

Sustainable development in higher education: Consultation outcomes

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Consultation process

1. The framework was drafted in the spring of 2013, and was considered by HEFCE's Leadership, Governance and Management Strategic Advisory Committee in May and the HEFCE Board in July. It was issued for consultation on 1 November 2013, with a deadline of 7 February 2014. Consultation events were held in Leeds and London during January 2014. Annex A contains a report on the events and quotations from written consultation responses.

Provenance of written consultation responses

2. In total there were 69 responses, five of which arrived after the deadline. The late responses have been read and their views considered, but they have not been included in the quantitative analysis. Annex B provides a list of the respondents.

Table 1: Respondents by type

	Responses	%
HEFCE-funded higher education institutions	50	72
Other higher education providers	3	4
Further education colleges	0	0
Representative bodies	6	9
Professional, statutory or regulatory bodies	2	3
Independent	2	3
Students, prospective students and student advisers	5	7
Consultants	1	1
Total responses	69	

Analysis of consultation responses

General remarks

3. Respondents felt that progress had been made on the vision as articulated in 2005, but the level of achievement was considered variable between and within institutions. The influence of carbon plans and targets has put the focus on operational estates issues, and more work is needed on curriculum.

4. Respondents thought that the sector was not recognised for what it had achieved, although the research-intensive universities drew attention to the high profile of their

research. One respondent considered that the private sector was receiving recognition because of better publicity.

5. Curriculum was identified as the area where most work was needed. One comment summarised a common view:

'The integration of sustainability into courses has not been very widespread. Whilst many modules are being developed that consider sustainability issues, they are often bolted on to courses that have changed little for many years. Instead of sustainability being a separate module, a reconsideration of all aspects of courses is needed to change the emphasis towards the requirements of the new ways in which things must be done. However, we recognise that this is not an insignificant task.'

6. HEFCE's contribution to galvanizing the sector by setting institutional targets is widely recognised. Our influence is also apparent in the attention being paid to Scope 3 emissions, but outside these areas we are considered to have had little effect, particularly on the social justice, human rights and ethical dimension of sustainable development, where less progress is discerned by respondents. One university observed:

'Some of the initial momentum provided by HEFCE engagement has since diminished, particularly since the departure of HEFCE's Senior Policy Advisor for Sustainability and the disbandment of the steering group.'

7. Respondents were generally content with the revised vision, though they would like a timeframe and some performance measures to be associated with it. Respondents fall broadly into two groups: the environmental officers and the strategic managers (29 and 14 respondents respectively). The former would typically like to see the framework as a call to arms behind which they can rally as a means of enhancing their institution's sustainable development (SD) performance, while the latter are more likely to recognise potential tensions for example between the independence and autonomy of institutions and possible roles for HEFCE in advancing education for sustainable development (ESD). This second group also acknowledged the limits of HEFCE's influence.

8. Observations on the Revolving Green Fund broadly reflect those of the recent 'Evaluation of rounds 1 to 3 of HEFCE's Revolving Green Fund'¹: for example, an appreciation of the longer payback periods on projects and of extending the terms of the fund to include water projects.

9. ESD emerged as a theme that many respondents would like to see addressed, and there was considerable support for building more sustainability into the Research Excellence Framework (REF), since this is seen as a driver of institutional behaviour. Perhaps surprisingly, given that enhancing the economy might be perceived as a major motivation for public investment in higher education, there was little comment about the theme of the sustainable economy. There was little comment on the use of data analysis to promote sustainable development, but some support for benchmarking internationally and outside the sector.

¹ Available online at www.hefce.ac.uk/pubs/rereports/year/2014/rgf1to3/

10. An analysis of the responses to individual questions follows, with a note on how HEFCE will work in each area. Annex C contains a summary of HEFCE actions showing changes following the consultation.

Consultation question 1

In 2005 we set out a vision (updated in 2009) of how higher education could contribute to sustainable development:

*'Within the next 10 years, the higher education sector in this country will be recognised as a major contributor to society's efforts to achieve sustainability – through the skills and knowledge that its graduates learn and put into practice, its research and exchange of knowledge through business, community and public policy engagement, and through its own strategies and operations.'*²

With the end of that 10-year period approaching, to what extent do you agree that this vision has been realised?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
1	22	23	10	0
41%		41%	18%	

11. Respondents commented that progress had been made, but was variable, and that the higher education sector was not generally recognised for the extent of its contribution, except perhaps for its research. More could be done to promote sustainability in the curriculum, and HEFCE's work had been helpful in providing a stimulus to the sector, but a stronger framework might be needed if this momentum were to be maintained. Some respondents commented that it was difficult to measure progress and felt the need for an independent evaluation.

12. The following comments were made:

'A lot of good work is happening, SD is much more mainstream than ever before, and HEFCE should definitely take a lot of the credit for this. But most SD activity is still focused on doing less bad via estates, not yet focused on doing more good through graduates as people who will hold positions of influence.'

'Too often sustainable development is still considered a marginal activity or loses out to competing priorities, with student experience, student numbers, financial sustainability, estates development and league tables more often the focus of leadership teams across the sector.'

² 'Sustainable Development in higher education' (HEFCE 2005/28), available at http://webarchive.nationalarchives.gov.uk/20100202100434/http://hefce.ac.uk/pubs/hefce/2005/05_28/ and 'Sustainable development in higher education: 2008 update to strategic statement and action plan' (HEFCE 2009/03), available at www.hefce.ac.uk/pubs/year/2009/200903/

'The sector generally does not operate in a sustainable way, its decision making relating to development, growth and overseas engagement, are not always made with sustainable considerations to the fore and a majority of graduates still leave university without any reference points to sustainability. This is a sector still on this journey, though action to date is positive.'

'We believe the higher education sector is a major contributor to society's efforts to achieve sustainability, however, we are less convinced that the sector is recognised as such. Our success stories tend to be the stories of individual institutions and there has been no concerted campaign to promote the achievements of the sector overall.'

