

Learning Brief

SSN Members' Event

Preparing for Public Sector Climate Change Reporting

Tuesday, 31st March 2015

Royal College of Physicians, Edinburgh

1. Introduction

1.1 About the Event:

Around 60 members of the Sustainable Scotland Network (SSN) gathered from across the public sector for an event focussing on preparing for the introduction of required public sector climate change reporting on the 31st of March 2015. The event brought together 27 Local Authorities, 10 Non-Departmental Public Bodies (NDPBs), 2 NHS representatives, 2 High & Further Education Institutions, and other representatives from the public sector, including the Scottish Government (SGvt). The event aimed to:

- provide background information on the process that has led to the introduction of Required Reporting;
- allow SSN Members to contribute to SSN's consultation response; and
- to identify support needed to successfully complete the new climate change report templates.

1.2 Background:

The Scottish Government has initiated a consultation on arrangements for required climate change reporting by public bodies, with a deadline for responding of 29th May. The new reporting Order is being made under the remit of the Climate Change (Scotland) Act with the aim of encouraging "continuous improvement and to enable more accurate and consistent information to be collected". The new arrangements build on the voluntary reporting undertaken by many public sector organisations, as part of their commitment to Scotland's Climate Change Declaration, the Universities & Colleges Climate Commitment for Scotland, and Public Sector Sustainability Reporting. Over recent months, the Climate Leaders Officers Group (CLOG) has been collaboratively developing the draft reporting template and associated guidance which will underpin the new required reporting. Additionally, CLOG is keen to promote wider recommended reporting as good practice for public sector bodies.

The SSN Members' Event was organised to address the following aims and objectives:

Aims:

- To provide background information on the process that has led to Required Reporting
- To identify support and capacity-building needs to enhance the new reporting process.

- To increase SSN Members' understanding of the new reporting process and the support being made available.

Objectives:

- To allow Sustainable Scotland Network members to contribute to the network's consultation response.
- To identify key support mechanisms for successfully completing climate change reports.
- To provide a forum where more SSN members with different levels of experience in reporting can discuss experiences.

1.3 This Learning Brief:

This Learning Brief aims to collate information from the event; reinforce learning; and act as a learning resource for members and colleagues of members who weren't able to attend. The organisation of the brief mirrors the event agenda:

1. Reporting Template
2. Guidance and Consultation
3. Getting Ready for Reporting, to reflect the sections of the day.

Further information, including key reference points and additional learning opportunities, can be found at the end of the document.

2. Reporting Template, Guidance and Consultation

2.1 Welcome from Rebecca Bell, SSN Chair:

Rebecca Bell opened the day by talking about the background to the current changes and developments underway. She highlighted that it was originally SSN Members in local authorities that called for the implementation of required reporting as a response to the Climate Change Act, and outlined that the Public Sector Climate Leaders Forum (PSLCF) and the CLOG have been working on this extensively for a significant amount of time, stressing that mandatory reporting "hasn't come out of nowhere".

2.2 Development of the Reporting Template and Guidance:

2.2a Climate Change Public Bodies Duties: Required Reporting – Howard Steele, Scottish Government

Howard Steele spoke in detail on the process of the development of Required Reporting, some of the key points include:

- We can choose to see Required Reporting as a burden or an opportunity, but either way "We're all in this together" – The Scottish Government has to do this as well rather than simply enforcing the system on the public sector.

- Why do we need this? Because we need to ramp up; because we are spending public money and that comes with certain expectations and responsibilities; because the Minister for Environment, Climate Change and Land Reform is expecting the public sector to lead the way; because although we have a good track record, there is much work to be done, and progress is not happening fast enough; and most importantly, **because we have to be able to report annually on progress and action so that the government can then come to focus resource and support on what needs to be done.**
- There was and is a logic behind reporting and bringing in the legislation to make it mandatory.

