirements for both professional practice and education. Our standards, including the Code, should reflect the key issues of modern society. As outlined in the table above, we will therefore develop and include wording that reflects the commitment to 'practising in a sustainable way' into all of our standards. We will aim to incorporate this into our review of the Code and into our education standards by 2029 if not earlier.

Importantly, this will initially be expressed in the Code as a 'best practice' issue rather than a fitness to practise issue. This means we would not expect any nurses, midwives or nursing associates to face fitness to practise proceedings as result of not practising in a sustainable way. Once more, we will work collaboratively with other regulators, Chief Nursing Officers and employers to update these standards.

Building our resilience to climate risks

The average surface temperature in the UK has risen by 1.2°C since pre-industrial times, and further warming is predicted under all decarbonisation pathways set out by the Intergovernmental Panel on Climate Change.[19]

While we aim to limit warming to 1.5°C, the evidence shows that we must be prepared for warming up to 4°C.

As required by the Climate Change Act 2008, the UK government has assessed the risks of climate change to the UK, identifying sixty-one climate risks cutting across multiple sectors of our society. It identifies a wide range of potentially costly impacts of climate change including on health, productivity and infrastructure, affecting many of our households, businesses and public services.

Climate risks to organisations may be 'locked in' over time by decisions that do not factor in climate change, on operating models, site locations, infrastructure, supply chains, technology, or policies. Therefore, we must build climate change into any decisions that have long-term effects, such as in new infrastructure, to avoid often costly remedial actions in the future.

Therefore, as recommended by the IPCC and UK Government, our Environmental Sustainability Plan must consider actions we can take to adapt to climate change risks, alongside actions to reduce our environmental impact.

We have identified risks associated with: (1) our estate, (2) social infrastructure, (3) health, wellbeing and productivity of colleagues, (4) our investments, and (5) the UK health and social care sector and professionals. The table below outlines the key risks in these areas and the mitigative actions we intend to take.

As with the management of all our risks, developing our understanding and assessing the risks posed by climate change, needs to become an ongoing part of our thinking, not a one off activity. We will therefore add these climate risks to our corporate risk register to make sure we are giving them due consideration in all our future decision-making.

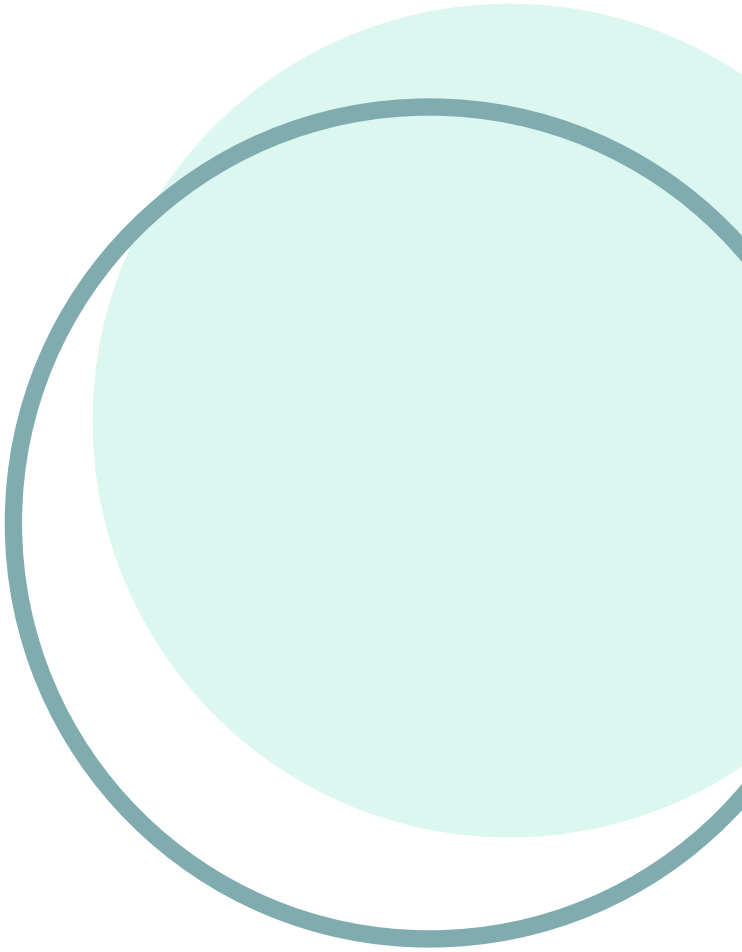
19 Intergovernmental Panel on Climate Change. Climate Change 2021: The Physical Science Basis.