'The Higher Education sector has a responsibility to play a leadership role on this issue, given its unique position and the reach and degree of the consequences associated with (un)sustainable development.'

HEFCE response

The purpose of this question was to measure perceptions of progress. We do not intend to undertake a formal evaluation of progress, because of the cost and complexity of doing so and the uncertain benefits. We do, however, recognise the importance of communication, and have included within the framework an additional action to publish a report on progress in 2017.

Consultation question 2

To what extent do you agree that HEFCE's engagement has contributed to sustainability in higher education?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
8	40	6	0	0
89%		11%	0	

13. The majority of respondents were positive about HEFCE's contribution to sustainability, but indicated that momentum needed to be maintained. There was broad support for the work with students and the National Union of Students' (NUS') Students' Green Fund, although some felt that this did not go far enough and that greater focus was needed on ESD and the curriculum.

HEFCE response

We are pleased and encouraged by the clear perception that HEFCE engagement has made a positive difference.

Consultation question 3

Do you agree that this revised vision is appropriate?

‘Our vision is for universities to be widely recognised as leaders in society’s efforts to achieve sustainability – through the skills and attitudes that students gain and put into practice, through research and knowledge exchange, and through universities’ own business management.’

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
8	31	8	8	0
71%		14.5%	14.5%	

14. The majority of respondents agreed with the general tone of the vision, although there were a number of requests for additions, such as the inclusion of curriculum, staff, a timeframe, performance indicators and reporting.

15. Specific points for further consideration included:

- concern about the change in wording from ‘sector’ to ‘universities’
- concern that the vision was derived from the previous one
- a feeling that community engagement should be added
- desire for clarity about whose recognition was being sought, and whether recognition was more important than action
- a feeling that the vision did not easily translate into proposed actions
- a wish for an acknowledgement of the sector’s role in shaping policy.

16. One respondent felt that:

‘The London consultation event [...] provided an excellent example of an SD strategy from outside the sector that had been substantially reframed to be more positive (“Saving Carbon, Improving Health”) and perhaps a more substantial reframing is also required in the HEFCE Framework, however, a longer period of consultation may be required to achieve this.’

HEFCE response

We have amended the vision to include the ‘understanding’ of students and ‘community involvement’. A reference to the ‘strategies and operations that bring all these together’ is intended to highlight the synergies between different aspects of sustainability.

The action plan will include timescales.

Consultation question 4

Do you agree with our appreciation of the issues and the actions we propose, as outlined in the framework?

Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree
1	30	3	9	0
47%		23%	14%	

17. The majority of respondents agreed with our appreciation of the issues:

‘These, as a brief overview, seem well formulated and likely to lead towards the overall strategic aims associated with sustainable development within higher education.’

18. It is possible that the strength of agreement was muted because of the breadth of the issues and the 19 actions contained within the draft framework. For example, one institution that responded ‘neither agree nor disagree’ added that the framework showed ‘a mostly sound appreciation of the issues as demonstrated in the majority of the actions proposed’.

19. Those who had difficulty with our appreciation of the issues and the actions often had concerns about the approach to areas such as teaching, research and leadership. There were calls for greater coverage of community engagement. One respondent pointed to a recent New Economics Foundation report which had valued the social impact of universities within communities at £1.3 billion. These issues are explored in more detail below. There were also general points about;

- the lack of a holistic approach reflecting potential synergies
- the lack of reference to the challenges of internationalisation
- an overly environmental emphasis
- the absence of timeframes or prioritisation of actions
- the need for a more inspiring document
- the benefits of greater evaluation.

20. The Environmental Association for Universities and Colleges welcomed the framework and valued HEFCE’s commitment, but was concerned that;

‘HEFCE’s approach isn’t aspirational enough in regard to leadership, ESD, research and carbon reduction targets... the Framework reflects the agenda still as only a “nice to have” at best and at worst “an irrelevance”.’

HEFCE response

In preparing the document, we were mindful of the independence and autonomy of institutions and the limitations of what we can do. We do not wish to provide assurance where we cannot reasonably do so, thereby leading others to believe that we can accomplish things that we cannot.

Even so, we have sought to strengthen the coverage of the issues highlighted in the consultation, for example research, community engagement, international travel and the synergies between different dimensions of sustainability. It was noted that the document did not include reference to the challenges of internationalisation and this has been included. More specific responses relating to each of the actions are provided in Table 2. (The actions are summarised in Annex B of the consultation document.)

Table 2: Actions and responses for Question 4

	Action	Responses	HEFCE response
1	Our 2005 vision was that within the next 10 years, the sector would be recognised as a major contributor to society’s efforts to achieve sustainability. We will assess how far this has been realised and what further opportunities remain.	There were few comments in relation to this action. One respondent hoped that <i>‘there will be another comprehensive benchmarking of the sector’</i> . An institution pointed out the difficulty of defining ‘sustainability’ in this context, and asked whether it was <i>‘HEFCE’s role to disseminate this work, or the responsibility of each separate university?’</i>	In view of the modest number of positive comments, the cost and complexity of assessing progress and the uncertain benefits, we do not propose to proceed with this action. The strong consensus is that there is much further to go, and we believe that moving forward is more important than attempting to measure how far we have come. The purpose of this consultation was to assess further opportunities, and we believe it has successfully done so. To recognise the importance of communication, we have added an additional action to publish a progress report on the actions in 2017.
2	We will introduce sustainability into the terms of reference for all HEFCE’s strategic committees.	This was widely welcomed. One institution suggested that this should be extended to <i>‘ensure that sustainability becomes a central point of consideration’</i> , and others suggested that the composition of committees should be reviewed to ensure appropriate membership for the remit.	Further consideration of this will be included within a more general review of HEFCE’s governance arrangements and sub-committee structure, rather than as a separate action.