The new reporting form has developed through the following process:

- The CLOG working group on reporting was formed and held two workshops in late 2014 with the reporting form agreed in December 2014 taking account of. These workshops resulted in the submissions of over 200 comments on what should and shouldn't be in the template. The new template used the Scotland's Climate Change Declaration (SCCD) template as a starting place with an "inclusive and open approach to narrow down to the essentials".
- The 'Major Players' list was updated in January 2015 (the 150 public bodies as described by the Freedom of Information (Scotland) Act). Only those restricted to FOISA regulations would be asked.
- The Statutory Order opened to consultation in February 2015.

The new reporting arrangements will feature both Required and Recommended Reporting sections for the following reasons:

- Anything that isn't included in the order couldn't be added at a later date without renewing the whole process. Including Recommended Reporting allows for future development of Required Reporting requirements without prompting a whole new legislative process.
- The section provides an opportunity for advanced players to continue to report additional information unique to their operations, for example, area-wide emissions, behaviour change, resource efficiency, biodiversity etc. It also enables continued reporting of information previously recorded by some public bodies through other reporting mechanisms.
- It is strongly recommended that organisations fill in the recommended table (which is under development): "[we] encourage advanced players to continue reporting on other key emissions sources- the story still needs to be told and both recommended and required information will be taken in to account when we aggregate all this together for an annual report"

The consultation process is open from 20th February to the 29th of May. Views are sought on the policy proposal, the statutory order, the Major Players list, and the reporting form. After the consultation, all the responses will be taken into account, the order will be refined and taken through parliament. The Government aims to bring the reporting requirement into force in October 2015.

Parallel to the consultation process, further work will be done on the preparation of guidance and support for reporting. Reporting guidance has been developed by SSN, CLOG and the Scottish Government and aims to:

- help practitioners understand and complete their reports;
- explain the questions and the purpose of asking them;
- provide relevant advice;

- outline methodology - including links to tools and data support; and
- contain recommended information and Major Players list.

Howard Steele concluded by clarifying on a few points about the aims and intentions of the government in introducing this change:

- SCCD, UCCCFs and any other Climate Change declarations will not be undermined. Though the reporting mechanism has changed, the commitment made in these declarations still stands.
- Reports will be submitted to the Scottish Government for the first year of Required Reporting. This mechanism supersedes the current obligation. It is replacing, it is not in addition to. Reporting continues to be voluntary for the pilot trial year until the legislation comes in to force for the 16/17 reporting year.
- In order to address concerns around using correct emissions factors across the board, the current emission factors will be pre-loaded into the template, to ensure consistency across the public sector.
- The Scottish Government intends to form an IT system/structure to support collation and analysis of the information gathered through reporting.
- Both the Required and Recommended data is valued and considered by the government.
- An overall sector summary report will be produced formally that will go to the CLOG to identify strengths and weaknesses and where support and resources need to be given. At the moment there is no intention for publication, instead it should be seen as a tool to inform future strategy and legislation (and PSCLF). The purpose is “on the ground information to help develop the RPP3... [and]... collecting sector specific high level data to inform future policy and - there is no hidden agenda.”
- During the trial run for next year, starting 1st April 2015, reports will be submitted to SSN. Publication of validated reports by the reporting organisation will be encouraged, but the reports will not be published by the Scottish Government in the first year.
- There are no intentions from the SG to develop league tables. The government believes compiling a league table comparing 150 different footprints and organisational scopes would be impossible and meaningless. There is, however, potential for individual benchmarking.

2.2b Climate Change Public Bodies Duties: Required Reporting- George Tarvit, Sustainable Scotland Network

George Tarvit spoke further about the path towards Required Reporting, what existed before and how the sector has gotten here. Having been heavily involved in this process, and in the development of the first climate change reporting mechanism for the public sector in Scotland, George expressed that it was important that people heard from SSN on this topic.

On voluntary reporting... it was a great mechanism to initiate action and accountability of the public sector on climate change.

“Voluntary reporting has gotten climate change on the agenda. It got us to this point, but it needed to evolve.”

