

Sustainable development in higher education: Consultation on a framework for HEFCE

Response form

1. To respond to the consultation, please complete the form below and e-mail it to sustainabledevelopment@hefce.ac.uk by **noon on Friday 7 February 2014**.

Analysis of responses

2. HEFCE will commit to read, record and analyse the views of every response to this consultation in a consistent manner. For reasons of practicality, usually a fair and balanced summary of responses rather than the individual responses themselves will inform any decision made. In most cases the merit of arguments made is likely to be given more weight than the number of times the same point is made. Responses from organisations or representative bodies which have high relevance or interest in the area under consultation, or are likely to be affected most by the proposals, are likely to carry more weight than those with little or none.
3. We will publish an analysis of the consultation responses and an explanation of how they were considered in our subsequent decision. Where we have not been able to respond to a significant and material issue raised, we will usually explain the reasons for this.

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Respondent's details

Are you responding: • on behalf of an organisation

(delete one)

Name of responding organisation or individual	<i>The English Learning and Sustainability Alliance [ELSA]</i> ELSA brings together England's key stakeholder groups with interests in learning and sustainability in order to inform national debates and influence policy and practice. As a 'Group of Groups' its purpose is to lead, promote and influence the strategic policy discourse on learning and sustainability in all contexts across sectors and interests in England, working with key practitioners, strategic bodies and policy
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makers.

Change Agents UK
Consortium of Development Education Centres
Environmental Association of Universities and Colleges
Environmental Sustainability Knowledge Transfer Network
Technology Strategy Board
Forest School Association
National Union of Students
Society for the Environment
South West Learning for Sustainability Coalition
Sustainable Schools Alliance / SEEd
Transition Network

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Consultation questions (Boxes for responses may be expanded to the desired length)

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.'

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
		X		
<p>Comments</p> <p>We wish to distinguish between the extent to which this vision has been realised, and the degree to which this has been recognised in practice and as a coherent strategic objective.</p> <p>The 10 years since 2005 have seen a considerable increase in [i] the degree to which universities address sustainability and contribute to sustainable development, and [ii] the proportion of English universities that are now doing so. The 2008 Hefce benchmarking study provided evidence of work across all aspects covered by this vision, and a number of reports and studies have added to our knowledge and understanding since that point. Although we think that there is a positive story to tell about what has been achieved within and by institutions, at the moment, no one has a complete picture of activity, successes and gaps, and so it is good to see that HEFCE does intend to assess how far the 10-year vision set out in 2005 has been realised. We hope that this will be another comprehensive benchmarking of the sector.</p> <p>As to whether any success has been 'recognised', we note that the 2005/09 vision never made it clear whose recognition was sought. It seems to us, however, that there are at least six views on this that are of particular significance: [i] the UK government; [ii] English university leaders, staff and students (including NUS); [iii] employers and the professions; [iv] other UK educational sectors; [v] UNESCO; and [vi] the public / wider society.</p> <p>Part of the difficulty of responding to this sub-question is the extent to which this vision was recognised by key stakeholders in the first place. Clearly, government (ie, BIS) is aware, and judging by the content of recent funding letters to HEFCE, the Department appreciates what has been done, and is looking for a continuation and extension of this. For example, the 2013 grant letter recognised the higher education sector's "good progress on sustainable development", and called for further support to be given, "to build on the achievements of universities and colleges and the enthusiasm of students". This is clear "recognition" – and probably the most important sort given BIS's overarching role. It is also clear now that major business</p>				

interests are also pressing for wider understanding amongst their employees, including newly recruited graduates, as they seek support for translating theory into sustainable practice.

In relation to [ii], *English university leaders, staff of all types (academic and administrative) and students*, the picture is, inevitably, more patchy, in part, at least, because not everyone is particularly interested in sustainability. However, it would be a strange English university that did not understand, to some extent at least, that HEFCE is not only 'interested', but is also translating that interest into demands made of institutions, and opportunities provided for them to develop their policy and practices. As such, we think there is considerable understanding of HEFCE's policy and interests, whether or not its 'vision' is known or understood, and an end-of-Decade report to UNESCO is in preparation. There is strong evidence of continuing interest amongst the student body, as exemplified by recent audits.

