

Response submitted online

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Dear HESA,

Please find below our consultation response on HESA's overall service offering and subscription model.

EAUC – The Alliance for Sustainability Leadership in Education:

Response on behalf of our Members (United Kingdom and Ireland)

About the EAUC

Our passion is to create a world with sustainability at its heart. That's our vision. We exist to lead and empower the post-16 education sector to make sustainability 'just good business'.

The membership of the EAUC comprises higher and further educational institutions, with a combined budget of some £25 billion, responsible for educating over 2 million students supported by half a billion staff.

We have regional and country chapters, with member institutions connected deeply with business, industry, health and civic bodies at local levels, with reach internationally via their research, innovation and student mobility.

We believe

- That UK and Irish education should be a global leader in sustainability
- That educational institutions have a responsibility as anchors in their communities to be agents of change
- That education has a unique opportunity to transform lives and communities
- That education is at the heart of global sustainability
- That every student should have access to sustainability education
- That education should reflect best practice in operational sustainability
- In being flexible and adaptable to find solutions for a resilient future
- In the value of international collaboration

Our values

- Pioneering - driving sustainability through innovation
- Independence - our own unique voice
- Collaboration - together we go further
- Role Model - leading by example
- Empowering - supporting and inspiring our members

Responses to Questions for Inquiry

- ***How effective has the Government been at engaging stakeholders in the voluntary national review process, in particular people in vulnerable groups;***

There has not been enough engagement with stakeholders on this topic, and it shows in the lack of case studies that were submitted domestically for the VNR. The stakeholder engagement events were good, but it was too little too late.

The VNR process as a whole is limited in terms of scope and reach. The process does not seem to include evaluation of what the Government itself has done, and largely focuses on quantitative data from the ONS, which is not particularly insightful, as well as a request for ‘policies and projects’ from society for the qualitative side of information. They do not appear to have allowed enough time to collate information and have not worked with civil society to any great extent on the SDGs since the UK committed to the SDGs in 2015. As such, it feels very much like an activity aimed at simply promoting what has been done rather than evaluating whether the UK has fulfilled its obligations to the SDGs.

The VNR appears to be a PR activity, rather than a ‘review’ that is analytical in its approach, including a gap analysis together with benchmarking data. Positive contributions should be commended, but we must work out where more needs to be done to reach targets. Best practice should be highlighted with enablers and barriers to fuller engagement identified. The ‘Key areas for further work’ in the Emerging Findings document do not sufficiently do this.

For the SDGs to be delivered, they must be embedded into society, integrated into policies, strategies, plans, reporting, engagement, marketing – and be part of everything we do. This review should encourage initiatives that contribute towards delivery of the SDGs, emphasising the need for them to be integrated rather than standalone. Requesting ‘policies and projects’ is a useful first step but insufficient alone.

It is the considered view of EAUC that DFID should no longer assume responsibility as the lead department for the UK’s implementation of the SDGs. The current positioning of the SDGs in this department means that sustainable development is seen as an ‘international development’ issue, rather than a national strategy for inclusive growth. As such, the agenda of the SDGs is not leveraged to drive action on domestic issues of sustainable development that include education and health alongside equality and economic success. This means that an integrated strategic approach across Whitehall connecting the goals of the SDGs with national planning has not been taken, and this must be remedied.

- ***To what extent has the Government followed the UN’s guidance on Voluntary National Reviews in conducting its own process;***

There are elements of the VNR that follows UN guidance, but there are also areas that are lacking. The UN suggests:

“They [VNRs] are most productive when they produce tangible lessons and solutions, and when they are followed by action and collaboration that drives SDG implementation.”

“The review could address how different groups, particularly women and young people, have been engaged and how direct citizen engagement has been facilitated.”

“It would be desirable to describe critical difficulties encountered in reaching them and how they could be addressed, referring, when appropriate, to data provided in a statistical annex.”

There is no clear evidence in the Government’s Emerging Findings document of tangible lessons and solutions, and very little on how the Government will further collaboration with civil society to drive SDG implementation after the VNR.

Little has been done to engage with women and young people. So much so, that we are in the midst of monthly student strikes over Climate Change and the Government still fails to acknowledge the views of young people on this topic in any serious way. None of the stakeholder engagement events particularly catered for these audiences either. We attended a local delivery VNR engagement event, there was one student, and the student stated how frustrating it was that young people were not being listened to by the Government.