Voluntary reporting has helped to define and work towards outcomes, but it is not as robust, consistent and externally transparent as it needs to be. George explained that whether or not Required Reporting was coming into play, it was also useful (in 2015) to reflect on the reporting process and evolve/improve it to the current needs and demands. It needs to be better: data and narrative connections need to improve as do transparency and accuracy around GHG protocols.

On the development of the reporting template... A collaborative process has involved a number of practitioners who have stepped up to the plate to be active in this discussion, which has helped to ground the discussions. Both PSCLF and CLOG have done a significant amount of work to produce the current template. It is particularly important to take into account the range of public sector representatives who contributed through CLOG. The list includes national bodies (Scottish Government, COSLA), support organisations and networks (SSN, EAUC, Adaptation Scotland, RES, 2020 Climate Group), local authority professionals, and NDPBs (Scottish Water, Scottish Enterprise, SEPA, SNH, Transport Scotland, NHS, Audit Scotland, Historic Scotland, Highlands & Islands Enterprise, Scottish Parliament etc). Many of the members of CLOG working on the template are SSN Members.

“The collaborative approach to these discussions [about the required reporting template] cannot be underestimated.”

On the reporting schedule... It was recognized that it will be difficult to deliver these reports on time. Hopefully the move towards Required Reporting means that those who put together the report will be better placed as they will, hopefully, have more internal support in the process.

Ultimately, the new reporting mechanism will help to identify challenges and gaps across the sector.

Finally, the topic of Recommended Reporting was addressed. It was stressed that it’s important not to step backwards from the voluntary approach in terms of reporting content and scope. All of the Recommended Reporting is still seen to be important, that information is still valuable, and in fact some people may spend the majority of their time working in on related areas, such as behaviour change, area-wide emissions, innovation, community development, biodiversity, partnership working, health, economic development, etc.

The development the Required Reporting template was such an intense process that the Recommended Reporting requirements and supporting guidance is still ongoing. George indicated that if members would like to participate in the development process on this, that they should contact him direct over the course of early April.

2.2c Climate Change Public Bodies Duties: Required Reporting- Clare Wharmby, Carbon Forecast

Clare Wharmby discussed the development of the reporting template and gave a brief explanation of use of the new template.

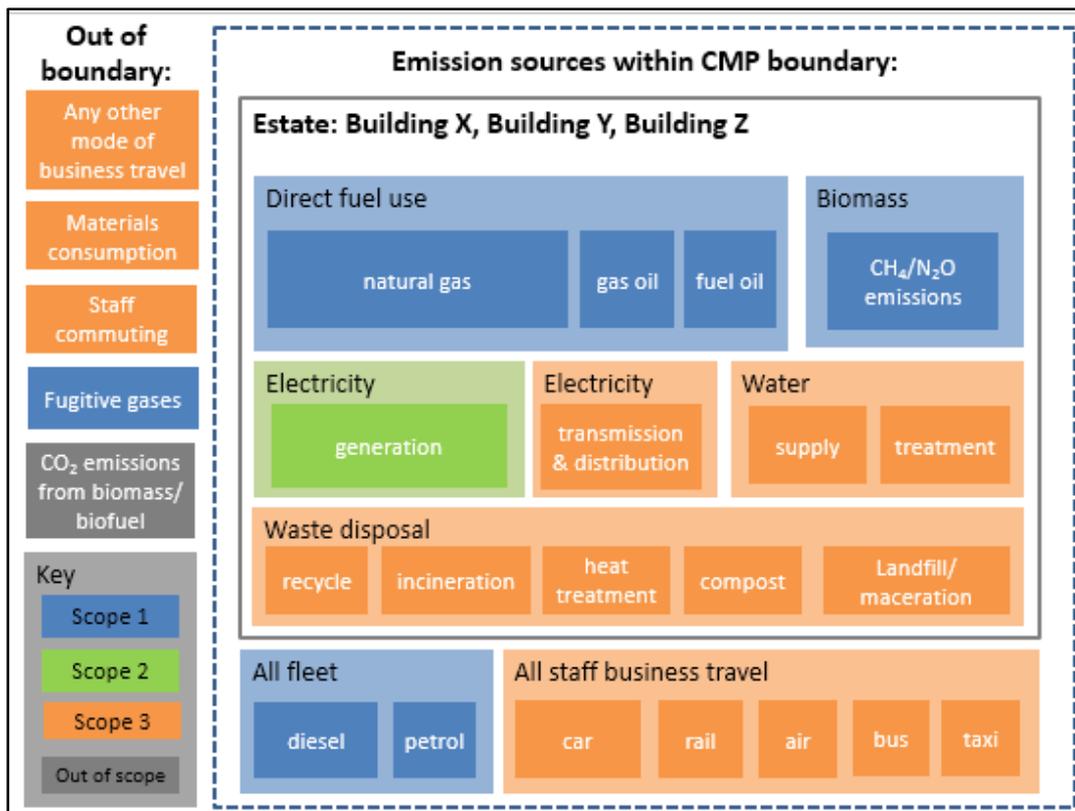
Clare explained that development of the template has taken around 4 months, starting with the SCCD reporting as a basis. Required Reporting, developed by the CLOG Working Group contains 6 sections relevant to all public sectors. Four sector specific reporting templates/processes for Recommended Reporting are being developed by sector representatives (sectors being local authorities, NDPBs, NHS