In relation to [iii], *employers and the professions*, more focused efforts are clearly required. At a recent HEA Policy Think Tank on the Green Economy, employers were sceptical about the current mechanisms of engagement with universities on curriculum reform, especially with respect to the green economy. They believed that professional accreditation of degree programmes should play a much more incisive role in representing employers' interests, and specifying their needs. Further, professional bodies such as the *Science Council* and the *Society for the Environment* argue that there are currently no mechanisms for the professional accreditation of the growing number of multidisciplinary modular courses now being offered in higher education, which increasingly form a significant part of today's university curriculum. HEFCE and the HEA need to consider how more effective engagement with the professions and employers can be achieved. This is also reflected in one of the key recommendations from the Wilson review (2012), namely that:

"... strategies to ensure the development and recording of students' employability, enterprise and entrepreneurial skills should be implemented by universities in the context of the university mission and promoted through its public literature to inform student choice."

In relation to the others that are mentioned, other UK educational sectors, UNESCO, and the public / wider society, significant levels of understanding or recognition amongst these groups are unlikely to be realised, although reports to UNESCO UK have flagged up the contribution of the university sector. We think that this ignorance of what happens in universities in relation to sustainability is unhelpful, and that HEFCE needs to find a way of communicating what the sector (and it) are both doing and achieving. What follows, looks at particular aspects of the vision.

In relation to research and knowledge exchange, the document says: *"Universities are making intellectual and technical advances that help other organisations apply sustainable solutions and reduce their carbon footprint. Research is therefore of critical importance."*

The significance of this cannot be emphasised too much and it applies across disciplines – and across both research and teaching, although HEFCE does not emphasise the latter. There is then a passage which looks forward to the impact that the REF will have, not least on the impact that universities themselves have on society, the economy, culture, the environment, health, and quality of life. If this proves the case, it will be an improvement of previous exercises where, for examples, research outputs of an inter-disciplinary nature have struggled to find a niche within which to stand and be counted. HEFCE acknowledges this problem

whilst saying it has made 'enhancements'. The action point to "*publish the results of the REF in December 2014, and the submissions made by institutions including the impact case studies in early 2015*", was always going to happen. What is needed is a commitment to publish an independent analysis on all this which explores how good the research on sustainability has been valued in the REF. Only this will ensure that we understand just how effective this 'enhancement' has been.

Sections #39 to #47 of the document relate to a modern sustainable economy. The idea of the green economy has gained prominence mainly because it provides a response to the multiple crises that the world has experienced in recent years, in particular to the climate, food and economic crises. And it offers an alternative prospect of growth while protecting the earth's eco-systems and, in turn, contributing to poverty alleviation. In June 2012, the United Nations convened an international conference on sustainable development in Rio, Brazil. Its main themes were: a green economy in the context of sustainable development and poverty eradication and the institutional frameworks for sustainable development. The draft vision for the conference stated clearly and optimistically that:

"a green economy in the context of sustainable development and poverty eradication should lead inter alia to meeting key global priorities such as food security, more effective water management and access to modern energy supply systems. And lead to improved resilience, public health and sustained, inclusive and equitable growth that generates employment, including for youth."

In many regions of the world there is a growing and tangible policy focus on economic growth based on building a substantial 'green economy'. Indeed, the UK and many member states of the European Union are currently highlighting the potential impact of an emerging global 'green economy' on the world of work. Efforts to tackle climate change could, for example, result in the creation of millions of new jobs in the coming decades. There is little doubt that a changing climate will bring fundamental changes to economies and societies and skills will be needed to build adaptive capacity and take adaptive action. Developing this adaptive capacity across society will require research on what skills will be needed in the long term, and will demand a response by schools, colleges, universities and professional associations as well as governments.

