

Our Commitment to a Greener Future

Environmental Sustainability Policy and Procedure (including Net Zero commitments)



Purpose and Intent

The Education Training Foundation (ETF) is committed to improving our performance, reducing our carbon emissions and implementing best practice to reduce the environmental impacts of our charity and operations and enable our net zero journey. It is also committed to promoting environmental sustainability across the Further Education and Skills sector as part of ETF being the Professional Body for the sector.

The objective of this policy is to:

- Implement environmental, sustainability and net zero actions as a responsible employer and buyer of products and services.
- Monitor the environmental actions and improvements internally.
- Reducing the carbon footprint of our employees.
- Demonstrate leadership by working sustainably with suppliers, communicating with customers and recommending industry-relevant environmental initiatives.
- Signpost to our work to promote sustainability across the sector.

This policy also supports the following objectives from the Government's Social Value Model (Theme 3):

- Fighting Climate Change
- Effective stewardship of the environment

This Environmental Sustainability Policy formalises our commitment to net zero and supports the principles of environmental sustainability, acknowledging that a sustainable environment is at the core of our organisation and integral to the lives and work of our employees. It serves as a guiding framework for preserving the environment, protecting nature, biodiversity, reduces our impacts, preventing pollution, and addressing climate change.

Embedding sustainability in ETF's work aligns with our safeguarding responsibilities - protecting the physical and mental wellbeing of current and future generations, promoting resilience, and ensuring the right to a safe, healthy environment. ETF recognises that climate change presents significant risks to the safety, wellbeing and future welfare of communities.

We are committed to accelerating the move to net zero.

Scope

The Environmental Sustainability Policy applies to all employees and contractors, both full time and part time. The Policy is also applicable to suppliers, partners and consultants and other third-parties, to demonstrate and indicate best practice.

ETF's work with the sector on Environmental Sustainable Development is not in scope. Our work in this space is covered here: [Explore ESD at ETF | Development & Training | Education Training Foundation](#)

Further work is underway to develop broader Social Value commitments, including broader sustainability considerations.

Our commitment

At ETF, we will work towards the 2030/31 targets set out later in this paper. We will:

Policy & Governance

- Promote environmental responsibility throughout our charity and communicate and implement this policy at all levels within the workforce, into our supply chain and to customers.
- Allocate sufficient resources to uphold our commitment to this policy and environmental sustainability.
- Comply with all relevant environmental legislations/regulations, maintaining a Legal Register to record compliance.
- Ensure that all our services are developed in a way that is complementary to this policy.
- Define and communicate responsibilities to management, employees and contractors ensuring everyone is aware of their individual obligations.

- Prepare and promote our environmental policy and action plan.
- Work with environmental specialists as required.

Operations & Supply Chain

- Assess the environmental impacts of our operations and set targets and long-term goals for continuous improvement. We will regularly review these targets.
- Proactively reduce environmental impact within our procurement and supply chain, and where we can go beyond.
- Monitor and reduce utilities consumption in office buildings and home working and measuring impact of supply chain and company travel.
- Where appropriate, increase recycling practices and optimising use of technological equipment.

Education & Engagement

- Promote environmental awareness and sustainable practices across our education and training activities, embedding sustainability within learning design, professional development, and learner engagement.
- Encourage all partners and other key stakeholders to commit to improving environmental performance.
- Set up an Environmental Sustainability Focus Group internally, sponsored by a senior leader, to encourage employees to make suggestions and decisions on operational practices.

Travel & Accommodation

- Move to reduced-size accommodation in January 2027 that offers a lower carbon footprint.
- Agree a target on the level of travel required and provide direction on the preferred modes of travel, encouraging lower carbon transportation options both for employees and suppliers. We will incentivise the use non-petrol or diesel methods of transport (see below Green Travel Initiatives).
- Enable, promote, encourage, and rewarding low carbon travel choices.

Reporting & Standards

- Report our environmental performance in our annual report.