and Higher and Further Education Institutes) to help reduce double reporting and streamline overall reporting requirements.

Topics include:

- **Organisational profile:** basic questions about the organisation, such as size according to individually mandated metrics, etc.
 - Make sure to explain the metrics that you are using for your organisation.
- **Governance, Management and Strategy:** questions on how climate change is governed and managed within your organisation; where climate change strategy sits within different documents; and what the organisation will be focused on in the year ahead.
 - Organisations are encouraged to be critical as well as positive. Need to be honest about the organisation so that you can understand what governance works and what governance doesn't work.
- **Corporate Emissions:** information about emissions based on organisational boundaries, targets, and project data.
 - It was stressed in this section that organisations need to set their own boundaries and that there will be things outside of your organisation's boundary. If this is the case, this needs to be clear in the comments sections. Clare included an example of defined boundaries, see Image A.
 - It was also stressed that organisations should be consistent with their baseline years and use the one that they have set for themselves. Across the sector, baseline years often vary anywhere between 2005-2014, talk about your current baseline year.
 - Organisations will need to provide an emissions breakdown of the most recent year. To do this, emissions factors for the year are provided in the template from DEFRA/DECC.
 - Clare advised that "if you're using some sort of carbon foot-printing tool, this shouldn't be a massive job to fill in".
 - It is common for there to be a range of targets held by different teams/departments. One important component of the report is having all targets collated into one place.
 - Project data is likely to be the most difficult to calculate. The template asks for the top ten projects based on carbon savings, but often a lot of this information is projected and so is challenging to report accurately.
 - Many questions were raised in the development of this section on how to incorporate organisational renewables. It is suggested that the comment box is used to explain this. If you have unique data sets around renewables, please provide this data.

Image A:

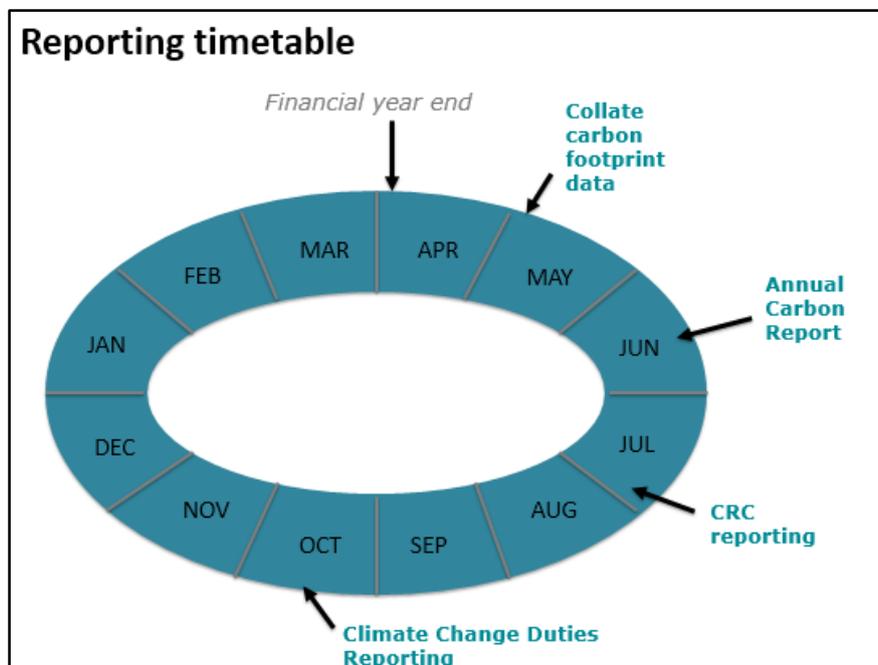


- The Adaptation section was designed by Adaptation Scotland. There is an understanding that many organisations are not very far ahead on this, many are just monitoring and assessing risks.
- The procurement section uses the flexible framework tool.
- There is still an open question around what type of validation is encouraged or necessary, whether that be internal, peer-to-peer, or external. It may be that there is a potential skills gap around validation that should be highlighted to SSN and other support organisations.

Clare concluded by explaining that this is not a one person completion job. There is likely to be a whole range of people that need to be involved, it would be good to tell people earlier on that they need to sign it off soon.

The final slide in Clare’s presentation included an image of a timeline, Image B, to demonstrate how organisations should begin to plan their time.

Image B:



2.2d Climate Change Public Bodies Duties: Required Reporting- Practitioner Perspective Panel (Alan Speedie, SEPA; Chris Wood-Gee, Dumfries and Galloway Council; Ewan Hyslop, Historic Scotland)

The practitioner panel began with a few set questions asked by SSN Chair, Rebecca Bell, before opening up to other members for questions.

Q: How has involvement been on guidance process?

A: Chris- We report on all kinds of things and it's pretty much what we're doing already. This process has helped to concentrate minds. We might be just about on target for 2015 targets, but we all have a long way to go and we need to concentrate minds.

A: Alan- This isn't a race. This is a process that's been happening slowly and over time. This process will be a great assistance. It is a positive thing.

A: Ewan- It allows people to tell their story a bit more fully. We're particularly interested in the recommended side. It allows people to shout about what they're already doing. It allows for mainstreaming and getting climate change out of the close. It allows us to mainstream and play our part in the national target. We're ahead of the curve, most of the private sector is nowhere near us on this. It's not easy, it is difficult, but we all know that, we're ahead of the curve. We need both the carrot and stick. The stick is helpful internally, the fact that it's going to be required is helpful. If I have problems with procurement in my organisation, I can talk about this.

Q: What are some tips on how to get started?

A: Ewan- There is no shame at being at the start of the process. Three years ago with the PSSR, with waste we were nowhere and we had to say that. The process is a driver for change. There's no shame in saying we're only just approaching this or we can't answer this. The development process has been difficult to achieve uniformity, it will never be perfect for everyone.

A: Alan- Two words: Don't panic! Science is miles ahead of the policy, and the policy is miles ahead of the people. Don't feel you have to do it all yourself- build confidence within your organisation. Don't forget you have fantastic friends (SSN and others to help you!)

A: Chris- Use the resources that are available to you - there's loads of support! People do need to think quite differently about the way we are counting beans, and these are different beans to count, but we need to learn how to count them.

Q: What would you like to see in place to support Public Sector reporting?

A: Alan- These things don't happen by themselves. SSN and other organisations are available to provide the training needs and awareness raising. Informed support is amazing. There is also the potential for mentoring between organisations. SEPA is open to mentoring others.

A: Ewan- Sharing of information and experiences is really valuable. We're evolving all the time, the Climate Change agenda is so new and moving forward all the time. This process is one of continual improvement. It might not be easy at first.

