

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

Response to the consultation questions

3. Do you use the data included within this record?

Yes

4. If so, for what purposes?

We use the EMR data in partnership with AUDE and Arup in a reporting mechanism called the Sustainability Leadership Scorecard (SLS). This builds on AUDE's Green Scorecard which also used the EMR data. The SLS is a transformational 'All in One' tool which captures data and performance from many sources and builds one definitive picture of an institutions performance. Automatically pulling the EMR data through saves institutions valuable time and resource, while allowing an institution to understand where they are in their holistic approach to sustainability, and assess where they need to set new targets, monitor and improve progress. It is essential to have a comprehensive set of data for all regions for this to be effective.

Our members also use the EMR data. Our membership is made up of over 200 UK and Ireland post-16 education institutions (80% of UK & Ireland HE sector represented). Members use the EMR data to identify where they are in comparison with other institutions, which enables Sustainability departments to push decarbonisation up the institutional agenda and get senior buy in for sustainability measures. Without this data, and without having it for all regions, it will be even more difficult for them to do this.

At this stage – we would also like to make it clear that we do not support the move from statutory to non-statutory for the collation of EMR data in England. While this has been an Office for Students decision, we feel HESA could have played a stronger role in outlining why EMR data should remain statutory. Wales, Scotland and Northern Ireland have retained EMR data as statutory for Higher Education Institutions (HEIs), and in light of the current declarations of climate emergencies and climate strikes from students and Extinction Rebellion, to downgrade the importance of the collation of this information seems particularly counterintuitive. 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.

5. Does the access to the UK-wide picture determine much of the value of this collection?

Yes

Increased competition among HEIs for students means that they are constantly looking for ways to raise their profile. The EMR data encourages healthy levels of competition to be the most sustainable and enables institutions to benchmark and make targets for their own progress in the wider context of the UK-wide picture. This is essential to the progress of sustainability in this country as a whole.

6. With what frequency would the data need to be collected to meet your needs?

Annually – by academic year, as is currently the case.

7. Are there any areas of the collection that you feel are not necessary?

We asked our members, and 30% said there are areas that are unnecessary in the EMR data.

They provided the below feedback:

- Scope three emissions have so many variables that it is not apparent if it is actually a useful data set to collect. Particularly staff and student commuting carbon estimations as they are essentially guesswork. Scope 3 needs a more robust methodology.

8. Are there any areas that are not currently collected, but which you would like to be collected?

We asked our members and 23% said there were areas that are not currently collected, but they would like to be.

They provided the following feedback:

- There should be a section for IT infrastructure. It is such a vital part of HEIs but currently very difficult to benchmark as there is no unified data set. JISC would be best placed to advise on what should be included.
- Provision of green space, in appropriate unit (maybe m²) would enable tracking of net gain or net loss each year. This would require careful definition but at the moment there is no hold on this, and it could be a way to hold universities to account for estate growth on green space.

9. If so, what and to what purposes would you put it?

85% of members that responded to us, said they used the EMR data within their institution.

They provided the following information on what they use it for:

- Monitoring and as a 'single source of truth' for much of their data.
- Environmental information feeds into the People & Planet University league.
- Historic data enables them to track trends within the university and benchmark/ performance report.
- Senior Management (especially Board of Governors) reporting.
- Looking across the sector and understanding how they compare, use space, reduce emissions, etc.
- Travel data - model split of students and staff transport modes.
- Making the business case for sustainability initiatives.

10. Are you likely to continue to subscribe to this record when the cost is part of a voluntary subscription?

Most of our members were unsure.

We asked members this question and just under half said they were unsure, while 38% said they would still use it and 15% said they would not use it anymore.

Feedback they provided on this question included:

- It would be budget and cost dependant
- This would be a senior management decision but ultimately the benefit of allowing comparisons across universities would likely sell it to management.
- They would need assurances around quality and reliability of the data.
- The dataset provides great value to the sector so it is worthy of investment if required.

From this information – we would ask HESA to be clear on costs before going ahead with data collation, as many institutions will need a business case to sell continued involvement to senior management and this must include costs and a clear ROI. Paying for this, coupled with it being downgraded to non-statutory, will really put off some institutions. This is further problematic, because if the number of institutions that submit data in England diminish, then the data set as a whole becomes less valuable to those continuing to submit information as it is then an incomplete data set. This reinforces the notion that it should remain statutory in England, as it is for Wales, Scotland and Northern Ireland. A tiered approach to subscription could be a sensible solution, with costs based on institutional turnover to ensure smaller institutions are able to take part.

We hope this information is useful and would encourage HESA to get in touch if we can provide any other assistance.

Yours sincerely,



Iain Patton, CEO, EAUC