	Students and society		
3	We will support the National Union of Students with the Student Green Fund and will seek other opportunities for collaboration.	This was welcomed, but some pointed out the limitations of only engaging through NUS given that some higher education institutions (HEIs) work directly with students. One suggested that a different approach would be needed for institutions with small student bodies.	We will be mindful of the different ways of engaging with students and of the needs of small institutions, while recognising the role of NUS as an effective and positive force for change. On reflection, we feel that actions are not needed to signal the continuation of existing work and that our willingness to engage with other organisations is implicit.
4	We will continue to support sustainability projects through the Catalyst Fund.	No comments related specifically to this action, but there was general support for HEFCE's role in building and sharing good practice within the sector as well as beyond: <i>'HEFCE is uniquely well placed to play a connecting and collaboration building role.'</i> <i>'The issue then is the availability of funding for activity that will lead to improvement and help to realise the vision, not least in relation to HEIs' own business management and student activity.'</i>	We will proceed with this action, with some minor drafting changes.

5	The forthcoming review of the National Student Survey (NSS) will consider the potential for including one or more questions about sustainable development.	<p>This was widely welcomed: <i>'the potential inclusion of sustainability questions in the NSS could act as a significant driver for continued improvement'</i>. A number of respondents considered that the action should be firmer. However, one said that:</p> <p><i>'It would not be appropriate to include questions about sustainable development in the NSS, as the purpose of the NSS is to provide effective, meaningful and broadly comparable information to prospective students about the academic experiences of current students. Drifting away from this overall mission by providing information that does not focus on academic issues and experiences would, therefore, dilute the primary purpose.'</i></p>	The results of the consultation have been passed to the NSS review team so that they can consider including one or more questions about sustainable development in the optional question bank. Accordingly this action has been deleted.
	Education for sustainability		
6	We will continue to support the work of the Higher Education Academy (HEA) and others who can contribute to education for sustainability.	<p>There was extensive comment about the importance of ESD, and many felt that the actions in this priority area should be stronger.</p> <p>The success of the HEA's Green Academy programme was noted. Some felt that the HEA should play a stronger role, but others doubted</p>	While we must be clear that curriculum content is not a matter for HEFCE involvement, we can support innovation and good practice where there are issues of broad interest or importance. Education for sustainability is such an

		<p>the organisation's commitment to ESD.</p> <p>A number suggested that HEFCE's approach in this area:</p> <p><i>'needs to be less sensitive to the need to respect the autonomy and academic freedom of HEIs [...] and be more prescriptive.'</i></p> <p>However, others were clear that:</p> <p><i>'Institutions' curricula should not be determined by external bodies, but by academics supported by broad frameworks.'</i></p> <p>The view that HEFCE should continue to support the HEA and the Quality Assurance Agency for Higher Education in this area was nonetheless widely expressed.</p> <p>Other points made were:</p> <ul style="list-style-type: none"> • the need for research into the environmental benefits of online teaching • a question about the expertise and capability of academics to realise the required change • the value of subject guides 	<p>area.</p> <p>We have reviewed our grant letter to the HEA in the light of the consultation, and will follow up progress more actively in the context of an outcomes-based grant letter.</p> <p>The framework narrative now includes details of an award winning project at the University of Gloucestershire and a case study from the University of Nottingham.</p> <p>A reference to encouraging the HEA's work in this important area is now included in the narrative, rather than as a specific action.</p>
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		<ul style="list-style-type: none"> • the potential for collaboration between the HEA and the Society for the Environment • a concern that learning about the circular economy³ and well-being should be supported • the suggestion that ESD needed to be broadened beyond traditional 'environmental' subject areas • a wish that the framework could state the importance of the area more clearly • the tension between ESD, which requires inter- and trans-disciplinary treatment, and universities as discipline-based bodies. 	
	Research and knowledge exchange		
7	We will publish the results of the Research Excellence Framework (REF) in December 2014, and the submissions made by institutions including the impact case studies in early 2015.	This was considered an important area, for some ranking alongside or even above ESD. It was considered that the action was not fit for the importance and scope of the area, and there were a wide range of interesting suggestions and comments about extending	We have reviewed our proposals, and introduced an additional action building on the suggestions included in the responses. We will be publishing nearly 7,000 high-level case studies so that others will be

³ For further information about the circular economy see www.ellenmacarthurfoundation.org/circular-economy/circular-economy

		<p>actions in this area, including:</p> <ul style="list-style-type: none"> • a specific REF panel for ESD • a quantification of how many REF case studies were related to sustainability • consideration of aligning research with global challenges in the next REF • concerns about the recognition of interdisciplinary research in the REF • an action to investigate ways to support more interdisciplinary research and research leading towards a more sustainable future • a national report to pull out key lessons on SD from the impact case studies • an independent analysis exploring how research on sustainability has been valued in the REF • recognition that research comes with a 'carbon price', and the need to include this in research grants. • an exploration of the Research Councils' responsibility for delivering research in the most sustainable way, and whether and how research that supports 	<p>able to use them in research.</p> <p>The existing action has a minor drafting change and the additional action is as follows:</p> <p>'In evaluating the REF, we will analyse whether or not multi-and inter-disciplinary research was treated appropriately, and whether there is evidence that the REF inhibited or incentivised this kind of research. The impact case studies and our analysis of them will be a high-level resource available to researchers.'</p> <p>Sustainable development will be considered as part of the high-level analysis of the impact case studies.</p>
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		<p>sustainability is prioritised.</p> <p>A student union response commented on the important role of research and academics in informing public policy.</p>	
	A modern sustainable economy		
8	<p>We will make the case for further investment and identify opportunities where our funding can contribute to the development of a modern sustainable economy.</p>	<p>Respondents agreed with the potential of the green economy, and suggested that more prominence should be given to the role of universities and research solutions in supporting a modern sustainable society. Examples given were energy efficiency, nuclear power, renewable energy, transport, electrical networks, carbon capture, fuel cells, economics, and policy development.</p> <p>One respondent suggested that this section was overly optimistic, and noted that universities are equally well placed to contribute to the brown economy.</p> <p>Individual respondents:</p> <ul style="list-style-type: none"> • suggested that HEFCE should engage with the local enterprise partnership network • noted the importance of land-based industries. 	<p>We have replaced this action with a more specific action which we believe is more helpful: 'HEFCE will support HEIs in their engagement with local enterprise partnerships and in applying for European Structural and Investment Fund funding.'</p>