All of this raises some important questions. Are our universities systematically creating the conditions that offer under graduates the context, understanding, skills and values that will prepare them for the challenges of creating a more sustainable future? Do the 180,000 academic staff have the expertise and capabilities to create these conditions? We currently have no real mechanism for assessing this in any meaningful way. Of greater concern is the fact that Universities UK, the organisation that represents the leaders of our universities, does not have the sustainability literacy of graduates on their agenda at all. Given the current pressure on graduate employment along with the 'tyranny of internships' and limited future job prospects, preparing future graduates for these uncertainties as well as those of global sustainability is an essential element of a university learning experience, and one which the coalition government should be committed to supporting and leading through a range of policy interventions, including encouraging and galvanising vice chancellors to address this issue as a matter of urgency. Without this support, future generations of graduates are in real danger of becoming disenfranchised from 21st-century society and losing their capacity as global citizens as well as missing opportunities to become skilled 'green' practitioners and entrepreneurs.

We believe HEFCE's sustainable development framework underplays the relationship of universities with their local and regional communities and economies. The current concerns about graduate unemployment and under-employment, and the role that a green economy could play, offer universities the opportunity to establish themselves as 'thought leaders' in this respect, through representation and participation in local enterprise partnerships and taking an active role in emerging transition initiatives.

We hope that HEFCE will give universities greater encouragement (and incentives, perhaps) to encourage them to explore the idea of becoming social enterprises which can be 'urban innovation engines' in regional economies, contributing through skills development and knowledge transfer to the social and environmental transformation of their area. For example, universities are perceived as reservoirs of expertise in community-related areas such as policing, law, health and community care, education, local economic development, planning and environmental protection, all of which offer opportunities to socially responsible investors. However, all of this will require HEFCE and financial institutions to broker and stimulate this kind of innovation.

The discussion document says: "*Universities are well placed to contribute to this transition [to a green economy] in many ways: through skills development, research, innovation, knowledge exchange, policy development, and stimulation of the demand for goods and services.*" In other words, through everything they do. The statement might well have included the 'housekeeping' activities of universities, and their relationships with local and more distant communities. In other words, through everything they do. The next sections contain a helpful summary of the impacts of such an economy, with examples of HEFCE policy impacts in #45 / #46, and an action point promising to "*make the case for further investment and identify opportunities where our funding can contribute to the development of a modern sustainable economy*". It is hard to see why HEFCE doesn't just promise action, rather than making the case for this.

#47 notes that the *National Centre for Universities and Business* was recently established to strengthen collaboration between universities and business, while the action point says that HEFCE will discuss with the Centre how sustainability should best be incorporated in its future work. We strongly support this.

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
	X			
<p>Comments</p> <p>HEFCE has a good story to tell about university management, particularly how it has helped institutions reduce carbon (and other) emissions, with its <i>catalyst fund</i> and <i>revolving green fund</i> being prominent examples of very successful interventions, building on initiatives that had their origins as far back as the early 1990s. #50 notes that a number of universities are expanding teams, and making senior appointments, with broad responsibilities in sustainability, and that, “<i>enhancing the ability of people and organisations through capacity-building is crucial for the transition to sustainability</i>”. This is something that HEFCE will continue to support, which is welcome, though we think that it is not the size of a team that matters or should form any metric, but commitment from the top. We are aware that, in a growing number of universities, these “senior appointments, with broad responsibilities in sustainability” now embrace curriculum as well as carbon, seeing these in an integrated fashion, and not as separate aspects of university business. We think this is something to encourage.</p> <p>What is notable in sections [#48 to #62] is that learning gets only one passing reference. This is in the Green Gown Awards 2012 box [p. 19] where it is acknowledged that students in the University of Bradford student village, <i>The Green</i>, experience life in a high-performing building while learning about sustainability. In this sense, HEFCE seems to lag well behind the development curve, and its action point to support the 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, would be more convincing were learning at least to be mentioned.</p> <p>Whilst HEFCE is understandably chary about being seen to advise or prescribe on curriculum, surely stressing that learning, viewed both broadly and in an integrated way, is important, is a risk worth taking.</p> <p>Only two paragraphs [#61 / 62] are devoted to Information and Analysis, where the work of EAUC's <i>Sustainability Exchange</i>, <i>Learning in Future Environments</i>, and the <i>EcoCampus benchmarking and accreditation schemes</i> are dealt with in twenty-six words. Despite the very significant funding that the Council has provided for these (and for quality-related curriculum initiatives) over time, none of their effectiveness has been evaluated. In the action point that follows, HEFCE promises to “<i>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</i>”, although what this means is quite unclear, not least in relation to what the ‘<i>broadly consistent approach</i>’ is going to be <i>to</i>.</p> <p>#62 addresses the issue of performance indicators, and the action point is to considered the introduction of sustainability indicators following a fundamental review of performance indicators [PIs]. This is welcome, especially if a wide view of <i>sustainability</i> is to be taken – that is, one where issues around learning are integral. It is hard to imagine that HEFCE sees this as being in any sense straightforward, and it could be that it is the learning and awareness-raising that comes from a</p>				