- Work towards achieving ISO 14001 (Environmental Management Standard) accreditation by 2030 (see Annex B), which some funders have as a pre-requisite requirement to bid for contracts / funding.
- Ensure the correct level of 'offsetting' is in place to neutralise carbon emissions, but only as a last resort where we have been unable to avoid carbon intensive activities, operate more efficiently or replace or mitigate any residual emissions. Only high quality removal credits used after a minimum of 90% reductions against baseline, aligned with the Science based targets initiative.

Responsible Use of AI

- Publish guidance on how to reduce the environmental impact of using AI (see Annex A).

As an employer and buyer we will:

- Share expectation of responsibility for the environment to our employees, board and service providers.
- Demonstrate clear commitment to the environment and lead by example, to ensure that the protection of the environment is promoted to all employees.
- Ensure expenses and procurement systems to capture data that enables us to monitor energy usage.
- Continue to work with the Climate Action for Associations (CAFA) for advice, information, guidance and services related to this policy.
- Review this Environmental Sustainability Policy annually and measuring targets and performance as part of that review.

Our employees will:

- Be familiar with the environment impact and requirements relevant to their own role and activities and take responsibility for their own impact on the environment.
- Make conscious decisions to follow best practice and reduce high intensity business activities and support our company's journey to net zero.
- Offer suggestions and ideas to better these policies and practices.
- Engage in an annual calendar of short internal learning designed to strengthen individual and collective understanding of environmental sustainability, on top of online learning available on demand through our employee learning platform that aims to maintain high levels of carbon literacy.

- Take personal responsibility for understanding the environmental impact of their role and adopting everyday sustainable actions, including adopting greener travel (I Do).
- Share and apply good practice by collaborating with colleagues to embed environmental sustainability principles into projects, resources and ways of working (I Share).
- Act as influencers by identifying and championing opportunities to integrate environmental sustainability and reducing carbon emissions into ETF's culture, policies and partnerships (I Influence).

Our suppliers will:

- Provide their own environmental policies to demonstrate their emissions footprint and carbon reduction targets, where possible.
- Work in collaboration where possible to reduce the overall environmental impact of the supply chain.
- **Supplier Selection:** Sustainability will be considered as an evaluation criterion during most tendering activity, including capturing sustainability policies, carbon footprint reporting, or certifications.
- **Supplier Carbon Reduction Commitments Measurement:** All suppliers (excluding Associates) will be required to complete a carbon emissions questionnaire at the point of being awarded a new contract with ETF. This questionnaire will capture key practices and data to understand the level of commitment around reducing emissions, which may inform our influencing and incentivising work (to encourage reducing emissions within our supply chain). Suppliers with existing contracts will be required to complete the questionnaire every time they are awarded an extension or variations worth over £30,000. Where this is not possible, an exemption and rationale needs to be documented.
- **Associates:** ETF will provide a Greener Travel Guide to all Associates annually that references good practice, ETF's approach and expectations we have when carrying out work with ETF. This will likely include access to preferential rates with our Greener Travel initiative providers (see below).
- Communicate this Environmental Sustainability Policy to all employees, contractors and other stakeholders as well as making this policy available to the public.

Greener Travel Initiatives

As part of our sustainability objectives, ETF will include in most bids requiring car travel a clear commitment to reducing carbon emissions through the following measures:

1. Green Car Lease Scheme paid for by employees via salary deductions

Employees working on the contract will be offered access to a **Green Car / Electric Vehicle Lease Scheme** as an employee benefit. This initiative may also be extended more broadly across the charity to go further with reducing carbon emissions and demonstrate our commitment to lowering the carbon footprint of contract and customer delivery.

Key Benefits:

- **Environmental Impact:** Electric vehicles (EVs) produce zero tailpipe emissions, significantly reducing greenhouse gases compared to petrol or diesel cars. According to the UK Department for Transport, EVs can cut lifecycle emissions by up to 70% compared to conventional vehicles.
- **Employee Advantage:** Employees can use the leased EV for personal travel outside of work, further amplifying emission reductions and promoting sustainable living.
- **Corporate Responsibility:** Aligns with government targets for net-zero emissions and enhances our reputation as a socially responsible organisation.