9	We will discuss with the National Centre for Universities and Business how sustainability should best be incorporated in its future work.	There was support for this action, although some felt that it lacked impact.	Discussions with the centre are ongoing, and a new Smart Specialisation Advisory Hub is in existence, so this is instead referenced in the text.
	University management		
10	We will support the Leadership Foundation for Higher Education in its goal to embed sustainability in its programmes and activities, and engage with the Committee of University Chairs to promote sustainable development as a central principle in governance.	Work in this area was welcomed, and a number of respondents felt that greater emphasis on leadership was required. HEFCE was encouraged to engage with senior leaders through the groups and events that it attends, and with Universities UK.	Our willingness to engage with other organisations is implicit in the document. To keep the framework focused we have therefore deleted this action.
11	We will commission research on progress in meeting sector carbon targets. This will involve reviewing institutional targets to ascertain whether they are progressing sufficiently to meet the sector target of a 43 per cent reduction in carbon emissions by 2020 against a 2005 baseline.	This work was welcomed and a number of interesting points were made relating to this, including: <ul style="list-style-type: none"> • that targets should reflect growth and changes in the sector and institutions • that targets should recognise the challenge of expansion (particularly for research), and should relate to student or staff numbers, floor space or output measures • the moral dimension that in many cases the world's poorest people, who have contributed least to climate change, will 	The points are helpful and illustrate the need for careful consideration about how carbon targets are created and monitored. This action is confirmed and additionally we have added a further action: 'We will explore the feasibility of establishing a Carbon Information Service, to provide support including for measuring and reporting carbon emissions, interpreting government policy such as the accounting treatment of renewables projects, and the feasibility

		<p>be most affected by it</p> <ul style="list-style-type: none"> • the scope for significant financial savings – higher education contains more cost-effective saving potential than any part of the public sector • the need to give thought to penalties and incentives • a need to align carbon reporting (including baseline setting, emissions factors and metrics) with other mandatory reporting including the UK government Carbon Reduction Commitment, to reduce complexity and give a more streamlined picture of the institution's and sector's emissions • a need for care to ensure that targets do not simply lead to divestment of activities, for example transferring halls to third parties • a need for investment • a need for clarity about Scope 3 targets • a need to monitor progress against individual targets. <p>One institution questioned the value of this</p>	<p>of Scope 3 reduction targets. We envisage that this will include advice to institutions.'</p>
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		work, if we already know that university targets indicate a shortfall in carbon reduction.	
12	We will make the case for additional investment in cost saving and carbon reduction through the Revolving Green Fund (RGF).	Continued investment through the RGF was welcomed and considered necessary for carbon reduction. One response described RGF as a ' <i>prominent example of a very successful intervention</i> '. Some responses sought: <ul style="list-style-type: none"> • greater levels of funding • longer payback periods • longer timescales for larger projects • the inclusion of water-saving projects • the expansion of the remit to include action on culture change. 	We have amended this action to reflect the establishment of RGF4, which will provide £34 million of funding for projects ⁴ . RGF4 incorporates many of the comments received, including all of those on the left apart from 'action on culture change'. While this will not be funded under RGF4, we have asked institutions to consider how culture change can be created through RGF projects.
13	We will link capital funding to sustainability, either through an over-arching Capital Investment Framework process or through the terms of individual schemes.	This was generally welcomed. While some saw this as an example of HEFCE's successful intervention, with an opportunity to effect real change, others felt that capital funding would not be sufficient to drive the necessary change. Among the other points made were that: <ul style="list-style-type: none"> • academic objectives should not be 	We will take forward this action with a minor drafting adaptation. The section now includes reference to the additional provisions introduced into the UK Research Partnership Investment Fund, which explore and incorporate in the selection process the environmental and social benefits and detriments

⁴ See www.hefce.ac.uk/whatwedo/lgm/sd/rgf/

		<p>inhibited</p> <ul style="list-style-type: none"> • HEFCE should investigate mechanisms of funding which address sustainability based on innovative assessment which would be broader than traditional 'payback'. 	accruing from potential projects.
14	We will seek to identify a better method of estimating the carbon emissions arising from the procurement of goods and services.	<p>Some welcomed this, pointing to '<i>fundamental flaws</i>' in the existing system. Others urged caution because of the complexity of the area. Suggestions were made that the publicly available 2050 specification for the assessment of the life cycle greenhouse gas emissions of goods and services might be of assistance, and that the sector might learn from practice in the NHS.</p> <p>One response suggested that progress on procurement should not be limited to carbon.</p>	The points raised illustrate the difficulties of measuring carbon emissions from procurement, and the need for careful consideration about how carbon targets are created and monitored. The action will proceed with a minor drafting change, and may come within the scope of the Carbon Information Service detailed above.
15	We will work with sector bodies including Universities UK and GuildHE where we are able to support progress in areas such as procurement and information and communications technology.	<p>Responses referred to HEFCE's '<i>vital role in ensuring that engagement with issues of sustainable development is co-ordinated across sector bodies</i>'. HEFCE's capacity-building role was recognised, with the S-Labs project cited as a worthwhile example.</p> <p>Other responses noted that:</p>	Our willingness to engage with other organisations is implicit. This action has been redrafted to focus on procurement.