consideration of PIs which will be the most lasting outcome.

The document rightly applauds the success of NUS in reaching 77 universities with their 'award-winning' sustainability programmes, and so its surprising not to see a HEFCE action point alongside those in #31 to work with NUS so that *all* English institutions take part. NB, the action point in #32: "*The forthcoming review of the NSS may identify the potential for including questions about sustainable development*" is rendered meaningless by the word "may". What is HEFCE trying to say here?

#21 and #34 highlight, through a focus on the successful NUS / HEA student surveys, the clear importance of sustainability to students, both as an idea, and as something to study and practice in daily and working life. #34 then refers to newly-drafted QAAHEA guidelines for institutions on the skills, aptitudes and knowledge that students will need, noting that these will be published in 2014. Whilst we welcome the development of these guidelines, as currently drafted they are over elaborate and far too detailed. Unless they become less prescriptive, and clearer as to how they relate to existing practice, we fear that those in the academic community who are unfamiliar with an increasingly specialised and arcane ESD discourse will have little incentive to take any notice of them. It is clear that the levels of conceptual abstraction that now underpin much of the literature on sustainability and ESD is not only unhelpful to those who are not centrally involved in the debates, it is a deterrent to academic course planners to become engaged at all.

Further, unless an appropriate engagement strategy is developed, which deals with academics on their own terms (ie what they are interested in, and do), we think that this effort will go the way of the previous attempts to change practice through the development of guidelines by cadres of experts, and be a mere footnote of interest only to historians. No one wants to repeat the lamentable experience of the HE21 initiative.

The impressive, but daunting, list of 50+ learning outcomes raises three particularly important questions that have not yet been addressed.

The first concerns our view that what is set out here frames an education, not for a three or four period in a university, but for life-long, active citizenship and learning in both workplace and social contexts. As such, pertinent though all these outcomes and attributes undoubtedly are to a university experience, it is doubtful whether they can all be fully developed within the period of a university degree. In part, this is because of the limited time available, but, more crucially, because it is the making of real-life decisions, that most fully enables, in an iterative, developmental manner, the capacity for exercising such citizenship. In this sense, it seems reasonable to assume that most of what is set out here will continue to be developed in the workplace, or just in life. It is not obvious that the guideline drafters understand this; rather, the guidance seems to assume that the end of a degree is, in fact, the endpoint of such development. This is demonstrably wrong.

The second concerns the degree to which institutions can pick 'n' mix from this list. Because of the way that the guidelines have been framed as a representation of *sustainability*, there is a sense that it *is* all or nothing; that you cannot just choose what you fancy from the learning outcomes because, if you do, then you have lost the essence of what the whole is. Clearly, it would be absurd to think that you could only adopt a handful of the outcomes and claim that you are somehow addressing sustainability. So, do you have to select them all? We think not. But, if not, what is

to guide, say, Fine Art and Physics academics in what, we assume, would be different choices? The guidance says nothing about this rather important representational question which is at the heart of the validity of what ensues, on the ground, from all this.