A: Chris- We're all going through this process, we've been doing it for years. Transition from voluntary to mandatory is natural. If we get it wrong, we can fix it because we put it there in the first place.

Question from members: Do you (panel members) currently do validation, if so how, if not what would you suggest?

A: Alan- SEPA has done external validation for three years for Greening SEPA and the Sustainability Report (for both the data and narrative). It is not necessarily an easy approach. It can be challenging if the validator want changes. Having external verification sharpens the process because it means you have to have evidence to demonstrate what you are claiming. It did add 3 months to the process for external validation.

A: Chris- We have internal auditing for CRC but beyond that we haven't done any validation. Our current validation is based on what we've done through CRC.

A: Howard Steele - If you're going to go public with your report, it's a good idea to have that validated. You'll need to schedule that into your schedule. It's important to remember the fact that this supports the route towards compliance with the Public Bodies Duties and encouraging continuous improvement on them, and this is a good opportunity for practitioners to engage with their boards. This is an opportunity rather than a burden. Take the opportunity to work towards openness and transparency internally. There will be a timeline in the guidance to help people manage those steps towards producing their report.

A: Ewan- Finally I wanted to mention the recommended side as Historic Scotland is particularly keen on that side. A lot of stuff fell out of the required side that will be picked up in the recommended. This is how you tailor your report to you. It is important that the report feeds down and supports our roles in driving climate change in our individual organisations. The report needs to work hard on the recommended side for you. We all need to give that side more prominence as it allows us to talk about the good things that we do. Sustainability in its broadest sense is core to the public sector and we need to take the opportunity to use recommended reporting to promote what we do within this context. Don't shunt the recommended reporting to the side, this has the potential to support you and work for you internally.

A: Alan- Should we have some sort of means of recognizing the success of the reporting? Perhaps a certificate and celebration!

3. Consultation Discussion

SSN members formed into smaller groups to discuss the consultation questions, facilitated by SSN staff team or non-member consultants. The aim of this section was to collate feedback from the SSN membership to inform a collective response from the Network, and to support participants to contribute to their own organisation's consultation response.

The questions that were discussed include:

Content:

- Do you agree with the policy subjects and questions included in the proposed climate change reporting form (See Schedule 2 to the draft order)?
- Would you voluntarily provide additional climate change information if recommended by the Scottish Government?

Time & Resources:

- What would you consider to be an appropriate deadline date for the annual submission of Climate Change Public Bodies' Duties reports?
- Based on your current level of climate change/sustainability reporting, are there any additional resource implications associated with the proposed reporting requirement?
- How much time would your organisation expect to spend preparing a report in accordance with the draft order? (Include any external consultancy time.)

Validation & Authorisation:

- How do you think Climate Change Public Bodies' Duties reports should be monitored?

- What should the consequences be if a major player does not comply with the Climate Change Public Bodies' Duties?
- Do you believe Climate Change Public Bodies' Duties reports should be validated prior to submission? (Independent? Peer to peer? Internal? Not at all?)

More information about the Network's consultation response and the conclusions drawn from these conversations will be made available in the draft Network response to be circulated at the end of April 2015.

4. Cross-Organisational Collaboration on Reporting - Building an internal network for successful & effective reporting within your organisation

This session discussed briefly some of the aspects they will need to be considered for effective internal collaboration in order to produce an effective report.

Some of the key points include:

- Replicate the network that SSN has within your organisation. It is important that a space for discussion about reporting and climate change is created and that all the necessary parties understand their roles and remit within your internal network.
- Reporting is a great opportunity to speak to other people within your organisation, to get to know them better and to encourage buy-in – It will start the conversation and relationship, and you can then build from there.
- Reporting is going to be a process that isn't just done by one person in each organisation, so its important that you consider this when getting started.
- Consider the time it may take to get these relationships starting. Begin the engagement early. It is recommended that you start organising meetings in June with higher up people in your organisation to discuss what the process is. Try having those higher up lead meeting and engage those who will be involved.
- Accountability at the top level is important for the success of the report, consider what this looks like in your organisation? The person who signs off on the report needs to be high enough in your organisation to give it authority. This person needs also needs to be engaged in the reporting process as they will be accountable for its content.
- There are likely to be challenges around data flow. If we go to people right at the end to ask them to provide data, they aren't going to give you what you need. You'll need to engage providers of the data from the very beginning. You need to be involved in the process in order to know that it is accurate, sufficient, good data, etc.
- If you're struggling with accountability or data flow, the Climate Change Assessment Tool can help to get better accountability, better engagement, better data. Use this to improve processes in your organisation. This can be a starter to make other things happen in your organisation that are useful.

Using the ISM Tool to Support Reporting: Following the discussion about creating networks and building relationships internally from Clare Wharmby, June Graham ran a very quick ISM assessment of the barriers and opportunities associated with reporting to get the members starting to think in this way.

Some of the barriers and opportunities identified in this process include:

- shifting priorities; time constraints; falling budgets; processes around data; reporting infrastructure; understanding (individuals, colleagues, organisation, internal leadership, government); skill set; confidence in skills; politics; political party conflicts (government/COSLA etc); local authority election process around the trial period; science ahead of policy, policy is ahead of people; priorities; and individual values and organisational values.

Other Tools to Support Work on Climate Change: There's a number of tools that can be used to support this process. ISM being one of them, but this also includes others like **SSN's Public Bodies Duties E-Learning module**, and **RES's Climate Change Assessment Tool**.

The SSN E-Learning module on Public Bodies Duties on Climate change can help shift values, organisational priorities and norms, understanding, etc. It can act as an introduction to climate change and the public sector's responsibility for all public sector employees.

The Climate Change Assessment Tool (C-CAT) is a performance improvement tool that captures current organisational positions and helps set priorities and action plans. C-CAT can be used to run an inter-departmental workshop and get senior management on board. It can be a stimulus for getting the people together who will be responsible for the reporting.

Both are currently available on the SSN and RES websites respectively.

5. Advice and support on reporting: Taster Sessions

Attendees had the opportunity to visit different topic tables and get a taster of the range of practical support that will be available from SSN and its partners over the coming months.

Topic tables included:

- Carbon Accounting, Carbon Management and the CRC: getting the right data from the right place;
- Resource Efficient Scotland tools and support;
- Adaptation; and
- Behaviour Change and the ISM framework.

6. Concluding comments

The Sustainable Scotland Network's work programme for the next two years heavily features support for the introduction of Required Reporting and support on wider Recommended Reporting good practice. All individuals and organisations working on the new reporting template are encouraged to join as members of SSN and take advantage of the support that is on offer. A few points to keep in mind following the event:

6.1 Sustainable Scotland Network's Consultation Response:

The SSN team at Keep Scotland Beautiful is currently preparing the Network’s response to the Scottish Government’s consultation on Require Climate Change Reporting.

A consultation exercise was undertaken at the SSN Members Event on the 31st of March, and further input is still welcome. The following is the timeline for our consultation procedure:



There is still an opportunity to input into SSN’s consultation response. Please get in touch with Martha Halbert, martha.halbert@ksbscotland.org.uk, to do so.

More information about the consultation and climate change reporting can be found [here](#).

6.2 Preparing for Reporting events:

SSN as well as other partner organisations are in the process of arranging an array of events through the summer to prepare organisations to submit their first reports in the new reporting template. More information about SSN Member Events can be found [here](#).

6.3 Membership:

Keep Scotland Beautiful is funded by the Scottish Government to deliver the Sustainable Scotland Network and support all of the ‘major players’ in their work on climate change and sustainable development. We welcome colleagues from all departments and sections of the public sector to join as members. More information about membership can be found on our [website](#), or you can contact elizabeth.dirth@keepsotlandbeautiful.org to enquire about joining.

6.4 Event Resources:

All materials, presentations and resources from this event can be found in SSN’s Climate Change Portal at www.sustainable-scotland.net/portal.