

**Consultation on OfS Strategy 2022 – 2025
EAUC Response – December 2021**

Question 1 Proposal 1: Do you have any comments to make on the OfS’s proposed strategy for 2022 to 2025 or the priorities set out within it?

EAUC – The Alliance for Sustainability Leadership in Education - expect the OfS to pick up and lead on student’s clear climate and sustainability expectations of their universities to deliver future focussed net- zero employment. We are therefore disappointed and concerned that the only reference to sustainability in the consultation is related to financial sustainability. This is short sighted, out of touch with the UK Government and shockingly out of touch with not only the current climate crisis but the student voice.

SOS UK Sustainability Skills Survey 2020 – 2021 is a national online survey completed by over 8000 students in October and November 2020, building on data gathered through 10 years of previous research. Results included:

- 81% of respondents agreed that Universities and Colleges should be obliged to develop students social and environmental skills as part of the courses they offer
- 65% cite a role that contributes to helping the environment as an important factor in applying for jobs

Also very disappointing, there is no reference in the consultation to the United Nations Sustainable Development Goals (SDGs) and their contribution to levelling up nor is there an explanation as to what levelling up actually is and how it will be achieved.

EAUC’s view is that there is a complacency within OfS and that more of ‘business as usual’ will suddenly start to work. The world is changing fast, the climate is warming and biodiversity is collapsing. Education is at the heart of how we respond to these threats to turn them into opportunities to design a net-zero and equitable world. OfS’s role should be to ensure that every student whatever their course is given the best possible education to have the insight, skills, understanding and personal and employment resilience to succeed.

The Climate Commission for UK Further and Higher Education recommendation is for all universities (and colleges) in the UK to have net-zero emissions for Scope 1 and 2 by 2030 as a minimum and to include Scope 3 no later than 2050. We urge the OfS to include this requirement within their strategy.

Question 2 Proposal 1: Do you have any comments about any unintended consequences of the proposed strategy or the priorities set out within it, for example for particular types of provider, particular types of student, or for individuals on the basis of their protected characteristics?

OfS should ensure it is reaching a more diverse and wider breadth of students than it currently does. In the proposal student mental health is listed as a strategic priority. The student voice is clear on the detrimental effect climate anxiety has on mental health. Your negligence on this agenda undermines your credibility and your strategy of ensuring that every student has a ‘fulfilling experience of higher education that enriches their lives and careers’.

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According to research by the charity Global Action Plan in 2020 77% of students say that thinking about climate change makes them anxious and in the UK as many as 1 in 6 young people will experience an anxiety condition. Students need to be learning how to combat the climate crisis and being empowered to create change. Since 2014 National Union of Students (NUS) and now SOS UK have been tracking student's attitude towards climate change and respondents have consistently shown high levels of concern about climate change, with a majority saying they are fairly or very concerned.

Under the Quality and Standards goal "provides secure free speech within the law for students, staff and visiting speakers. While EAUC are of course supportive of legal freedom of speech, there is a fine line between free speech and endorsing hate. This can have a much greater negative impact on already marginalised and minority groups. Freedom of speech within the law also extends to climate and social justice campaigners, for example Extinction Rebellion and Black Lives Matters. As well as encouraging debate and discussions on decolonising the curriculum, the right to peaceful protest, institutionalised racism, police brutality and divestment. Without this there is a real risk of alienating students.

Question 3 Proposal 2: Do you have any comments to make on the proposed addition to the regulatory framework?

We have no comments to add here.

Question 4: Are there aspects of proposals 1 and/or 2 you found unclear? If so, please specify which, and tell us why.

We have no comments to add here.

Question 5: Do you have any other comments?

We continue to be vocal in the concern about the Estates Management Record (EMR) data losing its mandate for English institutions. We believe the EMR should be mandated and is due an update. We asked our members, and the vast majority of them want EMR data input to remain a statutory obligation for institutions. They said that it was the only way to ensure universities comply and give a large, valid and robust dataset **and ensure transparency and accountability to students and other stakeholders** That being said the emission profile of institutions is now very complex and the current reporting requirements only include a limited number of emission categories. This too needs an update and is why EAUC is in dialogue with the Department for Education to address this using the Emissions Alignment Framework currently in development across the EAUC. This Framework will then ensure consistent emissions reporting across the FHE sector. The absence of mandatory university regulations for climate action and sustainable development was highlighted in the Student Climate Commissioners COY16 Student Statement which was developed by student focus groups. (https://www.eauc.org.uk/student_climate_commissioners_publish_coy16_stu)

Get in touch!