What in our view would be most helpful for students and staff would be to provide a general understanding of the contested meaning of the term 'sustainability', and then to support applications and interpretations within disciplines or cognate areas. Providing interesting and practical exemplars written in the language of the relevant discipline, and encouraging small steps that lead people towards a wider and deeper understanding, would be very useful, and we are pleased to note that HEA is encouraging such developments and guidance within discipline teams. We believe that the timely production of disciplinary guides for academic practitioners would complement the publication of the QAA Guidance on ESD and encourage greater interest in and scale up the integration of ESD across academic programmes. The HEA and HEFCE should make this a key priority and make appropriate resources available for their development, publication and above all dissemination, making sure that these build on, rather than duplicate, existing resources; for example: *Greener by Degrees: exploring sustainability through higher education curricula*.

The third question relates to who is to do the teaching associated with all this learning. That is, who currently has the necessary academic background knowledge, understanding and scholarly abilities. We think it optimistic to suppose that such skills already exist, or that they are in any sense well-distributed across the sector. If HEAQAA has a plan to address this lacuna, we have not seen it.

In the next section [#35], HEFCE says, that the Higher Education Academy will continue supporting:

- universities in meeting the agendas for education for sustainable development (ESD) and global citizenship, and in working with professional and sector bodies and staff in subject communities to support ESD
- the development of graduates equipped to contribute to a modern environmentally sustainable economy
- universities through the Green Academy, or similar change programmes to introduce sustainable development into the curriculum.

... although it is far from clear the extent to which HEA is committed, as an organisation, to these. Whilst it is the case that HEA funds a 0.5 fte academic lead on ESD, and that that person has done an effective job, particularly in relation to the Green Academy, he has not had *effective* internal support from the HEA. Such support has been provided by an external advisory group, but this also lacks articulation with HEA senior leaders respond to suggestions. It may be that the commitment is in place, but this requires demonstrating in their actions. It may be that HEA tells HEFCE that all this is fine, and that commitment is in place, but it is not clear just how closely HEFCE monitors this. The reality is that HEA is an organisation that sees ESD as marginal, not integral, to its activities. In this sense, HEA and HEFCE are completely out of step with each other in terms of vision. HEFCE really should take much more interest in how HEA leadership operationalises "*sustainability [as] one of the 12 priorities set out as a condition of receiving ... funding*". The HEFCE action point on this is to "*continue to support the work of the Higher Education Academy and others who can contribute to education for sustainability*". This seems inadequate when there is also a need to monitor carefully what the HEA, QAA and others, actually do.

The extent to which HEA is working with professional bodies is also unclear, despite the assertion in the first bullet point, HEA has never, for example, approached Society for the Environment, to discuss collaboration. Society for the Environment is the organisation overseeing the award of professional recognition through its Royal Charter, to qualifying individuals who demonstrate sustainable practice. The Society has now licensed twenty-three of the largest professional bodies in the UK, embracing a wide range of Institutes from engineering, built and natural environmental professions, materials production, energy through to environmental management; their total membership approaches half a million people. Such collaboration could be genuinely fruitful territory. The reality is that HEA is an organisation that sees ESD as marginal, not integral, to its activities.