	Risk	Mitigations
Our estate	1. Risks to business sites from **flooding**	Ongoing assessment of flood risk at all sites; Updating business continuity plan as necessary; Ensure appropriate insurance in place; Appropriate siting of new buildings
	2. Risks to building fabric from **other extreme weather**	Updating business continuity plan as necessary; Ensure appropriate insurance in place
Social infrastructure	3. Risks to **water supply** from reduced availability and other cascading failures	Install rainwater harvesting facilities; Install water efficient appliances
	4. Risks to **transport infrastructure** from flooding, extreme weather and other cascading failures	Building remote working capabilities; Updating business continuity plan as necessary
	5. Risks to **energy infrastructure** from flooding, extreme weather and other cascading failures	Updating business continuity plan as necessary; Implementing energy efficiency measures
	6. Risks to **ICT and digital infrastructure** from flooding, extreme weather and other cascading failures	Updating business continuity plan as necessary; Review of resilience planning of suppliers
	7. Risks to business from disruption to **supply chains**, including international trade routes	Updating business continuity plan as necessary; Supply chain diversification; Choosing local suppliers where possible
Health, wellbeing and productivity of colleagues	8. Risks to health wellbeing and productivity of colleagues from **high temperatures**	Insulation, natural ventilation and air conditioning in buildings; Relaxed requirements for dress codes and working hours; Flexible desk booking policy; Guidance on travel in high temperatures

	Risk	Mitigations
Health, wellbeing and productivity of colleagues	9. Risks to health of colleagues from **infectious disease, vector-borne disease and sanitation**	Resilient business continuity plans to cover sick absense; Clear sickness absence policy
	10. Risks to health, wellbeing and productivity of colleagues due to **infrastructure disruption**	Building remote working capabilities; Routes for colleagues to raise wellbeing concerns
Investments	11. Risks to **finance and investment and insurance** including access to capital for business	Diversified portfolios, with resilience to climate risks assessed for each investment
The UK health and social care sector and professionals	12. Risks to **delivery of health and care services** from infrastructure failures	Consideration of risk and associated proficiencies required by nurses, midwives and nursing associates in standards; Guidance for adapting to risks; Limiting engagement with nurses, midwives and nursing associates in periods of high operational pressure
	13. Risks of **increased demand on health and care services** due to climate-related health risks	Considerations of risks and associated proficiencies required by nurses, midwives and nursing associates in standards; Guidance for adapting to risks; Limiting engagement with nurses, midwives and nursing associates in periods of high demand
	14.Risks to **health and wellbeing of nurses, midwives and nursing associates** from climate-related health risks	Flexibility in timings and locations of FtP headings; Guidance for adapting to risks

We are particularly mindful of the fact that climate change – and the associated risks to human health – is likely to place nurses, midwives and nursing associates under increasing pressure and stress. In line with our values as a regulator, we must always be considerate of the pressure professionals on our register are under when planning our activities. This might include limiting engagement with those on our register in periods of high operational pressure. In the past, this has been particularly pertinent during winter pressures; however, moving forwards, periods of high temperatures mean we may have to similarly scale back activity in the summer.

The risks climate change poses to the health and social care sector may also prompt us to consider these risks and associated proficiencies required by nurses, midwives and nursing associates in our standards, or develop guidance and/or supporting information to help professionals adapt their practice to climate-related risks.



Delivering our plan

Developing an effective programme

To deliver on this plan, we will develop a Sustainability Action Group, building on the Sustainability Working Group which developed the plan. This will report to the Executive Board. It will be convened by the Assistant Director of Finance and Audit and include representatives from the Estates team, the Procurement team, and each of the directorates.

The programme will be divided into a series of key workstreams, each with a named lead. The Sustainability Action Group will meet to understand the progress made, collaboratively overcome barriers, and coordinate reporting to the Executive Board and Council.

This will be an iterative process, and this Environmental Sustainability Plan should therefore be considered a 'live' document, which adapts to our changing circumstances as we work towards our targets (although importantly we will not look to change our targets moving forwards).