		<ul style="list-style-type: none"> • university pension funds are invested in the fossil fuel industry • local procurement is important • information technology has environmental benefits, such as reducing paper usage and business travel • procurement can drive innovation in supply chains. 	
	Information and analysis		
16	We will support the provision of information and analysis so that institutions can follow a broadly consistent approach which takes account of good practice and developing national policy.	<p>Respondents suggested that:</p> <ul style="list-style-type: none"> • support for the Green Gown Awards was helpful • Estate Management Record data have grown substantially and should be useful • HEFCE could require universities to be accredited to an environmental management system • this action was unclear. 	<p>This action has been superseded by the new action detailed above relating to a Carbon Information Service.</p> <p>We have confirmed our continued support for the Green Gown Awards.</p>
17	We will develop a model to predict the carbon emissions of each institution so that they can benchmark performance.	One institution with expertise in this area welcomed the proposal. However, others urged caution and noted that benchmarks should take institutional and subject-specific differences into account. One institution	Having reflected on the responses, we have decided not to proceed with this work at the present time.

		<p>described the proposal as costly, narrow and difficult, and suggested that a set of broad sector-level sustainability indicators would be more helpful. Another institution used student housing to illustrate the difficulties:</p> <p><i>'A university which builds new halls of residence will show an increase in energy use, whereas one that outsources halls to a private provider would show a decrease. A university which does not match the growth in student numbers with more hall places is effectively increasing energy use in more energy-inefficient houses in multiple occupancy.'</i></p>	
18	The introduction of sustainability indicators will be considered following the fundamental review of performance indicators.	This was welcomed by some. However, others pointed to the administrative burden of monitoring and reporting, the vital importance of providing appropriate guidance and context, supporting fair comparison, and avoiding perverse incentives or behaviour.	The framework has been changed to refer to the work of the UK Performance Indicator Steering Group, rather than including this as a specific action.
	HEFCE operations		
19	We will continue to improve HEFCE's own corporate social responsibility performance and report publicly on progress each year.	<p>There were very few comments about HEFCE's own operations, but one respondent said:</p> <p><i>'In many ways this is exemplary, and</i></p>	We will proceed with this action, deleting the reference to public reporting because this is a requirement in any case. We will reflect on our approach and how we can

		<p><i>sector leading, and it is a great pity that other organisations do not express similar levels of support.'</i></p> <p>The respondent added that HEFCE could seek to learn its way more deeply into sustainability, through staff training and development.</p>	<p>promote staff understanding of the issues. Opportunities may appear as Bristol prepares to become the European Green Capital in 2015.</p>
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Consultation question 5

Do you have any suggestions for improving the Revolving Green Fund?

21. The consultation responses support the continuation of the Revolving Green Fund with increased funding levels in further rounds. Suggestions for improvement include:

- extending the project timescales, the payback period allowed on projects, and the loan repayment period
- increasing the scope of fundable projects to include Scope 3 carbon emissions and water management
- providing case study feedback to the sector to share HEIs' experience of the fund.

22. Respondents felt that the RGF was '*a prominent example of a very successful intervention*', but requested '*less restricted timescales*'.

HEFCE response

These suggestions are consistent with the findings of the evaluation carried out by Blue Alumni, and we have taken them into account in designing RGF4 which is being provided jointly with Salix Finance. Many of the requirements have been changed to make it more flexible, and at £34 million it will be the largest round of the RGF.

Consultation question 6

Are the key themes we have identified the right ones? Are there other themes or areas of work that HEFCE should be prioritising?

Are the key themes we have identified the right ones?

Broadly appropriate	Not appropriate	No clear steer	No answer
30	0	31	3

23. Many respondents noted the importance of implementation and the inter-relationships between the themes. Some suggested a re-organisation or re-prioritisation of the themes, but there was no clear consensus on what the resultant themes would be.

Should HEFCE be prioritising other themes or areas of work?

24. The draft framework suggested seven themes. A total of 31 respondents commented directly on specific themes, and a summary of comments against each theme is provided in Table 3.

Table 3: Comments against themes for question 6

1. Supporting students	<p>This theme was broadly supported and the partnership with NUS was welcomed.</p> <p>It was suggested that the theme be extended to include support for staff.</p>
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<p>2. Education for sustainable development</p>	<p>This theme was considered to be the key to HEIs' biggest contribution to society's efforts to achieve sustainability. Suggestions for improvement therefore centred around prioritising this theme.</p> <p><i>'It is of fundamental importance that students graduate with skills, knowledge and attitudes that will support a more sustainable future. Whilst this is included as a theme it is given insufficient priority.'</i></p>
<p>3. Research and knowledge exchange</p>	<p>Respondents welcomed the enhancements made to the Research Excellence Framework.</p> <p>Suggestions for improvement included ensuring that both the Sustainable Development Framework and future REFs encouraged vital interdisciplinary work and collaborative partnerships.</p> <p>It was suggested that HEFCE could do more to facilitate collaborative work. It could also actively encourage the transfer of best practice and new technologies between HEIs and external organisations, perhaps through benchmarking.</p>
<p>4. Modern sustainable economy</p>	<p>Respondents suggested that this theme was linked so closely with other themes (such as academic curriculum and research agendas) that it did not merit a separate theme.</p>
<p>5. University management and business operations</p>	<p>This theme elicited responses about the need to emphasise the role of leadership, governance and an effective communications strategy in driving change. It was suggested that the theme make explicit mention of information and communications technology in addition to estates.</p> <p>The British Standards Institution's standard PAS 2050:2011 was referenced as a source of codified best practice, and there was a request for support and guidance for institutions dealing with expansion and 24/7 operations.</p>
<p>6. Information and analysis</p>	<p>There were few specific comments. One suggested that information and analysis were common to the other themes. The need for comparable benchmarking data, normalised against international standards and taking into account the diversity of the sector, was noted. So was the need for data to encompass all three pillars of sustainability: economic, social and environmental.</p>
<p>7. HEFCE operations and commitment</p>	<p>Respondents suggested that this be renamed 'HEFCE policy and practice'.</p> <p><i>'HEFCE is uniquely well placed to play a connecting and collaboration building role across government departments, students, [non-governmental organisations] and the business sector to ensure young people are sufficiently prepared for the opportunities and challenges of a green and fair</i></p>

	<p><i>economy. Similarly HEFCE could lead on better coordination between government departments on how they can collaborate to support learning for sustainable development. HEFCE has a potentially powerful role to play and we encourage it to be more ambitious.'</i></p>
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25. Six key themes emerged from the suggestions for other themes or areas of work that HEFCE should prioritise.

a. **Culture:** Culture change is required, so the framework should include a focus on the actions required at an individual and collective level to influence personal and social norms.