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
		X		
<p>Comments</p> <p>The background to why sustainable development needs to be taken seriously, is set out in sections #16 to #20, including a graphic reference [#21] to the positive view of sustainability that students have. This is clear and compelling, as is Lord Stern's summary in #22:</p> <p style="padding-left: 40px;">‘It is crucial that the sector contributes strongly to sustainable development. It can do so by training and expanding minds; researching answers to challenges and informing public policy; showing its own understanding and commitment through careful campus management; and by being a responsible employer and active member of the business and local community.’</p> <p>... although Stern might have added that there are synergies to be had when these actions are brought together within institutions that understand the big picture, and have an integrated and strategic view of their own contribution.</p> <p>With this in mind, it is appropriate that Hefce proposes to update its 2005/09 vision statement. The proposed draft reads:</p> <p style="padding-left: 40px;"><i>‘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 their own business management.’</i></p> <p>This now makes explicit the leadership role expected of the sector (though the role of university leaders themselves remains implicit), and recognises that graduates’ attitudes are as important as skills. It is unclear, however, why graduate <i>knowledge</i> (or more appropriately, perhaps, <i>understanding</i>) has been lost, given how important this actually is. Thus, the vision might easily have said:</p> <p style="padding-left: 40px;"><i>Our vision is for universities to be widely recognised as leaders in society’s efforts to achieve sustainability – through the <u>understanding</u>, skills and attitudes that students gain and put into practice, through research and knowledge exchange, and through their own business management.</i></p> <p>... though this still misses the synergy point made above. Actually, this was clearer in the 2005/09 statement as this referred to institutions’ “<i>own strategies and operations</i>”, as opposed to their “<i>own business management</i>” in the proposed version. This does not seem an improvement. Thus, it might say:</p> <p style="padding-left: 40px;"><i>Our vision is for universities to be widely recognised as leaders in society’s efforts to achieve sustainability – through the <u>understanding</u>, skills and attitudes that students gain and put into practice, through research and knowledge exchange, and through their own <u>strategies and operations that bring all these together</u>.</i></p> <p>This makes the synergistic point explicitly, and ensures that HEFCE’s vision sits easily alongside that of those English institutions who are already showing international leadership. This is a necessary position for HEFCE to take. That said,</p>				

it is good to see that HEFCE intends to assess how far the 10-year vision set out in 2005 has been realised.

We also believe this has echoes with what a recent European Commission report on Modernisation of the European Higher Education system suggests:

“That which is known is no longer stable. The shelf-life of knowledge can be very short. In many disciplines what is taught and how it is taught are both stalked by the threat of obsolescence. In a changing world, Europe’s graduates need the kind of education that enables them to engage articulately as committed, active, thinking, global citizens as well as economic actors in the ethical, sustainable development of our societies.”

This report puts the quality of teaching and learning at the heart of the modernisation debate in higher education. And we believe that learning for sustainability in its widest sense is a key ingredient of what a 21st century high quality higher education experience should provide.

“The citizens of Europe have a considerable collective vested interest in the quality of our higher education systems. The individual student has a huge vested interest in the quality of his or her higher education. The graduate who has received high quality teaching is more likely to be adaptable, assured, innovative, entrepreneurial and employable in the broadest sense of the term.”

This is why the current development by QAA and HEA of Guidance on ESD is so crucial to the development of our thinking on quality and standards in higher education. We believe there is a significant opportunity for HEFCE, HEA and QAA to explore the strategic opportunity to integrate sustainable development into institutional quality assurance and enhancement procedures. The QAA commissioned report ‘*University Challenge: Towards a well-being approach to Quality in HE*’ (nef, 2007) offers a visionary approach towards this strategic objective. HEFCE’s objectives embrace the concept of extending good practice. However, there is a major challenge here because there is no universal agreement on what constitutes good practice in ESD. There are 2 distinct processes which need further elaboration: first, the process of identifying good practice; second, the process of sharing and embedding that practice. At a national level there is little research into both processes. Research in FE (Cox, 2007) indicates that simply raising awareness of good practice through publications, web-sites and conferences is insufficient to change practice.