There is a huge issue with the VNR failing to identify areas of difficulty. The ONS SDG data can identify areas in which they struggle to find data sources, but otherwise there is little information on this until benchmarking is in place, and gap analysis hasn’t been prioritised as of importance. At the aforementioned stakeholder engagement event, when asked about gap analysis, DFID pointed to the report ‘Measuring Up’ by UKSSD – a cross-sector network of civil society organisations and businesses who work together to drive action on the UN Sustainable Development Goals in the UK. This report identifies areas of weakness in the UK on the SDGs. EAUC is proud to be a member of UKSSD, and to have had a helping hand in this report, but the Government should not be pointing towards a report from civil society as their main mechanism for gap analysis on the SDGs when they are running an exercise as large as the VNR. They should use this report as a jumping off point and look to put in place a consistent evaluative process to identify gaps in SDG implementation domestically and internationally.

- ***How well does the Government’s Emerging Findings document reflect the progress that the UK has made domestically on implementing the SDGs;***

The Government’s Emerging Findings document states: “The Global Goals work firmly for the national interest as well as for people and communities around the world.”

Yet, as the Environmental Audit Committee in the week of 10th January 2019 stated, there is a “doughnut shaped hole” in domestic implementation of the SDGs, which sees SDG 2 – Zero Hunger – as a material miss. The rise in foodbank usage is clear evidence of this. From the Emerging Findings document, this is not apparent.

This also highlights why DFID is not well placed to lead on the SDGs as it struggles to ensure domestic delivery and has so far not produced the results that as a country we should be capable of delivering domestically and internationally.

- ***To what extent does the Government’s Emerging Findings document build on and develop further existing published analysis of the UK’s performance in implementing the SDGs domestically.***

There is very little published analytics of the UK's performance in implementing the SDGs domestically other than the UKSSD report, and updates from ONS. We would not say the Emerging Findings document goes further than either of these documents – it contains very surface level information.

- ***What further information or analysis the Government should look to include in its final submission to the UN High Level Political Forum.***

We would like to see the case studies submitted to the VNR made publically available.

We would also like to see the VNR point to some more overarching SDG progression and cohesion steps, for example, they should look to set up a multi-stakeholder SDG advisory group, and to more clearly outline how the SDG VNR is going to feed in to the Government's SDPs.

Also, the Government should look to attend more of the fringe HLPF sessions, and better research who else from the UK will be attending the HLPF. One of the key SDGs of focus for the HLPF this year is Goal 4 – quality education. There will be a day long fringe event at the HLPF on Higher Education and its role and contribution to the SDGs, run by the Higher Education Sustainability Initiative (HESI) - a partnership between United Nations Department of Economic and Social Affairs, UNESCO, United Nations Environment, UN Global Compact's Principles for Responsible Management Education (PRME) initiative, United Nations University (UNU), UN-HABITAT, UNCTAD and UNITAR.

EAUC, from which we are submitting this response, will be attending this event – as we did last year. We are heavily involved with the SDGs within tertiary education in the UK, as well as globally – having created and facilitated a huge global platform called the SDG Accord. We attended the HLPF in July 2018 (as we will continue to do annually), presenting the [SDG Accord](#) report at the HESI event as it is an officially recognised HESI tool. The [SDG Accord](#) is a high profile International initiative that EAUC developed to ensure tertiary education was committed to playing its part in meeting the SDGs. This is a partnership initiative, with support from the UN's HESI and many other global partners. It was launched at the end of 2017, and we currently have official commitment to the SDG Accord and its tenets from 102 Vice-Chancellors/ Principals and their institutions; of these, 42 are based in the UK and Ireland. There is a ground swell of support here from this sector, and yet, when we have tried to engage with DfID on this topic, we have received little interest or support. In advance of attendance of the HLPF last year, we also reached out to the UK delegation to discuss the role of education, but again, received little interest – which is disappointing and a real missed opportunity for the UK Government to learn more about what its universities and colleges are already doing on the SDGs. In fact, we were the only UK attendants at the HESI event.

You can find EAUC's consultation response to [IDC on the SDG VNR here](#).

Yours sincerely,



Iain Patton, CEO, EAUC