'Culture is what holds the other three "C"s together (Campus, Curriculum and Community).'

b. **Community:** HEIs are part of their local communities economically, socially and environmentally, and respondents suggest that the framework should include a greater emphasis on the need to engage with, play a leadership role in and work in partnership with the wider community to add value at a civic level.

c. **Partnership:** Respondents saw HEFCE's role as promoting more collaborative working, and wanted more information on how carbon would be counted in collaborative projects.

'Throughout, I missed more specific links to partners and other agencies/organisations with parallel interests in SD in [higher education], although it was good to see reference to NUS; but how will HEFCE develop a collaborative partnership approach to SD?'

'The ability of HEFCE (together with the other national funding councils) to facilitate [these types of] collaborative efforts is key to driving them forward and obtaining positive outcomes.'

'The S-Lab project has been valuable in sharing experience and providing guidance and has engaged lab managers in several of our large scientific departments.'

d. **Procurement:** This was a popular theme, with many calls for local and ethical procurement to be considered under the SD banner. It was noted that the HEFCE corporate social responsibility policy 2011-15 set out a rounded description of how to promote sustainable development through procurement practices which could be incorporated into the framework.

'Policies abound to ensure coffee purchased from Columbia is Fair Trade and timber procured from Indonesia is [Forest Stewardship Council] certified but how many institutions ensure that those from the local community providing unskilled support labour are paid a living wage and given realistic terms of employment or that the firms supplying them have effective practices on up-skilling or supporting training and development?'

e. **Leadership:** Leadership was a common suggestion for an additional theme. The role of leaders in driving sustainability was seen as essential to success and to an infrastructure resourced appropriately to support sustainability.

'A piecemeal approach is likely to result in piecemeal outcomes [...] Transformational development is a long term issue and at the very least, senior teams need to be supported by operational and tactical leaders to drive and enact change. The document needs to recognise that whole institutional development is key for whole institutional change.'

f. **Information technology:** Respondents suggested that the framework address sustainable information technology, particularly with regard to high-performance computing, electricity consumption and the use of cloud and external hosting.

Additional comments

26. Respondents made additional comments that did not refer directly to the themes in Question 6. The issues raised are summarised below.

a. **Definition of sustainability:** It was suggested that HEFCE's definition could be broader and more nuanced to include societal and community impact, economic factors, issues (such as space utilisation) which have large cost and environmental impact, and issues more immediate than climate change such as biodiversity loss and ecosystem function. The NHS sustainable development unit was suggested as an example model.

b. **Ambition:** It was suggested that the framework was not ambitious enough. One respondent suggested developing a more detailed and longer-term vision for the sector to 2050, with a roadmap and details of how HEFCE could support the changes required. Another said:

'Is it time for a completely new approach in which HEFCE could show profound and inspirational leadership? A new approach in which we abandon "stand-alone sustainability" and [...] embed the principles and values of sustainability into the sector's existing policy infrastructure. Perhaps it's not so surprising that the sector struggles to embrace what it sees as an additional, separate agenda. Sustainability isn't about doing different things but doing what we do now differently.'

c. **Reporting:** A number of respondents queried how progress would be measured, particularly if HEFCE had no mandate, funding or power to drive change.

'What will HEFCE do if sector doesn't achieve the 43 per cent target?'

27. Others commented on the method and power of reporting SD progress. For example:

a. ISO 14001, BS 8900 and ISO 20121 could be useful standards for universities to measure progress.

- b. One respondent suggested that greenhouse gas reporting is switched to the global accounting Greenhouse Gas Protocol methodology, to facilitate off-site renewables.
- c. Scope 3 requirements were described as a 'big burden for poor data'. Scope 1 reporting was presented as an area over which HEIs have more control but which is omitted from the framework.
- d. It was suggested that flexible reporting approaches such as the Global Reporting Initiative be used to allow HEIs the freedom to decide what is most important to them.
- e. The Learning in Future Environments Index was suggested as a measure of whole-institution accountability and improvement which would soon be released in a radical new format, free to most of the sector.
- f. The People and Planet Green League was described as varying its assessment requirements each year, and therefore perceived as unhelpful.
- g. It was suggested that HEFCE could set qualitative targets where data are not yet available or robust, or else use existing data to set benchmarks, for example around new buildings and refurbishments.

28. **Stakeholders:** The role of the media was noted by one respondent.

'One important entity which is currently missing from this group of stakeholders is the media. The media have an enormous and under-appreciated influence over society and public policy making. In that regard, the importance of constructive academic engagement with the media ought to be supported.'

HEFCE response

We have considered these points in re-drafting the framework, and have included references to some, for example including community engagement in a revised vision.

Having considered the comments, we have re-structured the framework into three sections entitled 'Reducing environmental impacts', 'HEFCE's support of HEIs engaging in the "green sector" of the economy' and 'HEFCE's role in engaging students'.

We have reflected on the comments about 'Leadership', and while we agree with many of the sentiments expressed we do not believe that HEFCE should have a preeminent role. The drive for progress is now clearly understood in the sector, and leadership needs to come from many quarters. HEFCE will seek to play its part, but raising unrealistic expectations about what HEFCE can do would be disingenuous and ultimately unhelpful. The endeavour needs to be shared if potential and progress are to be fully realised.

Many of the other points will be helpful as we proceed with the various actions.

Consultation question 7

Do you have any other comments on our approach to sustainable development?