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
			X	
<p>Comments</p> <p>The final section of the paper [#63] is on HEFCE's own commitment. In many ways this is exemplary, and sector-leading, and it is a great pity that other organisations do not express similar levels of support. The HEFCE policy objectives and targets relate to: business ethics, managing environmental impacts, procurement, our people, the community, and working with the sector, and there is an action point to continue to improve its own CSR performance and report publicly on progress each year, which is commendable. It is unclear whether this commitment extends to HEFCE (and its 'people') learning their way into sustainability. If not, this is a pity, as that really would be sector-leading.</p> <p>Annex A sets out the main actions and engagements by HEFCE since the publication of 'Sustainable development in higher education' (HEFCE 2009/03) in 2009. This is almost exclusively a list of direct carbon-related initiatives, although HEFCE's support of 11 projects funded under its <i>Leading Sustainable Development in Higher Education initiative</i> is included. The Annex (indeed, HEFCE more generally) does not say whether the impact of this initiative was ever measured, despite a prior commitment to do so. Given the considerable amount of money that was committed here, not all of which seems to have been well-spent, and the general good practice of evaluation, this seems an odd omission. The Council needs to ask itself how it is going to make good decisions the next time such an ambitious proposal emerges, if it has not learned the lessons from an independent evaluation. Further, more openness about decision-making in relation to funding these would also be welcome.</p> <p>In #27, HEFCE says it seeks to "<i>raise the profile of sustainable development as central to higher education</i>", whereas the reality is that sustainable development and higher education are each central to each other. It is a pity this point is not made.</p> <p>Whilst it is now appropriate that HEFCE introduces sustainability into the terms of reference for all its strategic committees [#28], it also needs to review their composition to ensure that there are sufficient appropriate expert voices to make sense of the change of remit.</p>				

Consultation question 5: Do you have any suggestions for improving the Revolving Green Fund?

<p>Comments</p> <p>We think that all future <i>Revolving Green Fund</i> projects should require a clear reference to how proposed activities contribute to the understanding and skills of current and future students in relation to new approaches to carbon reduction, making this an required part of any project.</p>
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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?

Comment

The key themes are:

1. Supporting students
2. Education for sustainability
3. Research
4. A modern sustainable economy
5. Business operations
6. Information and analysis
7. HEFCE operations

Whilst, *prima facie*, there is little to disagree with here (even if we might not have used quite this language), the fact that the themes are listed and numbered separately, with no hint that they are inter-related and inter-dependent, is a problem as it rather misses the point about sustainable development. At the very least, an 8th point is needed which makes it clear that any such themes are inter-related and inter-dependent. For example: 8. *The inter-relatedness and inter-dependence of these themes*. Ideally, of course, this would be the first point to be made.

In terms of omissions, *institutional leaders and leadership* might well be added, if only to make the point that leaders and what they do are of paramount importance. Further, a theme of *community and social embeddedness* would help make the point that universities are not islands of excellence that can exist without networks and inter-relationships with other institutions, locally, nationally, and globally.

NB, comments on the action points relating to these can be found embedded in this response. We note, in passing, that the headings used in Annex B are not the same as the 'key themes', and are rather confused by this.

Consultation question 7: Do you have any other comments on our approach to sustainable development?

Comment

The higher education sector has a major role to play as a catalyst to help create inclusive, sustainable societies and economies by investing in human development and social capital. The sustainability challenge requires bold innovative solutions which must harness the specialist as well as local knowledge which will emerge from new ways of thinking and new attitudes and values and the engagement of people of all ages and from all walks of life. Universities are best placed to be the regional / local intellectual and learning engines for such change, and HEFCE has an opportunity to stimulate them to be more innovative in developing their respective communities through social and ethical enterprise with sustainability as a guiding principle. HEFCE needs to see this framework as an opportunity to make significant things happen.

We think HEFCE should get over its reluctance to talk about learning, and we wish it would say that learning, by everybody, is crucial, as sustainable development depends on learning. Actually, we'd like HEFCE to say that sustainable development *is* learning and that many in higher education are particularly good at it.

We think that HEFCE needs to have more of a commitment to routine and longitudinal evaluation.

We think that HEFCE's strategic and operational approach to sustainable development has been weakened through the dismantling of its sustainable development steering group. This brought together experts from across institutions and sectors with expertise in HE *and* sustainable development. When this operated, it was clear where HEFCE's advice on sustainable development came from. Now this is quite opaque, and we think much greater clarity is needed. Embedding sustainable development experts into key HEFCE committees, may be a positive step here.

The *English Learning and Sustainability Alliance* [ELSA]

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