Most suppliers offer options should the employee leave employment (particularly relevant for colleagues on fixed term contracts). For example, moving to direct debit to keep the car. This is less tax efficient way of having an electric vehicle, but keeps options open. Our hope is that more employers offer this benefit so the benefit is “portable”.

2. Green Hire Cars paid for by ETF (via a preferred vendor)

This policy supersedes a policy that does not allow the hiring of electric vehicles for long trips or where more than one employee is travelling on the journey.

For roles requiring car travel for business purposes, ETF will allow the hire of **electric or hybrid vehicles owned by ETF** to ensure emissions are minimised beyond voluntary employee uptake.

A preferred national supplier pay-as-you-go will be procured, with the contract only allowing the hire of electric or hybrid vehicles.

Why This Matters:

- **Measurable Impact:** Transitioning from petrol or diesel to electric vehicles reduces CO₂ emissions per mile by approximately 50–70%, which is easy to track and report.

- **Compliance and Leadership:** Supports compliance with emerging low-emission regulations and positions ETF as a leader in sustainable practices within the sector.

3. Low-Carbon Travel Policy Directive (Applicable to Selected Contracts)

This directive, to be deployed in selected bids, establishes clear rules to ensure that employees use only low-carbon travel options. Acceptable modes include:

- Personal hybrid or electric vehicles
- Hiring hybrid or electric vehicles (hire cars or taxis paid for by ETF)
- Public transportation
- Cycling
- Walking

There will be a directive to not use petrol or diesel vehicles in the delivery of the contract.

Exceptions should be rare and must still aim to minimise environmental impact (e.g., car sharing if using petrol / diesel vehicles). Exemptions may be, however, required to support reasonable adjustments to support colleagues with a disability (e.g. specially adapted vehicles).

4. Cycle to Work Scheme

A Cycle to Work Scheme is already in place at ETF.

Why These Approaches Are Essential:

Transport accounts for nearly **24% of UK greenhouse gas emissions**, with cars being the largest contributor. By adopting green vehicle solutions, ETF can significantly reduce its environmental impact, meet client sustainability expectations, and contribute to national and global climate goals.

2030/2031 Targets (following advice from CAFA)

ETF Emissions and Energy Consumption Summary (see annual report for breakdown)

Emission source	2024-25	2021-2022	Unit of measurement
Total gross emissions (market based)	1597.33	7710.85	tCO₂e
Normalisation metric	133	140	FTE
Intensity ratio	12.01	55.08	gross tCO₂e/FTE

ETF's greenhouse gas emissions for 2024–25 were 1597.33 tCO₂e (market based), representing a 79.28% reduction from 2021-22 baseline. The predominant reason for this reduction is an increase in the accuracy of calculating scope 3 category 1 (purchased goods and services), combined with a 40% reduction in spend. Reductions of 30.4% from gas and electricity consumption over the same period reflects the ongoing effectiveness of our energy management and sustainability measures.

Our 2030/31 intensity target is ambitious and is predicated on two parallel tracks: (1) achieving the quantified operational reductions listed below, and (2) fundamentally improving the accuracy of our largest emission source (supply chain) through supplier engagement, which we anticipate will account for the majority of our footprint reduction.

Our emissions intensity ratio target (that tracks headcount) for 2030/31 is:

6.5 to 9.5 tCO₂e per FTE (6.5 tCO₂e is a stretch target)

This will be achieved by the actions listed in this policy, to highlight the main actions:

- Office move (estimated reduction potential of 12 tCO₂e)
- EV salary sacrifice scheme (potential reduction of 12.1 tCO₂e)
- Mandating low carbon business travel and electric car leasing (max reduction 35.27 tCO₂e)
- Supplier engagement and questionnaires for new contracts (biggest area of reductions, but hard to quantify at this stage. Target reduction of 600 tCO₂e pa)

Responsibility and review

This Our Commitment to a Greener Future is sponsored by the Associate Director of People & Workplace and was adopted by the Executive Board of ETF on 1 December 2025.

Implementation of this Environmental Policy is the direct responsibility of the board and senior leaders, and indirectly, all directors, employees and contractors working for ETF.