29. We have grouped comments into the categories shown in Table 4.

Table 4: Responses to Question 7 by category

	Number of respondents	Comment
A	9	The framework needs to include a broader focus on ethics and on corporate and social responsibility. Concerted effort is needed to demonstrate how the work of the sector is crucial to a sustainable future.
B	7	There should be a focus on students, specifically educating them to be more sustainable in their lifestyles, and using the NSS to gather students' views on SD.
C	7	HEFCE should act as a broker and leader to promote an approach to Scope 3 emissions and carbon reporting methodologies.
D	5	Whole-institution approaches to sustainable development should be promoted across teaching, research, knowledge exchange and all disciplines: <i>'not just an estates issue and the case studies should reflect this.'</i>
E	5	There should be an aspirational SD framework that engages the hearts and minds of all, and particularly senior management.
F	4	There is a tension between growth and sustainability: <i>'a conundrum at the heart of this (and indeed all sustainable development) [...] how do you deal with genuine new growth and expansion'?</i>
G	4	HEIs have a unique role to play in implanting sustainability throughout the curriculum, ensuring students take the learning into their working lives.
H	3	The profile of sustainable development should be enhanced within the REF, because it is a key driver of institutional behaviour.

30. The following specific responses were received.

'HEFCE to consider ways in which "alternative providers" can be supported to engage with sustainable development/education for sustainable development including through access to funds and grants for this purpose. There needs to be a level playing field for all higher education providers so students and staff at "alternative providers" can engage with the debates and take part in sector-wide initiatives that support sustainable development. We urge HEFCE to use the Framework to set out clearly the ways in which it will work with the private [higher education] sector on sustainable development.'

'Need to make sure that the approach to sustainability is understood for each area of HEFCE's influence and is embedded into every aspect of this influence to ensure long-term resilience for the sector.'

'HEFCE have had a positive impact on sustainability in the sector it is just that there is more that could be done by utilising some of the expertise in the sector and those outside who would help HEFCE further develop the opportunities their influence provides.'

'Enlarging the community of practice – enabling participation, building linkages and partnerships, acknowledging achievements and difficulties continue to be our priority as citizens of the world.'

'[T]here should be a mechanism in place to facilitate UK-based organisations to systematically exchange ideas and get updated on international developments.'

'HEFCE has taken a relatively effective, if light-touch approach, which we believe has worked well to date, but the challenging goals of carbon reduction will only be met by an increased focus on the analysis and accountability. [...] HEFCE, along with other agencies, must seek to approach this agenda in an integrated and co-ordinated manner. Where possible, working to agreed shared objectives and methodologies in line with both international and national strategies, plans and targets.'

HEFCE response

We have considered these points in the re-drafting of the framework and have taken a number of them into account, for example the synergies arising from the broad advancement of sustainability and the challenges arising from internationalisation. Many of the other points will be helpful in advancing discussion in the sector and as we proceed with the various actions.

Annex A: Report on the consultation events

1. Two consultation events took place, in addition to the formal HEFCE consultation.
2. The first event was held at the Queens Hotel, City Square, Leeds on Thursday 9 January 2014 and approximately 60 delegates attended. The second event was held at Mary Ward House, Tavistock Place, London on Thursday 30 January 2014 and approximately 125 delegates attended.
3. The London event was available as a webcast that attracted about 60 registered participants. The presentations from both events and the proceedings from London are available at www.hefce.ac.uk/news/events/2014/events83604.html
4. The objectives for the events were to promote discussion, seek comments from staff at all levels within institutions, and seek students' views to help shape future actions. We wanted to gather information on what works in terms of sustainable development (SD) activity in universities, and how this can best inform HEFCE's and the higher education sector's activity. The events were the first HEFCE consultation events where students were specifically invited, and the first time we have used a webcast.
5. Both events were introduced by HEFCE's Deputy Chief Executive, Steve Egan, and facilitated by Alison Johns, the then Head of Leadership, Governance and Management and Organisational Development. Three key speakers at each event contributed to a panel discussion as part of the consultation.
6. At Leeds the key speakers were:
 - Dame Julia King (Vice-Chancellor, Aston University and Committee on Climate Change)
 - Professor David Hogg (Pro Vice-Chancellor, Research and Innovation, University of Leeds)
 - Dom Anderson (Vice-President, Society and Citizenship, National Union of Students)
7. In London the key speakers were:
 - David Pencheon (Director of the NHS Sustainable Development Unit)
 - Nigel Carrington (Vice-Chancellor, University of the Arts London)
 - Dom Anderson.
8. In the afternoon, participants discussed the consultation questions and attended a facilitated plenary session where they provided feedback and asked questions concerning the Sustainable Development Framework. A record of the comments and suggestions at these events was taken into consideration alongside the findings from the formal consultation.
9. Most participants felt that the framework was a good idea, but some reservations about its form and content were expressed. Some asked that the document be more strongly worded, or felt that HEFCE could have done more to seek the participation of the sector's sustainable development experts when formulating it.

10. It was suggested that the framework should be more holistic in terms of sustainable development, and include more social and community emphasis. There was a view that carbon reduction has had undue prominence, and a strongly held view that sections on leadership and community engagement should be included.

11. Despite pockets of excellences some questioned whether the sector was leading society in sustainable development; others felt that sector achievements were not widely recognised. Many of the participants considered education for sustainable development a priority, and saw it as lagging behind other aspects of SD. Some found it hard to say what the sector had achieved since 2005 because there had not been an evaluation.

12. In discussion it was suggested that integration and engagement with SD could be improved at all levels within institutions, and also between institutions, business, industry and the wider community. Delegates suggested that the community and local benefits of SD should be given more prominence. Promotion and communication were seen as vital, and HEFCE was encouraged to ensure that the new framework was sufficiently broad in scope. There was potential for the document to be both inspirational and exciting.

13. Comments from written responses expressed differing views about the events. Two examples follow.

'The two conferences held did not introduce the framework at the start of the sessions resulting in focus being diverted from the main reason we attend[ed] to learning from best practice in the sector. This is beneficial however this did not positively contribute to addressing the framework and reviewing its suitability. Also the consultation period is extremely short, meaning the sector is not able to fully discuss the framework within the various institutions meaning the knowledge, skills and breadth of experience in the sector is once again not being utilised.'