Reporting our progress

To successfully deliver on our plan, we need to be able to measure our progress against our core targets: to reach net zero in Scope 1 and 2 emissions by 2035 and in all emissions by 2040.

We have developed our estimate of our greenhouse gas emissions, water use and waste generation from 2018-19 to 2022-23, using a combination of operational data and assumptions. However, we can do more to improve the accuracy of these estimates moving forwards through improved data collection. We will therefore systematically collect the data we need to generate more accurate estimates moving forwards. This will include working with partners such as our building managers and key suppliers alongside undertaking a periodic staff sustainability survey to understand more about commuting, homeworking and office use. We will calculate our environmental impact in line with UK Government guidance[20] for each financial year to feed into our annual reports, which are publicly available.

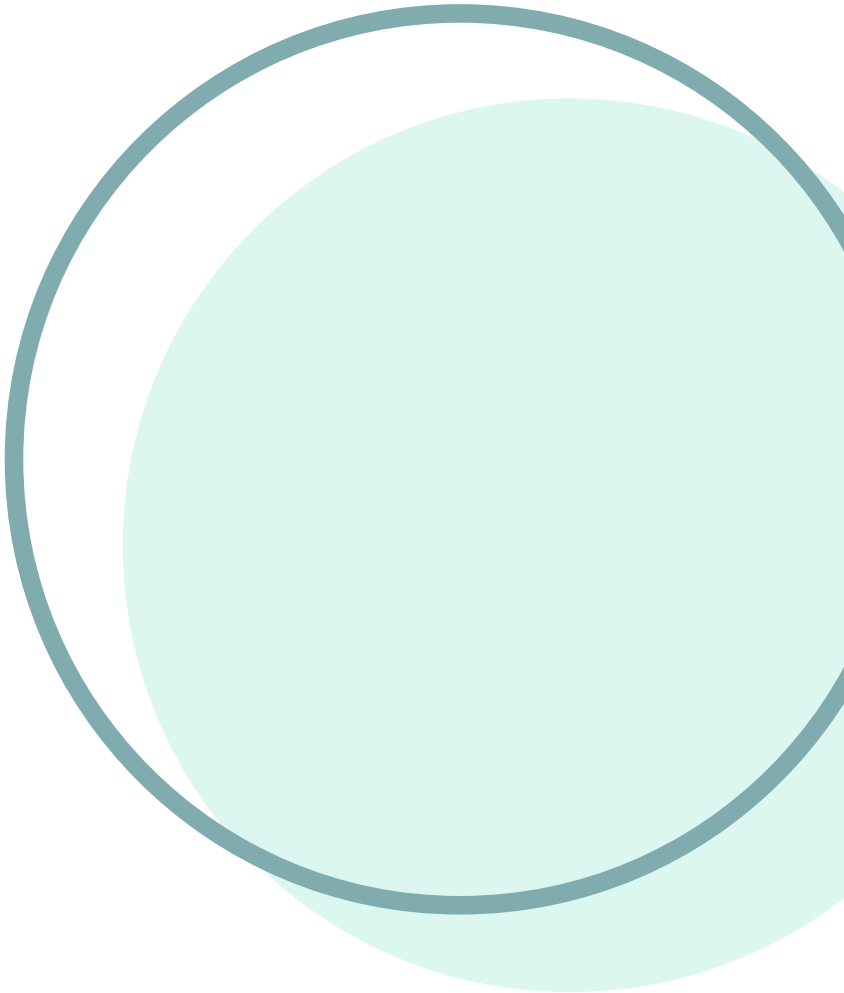
The Sustainability Action Group will also report our progress against each of our targets in our priority areas to our Executive Board and Council on a more regular basis.

20 HM Government, 2019. Environmental Reporting Guidelines: Including streamlined energy and carbon reporting guidance.

Engaging our colleagues

In line with our values, our Environmental Sustainability Plan is ambitious, requiring change across many areas of our organisation. We therefore must take a collaborative approach to delivering it, engaging meaningfully with colleagues from across the NMC.

We have set the tone through our consultation process for developing this plan. We will now ensure that in each of our priority areas we engage a range of colleagues in the delivery process, ensuring their views feed into everything that we do. We will also provide regular updates on our progress to colleagues, as outlined in the ‘Our colleagues’ section.



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