This policy was last updated on 1 December 2025 and will be next reviewed on 1 December 2026.

Useful links

[Home | Climate Action For Associations](#)

[Race to Zero](#)

[Climate Ambassadors: Turning Climate Ambition into Climate Action in Education | Climate Ambassadors](#)

[Social-Value-Model-Quick-Reference-Table-Edn-1.1-3-Dec-20.pdf](#)

Policy Sponsor:

Michael Lowe - Associate Director of People & Workplace

With special thanks to contributions from ETF colleagues.

Annex A: Guide to adjusting AI usage and queries to reduce environmental impact

Altering how AI systems and alternatives are used can save energy. Here are some suggestions from CAFA:

- **Identify Alternatives:** Before using AI, determine if a traditional search engine (e.g., Google) would suffice. Avoid using high-energy-consuming AI models for simple tasks. A task specific AI model e.g. for translation, is far more efficient than a general model like GPT.
- **Avoid Use of Image and Video Generation:** Image generation consumes up to 100 times more energy than text generation. This is dependent on image size, resolution and complexity. It's also fair to say that AI images lose impact and purpose. Not only that, graphic designers and animators do a better, more authentic job! However, this needs to be balanced with the energy consumption through production.
- **Optimise Prompts to Reduce Iterations:** Improving prompt efficiency with generative AI saves energy by reducing the number of iterations required to achieve a satisfactory result, thereby limiting energy-hungry generations (Brandtech Group 2025).
- **Be Concise and Limit Output Size:** Energy consumption and runtime are strongly correlated with the size of the output (Brandtech Group 2025; Luccioni, Jernite, and Strubell 2024). Users can ask for shorter outputs in prompts, using phrases like "be concise" or "limit your answer to approximately 100 words," to reduce impact and cost (Brandtech Group 2025).
- **Avoid Overuse of Generative Tasks:** Recognise that tasks that generate new content (text generation, summarisation, image generation) are significantly more energy and carbon intensive than simpler discriminative tasks (Luccioni, Jernite, and Strubell 2024).
- **Start New Chats for Unrelated Questions:** Longer chat sessions consume more energy because the model must process the entire history (all previous tokens) for subsequent generations (Brandtech Group 2025).
- **Regularly Delete Old Chats:** Just like emails and inactive tabs, old chats use energy due to needing to be stored. Data storage in paper is passive in the sense that once the data is stored, it remains stored without additional energy for the data to keep being stored. Data storage in data centres is active, in the sense that energy is continuously required to keep the data available for retrieval.

References

- Brandtech Group. 2025. Generative AI Environmental Impact Study.
- Luccioni, Alexandra Sasha, Yacine Jernite, and Emma Strubell. 2024. "Power Hungry Processing: Watts Driving the Cost of AI Deployment?" In ACM Conference on Fairness, Accountability, and Transparency (ACM FAccT '24), 85–99.

Annex B: Key High-Level Requirements for ISO 14001 (Environmental Management Standard)

To achieve ISO 14001 certification, ETF needs to implement an Environmental Management Standard that meets the standard's requirements. It is likely to take 6 – 12 months at reasonable pace without dedicated resource. At a high level, this involves:

A. Leadership & Commitment

- Senior management must demonstrate commitment to environmental performance.
- Define roles, responsibilities, and resources for the EMS.

B. Environmental Policy

- Create a formal policy that commits to compliance, pollution prevention, and continual improvement.

C. Planning

- **Identify environmental aspects and impacts** (e.g., energy use, waste, transport).
- **Legal and compliance obligations:** Understand and document all applicable environmental laws.
- **Set objectives and targets:** Measurable goals aligned with the policy.

D. Implementation & Operation

- Develop documented procedures for significant environmental aspects.
- Train staff and raise awareness.
- Establish communication channels (internal and external).
- Control operations and suppliers to minimize environmental impact.

E. Performance Evaluation

- Monitor and measure key environmental indicators.
- Conduct internal audits.
- Management reviews to ensure effectiveness.

F. Continual Improvement

- Corrective actions for non-conformities.
- Ongoing improvement of the EMS.