'[T]he consultation seminar in London was very engaging and very well run.'

Annex B: List of respondents

Anglia Ruskin University
Arup Group Ltd
Association of University Administrators
Association of University Directors of Estates
Aston University
Birmingham City University
Bournemouth University
British Standards Institute
Canterbury Christ Church University
Carbon Trust
City University, London
Coventry University
De Montfort University
Environmental Association for Universities and Colleges
English Learning and Sustainability Alliance
Falmouth University
Ifs University College
Imperial College London
Institute of Cancer Research
Institute of Education
Sustainable University One-stop Shop
Keele University
King's College London
London South Bank University
Loughborough University
Manchester Metropolitan University
Middlesex University
Nottingham Trent University
The National Union of Students
The Open University
Oxford Brookes University
Plymouth University
Quality Assurance Agency for Higher Education
Queen Mary University of London
Royal Agricultural University
Sheffield Hallam University
Sheffield University Students Union
South West Learning for Sustainability Coalition
Southampton Solent University
University Campus Suffolk
University and College Union
University College London Union
University of Bath
University of Bedfordshire
University of Birmingham
University of Brighton
University of Bristol
University of Cambridge
University of Central Lancashire
University of Durham
University of Edinburgh
University of Gloucestershire
University of Greenwich
University of Hertfordshire
University of Leeds
University of Lincoln
University of Manchester
University of Nottingham
University of Oxford
University of Portsmouth
University of Sheffield

University of Southampton
University of Southampton students
University of Sunderland
University of Sussex
University of the West of England,
Bristol

University of Worcester
An individual at the University of St
Andrews
York St John University

Annex C: Summary of HEFCE actions showing changes since the consultation

Action	Change	Comment
Our 2005 vision was that within the next 10 years, the sector would be recognised as a major contributor to society's efforts to achieve sustainability. We will assess how far this has been realised and what further opportunities remain.	Deleted	Support for this was limited and such an assessment would be difficult and expensive.
We will publish a progress report on the actions in 2017.	New	This recognises the importance of transparency and communication.
We will introduce sustainability into the terms of reference for all HEFCE's strategic advisory committees.	Deleted	This will be included as part of a more general review of HEFCE's governance arrangements and sub-committee structure.
We will support the National Union of Students with the Students' Green Fund and will seek other opportunities for collaboration.	Deleted	We do not feel that actions are needed to signal the continuation of existing work.
We will continue to support sustainability projects through the Catalyst Fund.	Minor drafting adaptation	
The forthcoming review of the National Student Survey will consider the potential for including one or more questions about sustainable development.	Deleted	We have already passed the results of the consultation to the National Student Survey review team.
We will continue to support the work of the Higher Education Academy and others who can contribute to education for sustainable development.	Adapted	Support for the Academy's work in this area is now referenced in the narrative of the report.

Action	Change	Comment
We will publish the results of the Research Excellence Framework (REF) in December 2014, and the submissions made by institutions including the impact case studies in early 2015.	Minor drafting adaptation	
The REF impact case studies and our analysis of them will be a high-level resource available to researchers.	New	This action is now contained in the text.
In evaluating the REF, we will analyse whether multi-disciplinary research was treated more appropriately than in the 2008 Research Assessment Exercise, and whether there is evidence that the REF inhibited or incentivised multi-disciplinary research.	New	
We will make the case for further investment and identify opportunities where our funding can contribute to the development of a modern sustainable economy.	Deleted	The action in relation to local enterprise partnerships is more specific and helpful.
HEFCE will support higher education institutions in their engagement with Local Enterprise Partnerships and in applying for European Structural and Investment Fund funding.	New	
We will discuss with the National Centre for Universities and Business how sustainability should best be incorporated in its work.	Adapted	Discussions with the centre are ongoing and the Advisory Hub operating, so this is instead referenced in the text.
We will support the Leadership Foundation for Higher Education in its goal to embed sustainability in its programmes and activities.	Deleted	Our willingness to engage with other organisations is implicit.
We will engage with the Committee of University Chairs to promote sustainable development as a central principle in governance.	Deleted	Our willingness to engage with other organisations is implicit.

Action	Change	Comment
We will commission research on progress in meeting sector carbon targets. This will involve reviewing institutional targets, to ascertain whether they are progressing sufficiently to meet the sector target of a 43 per cent reduction in carbon emissions by 2020 against a 2005 baseline.	Agreed	
We will deliver a fourth round of the Revolving Green Fund (RGF) and make the case for additional investment in cost saving and carbon reduction through the RGF.	Agreed	
We will maintain the link between capital funding and sustainability, either through an over-arching Capital Investment Fund process or through the terms of individual schemes.	Minor drafting adaptation	
We will seek to identify a better method of estimating the carbon emissions arising from the procurement of goods and services.	Minor drafting adaptation	
We will work with sector bodies including Universities UK and GuildHE where we are able to support progress in areas such as procurement and information and communications technology.	Drafting adaptation and move to the narrative	Our willingness to engage with other organisations is implicit.
We will continue to support dissemination from the annual Green Gown Awards.	New	To review following receipt of the 2014 grant letter.
We will review our 2010 guidance on producing carbon management plans.	New	
We will support the provision of information and good practice, where gaps need to be filled and our involvement can add value.	Deleted	Replaced with a more specific action relating to a Carbon Information Service (see below).
We will develop a model to predict the carbon emissions of each institution so that they can benchmark performance.	Deleted	We believe there are higher priorities for the time being.

Action	Change	Comment
We will explore the feasibility of establishing a Carbon Information Service to provide support including for the measuring and reporting of carbon emissions, interpreting government policy such as the accounting treatment of renewables projects, and the feasibility of Scope 3 reduction targets. We envisage that this will include advice to institutions.	New	
The introduction of sustainability indicators will be considered in due course by the UK Performance Indicators Steering Group.	Minor drafting adaptation	
We will continue to improve HEFCE's own corporate social responsibility performance, and report publicly on progress each year.	Minor drafting adaptation	