Sustainability Reporting Landscape for UK Higher Education Providers (HEPs)

Version	Notes	Date
1.2	Added IESG, added 'Tools' section, updated Wales & Scotland reporting requirements, updated framework comparison chart	24 09 17
1.1	Added UK R&I Concordat, updated TCFD description	24 08 07
1.0	Initial publication	24 07 19

V1.2 240917

Contents

Introduction

UK HEPs have many different stakeholders, and take their civic responsibilities very seriously. Through research, education, and community engagement, as well as through stewardship of large estates, universities are at the forefront of tackling the climate crisis.

As part of their efforts towards transparency and accountability for stakeholders, most HEPs across the UK report on a variety of sustainability-related activities and metrics. In addition, there are mandatory reporting requirements in some areas for HEPs in some countries of the UK (higher education is a devolved responsibility). By extension, for many HEPs (in England, specifically) there is little that is mandatory, and they are left to decide what they should monitor and measure, what they should report on, and where and when to report.

Regardless of legislative requirements, most providers are thorough in their monitoring and reporting of sustainability measures. Where mandatory guidance is absent, providers must navigate a broad range of frameworks that originate in, or are intended for, different countries, sectors and industries. They also look to the best-practice examples set by other providers, or to voluntary sector initiatives.

As the climate crisis becomes more acute, and as the new government beds in and begins to exert its own priorities, we expect the sustainability reporting requirements for the Higher Education sector to solidify. In the meantime, this document is an attempt to summarise the existing requirements that impact the sector, as well as those that the authors perceive may influence future policy and the shape of future regulation. The aim is to help H E providers understand and get ahead of any regulation, such that it is as easy as possible to implement it when it arrives.

The document takes the form of short summaries for each of the various requirements / initiatives, followed by a comparison table that attempts to classify the themes / metrics of each for easier assessment and analysis.

Please note that this does not include the requirements of the various league table compilers, which are numerous and change their metrics frequently. It is not exhaustive and, as a living document it will be updated in response to feedback and developments. If you spot any errors or wish to contribute, please contact Matt Sisson (matt@bufdg.ac.uk).

- MS 17 September '24

Frameworks

The summaries below are listed in a subjective way, according to their 'utility' – e.g. how mandatory they are and the size of the sector that they capture. Thus, the summaries at the end of this section are not at all mandatory – rather just a useful indication of the direction future policy may travel.

Biodiversity Net Gain (England)

Biodiversity Net Gain (BNG) legislation in England came into effect in February 2024. This impacts all developers and local authorities and creates a framework for the 'trading' of biodiversity 'units', and the mandatory requirement that each development sees at least a Biodiversity Net Gain of 10%. This can be achieved through either on-site improvements, off-site improvements (through trading 'units' with another development) or, as a last resort, through the purchasing of units from the government. Any profit made by the government is then to be reinvested in habitat creation.

https://www.gov.uk/government/collections/biodiversity-net-gain

Public Bodies Climate Change Reporting (Scotland)

Public bodies in Scotland, which includes all universities, are captured by legislation first published in 2009 (amended 2015, 2020), to mandatorily report on climate change measures, as part of the Scottish Governments plan to meet its 2045 net-zero target. The initiative is managed through the Sustainable Scotland Network (SSN), from which each bodies' reports are made available once

submitted. Responses from the FE and HE sector are analysed by EAUC.

https://sustainablescotlandnetwork.org/reports/guidance-reporting-guidance-2021-22

Various Welsh Reporting Requirements (Wales)

Reporting requirements for Welsh HEPs are extended by the Higher Education Funding Council for Wales (HEFCW) in its Accounts Direction to the sector (Para. 14), as well as from the Welsh Government through the Public Sector Net-Zero Reporting Guide, which is not mandatory but observed by most HEPs. These may be superceded by requirements from the new regulator for tertiary education, Medr, once it takes over in August 2024. The requirements include (but should not be limited to) a statement of, and progression towards, a net-zero target, with the recommendation to take guidance from SCEF (see below), TCFD (see below), and Welsh Government. More detailed reports are also made by all providers to the Welsh Government via its Energy Service, despite this also not being mandated in law. However, it is mandatory for Welsh providers to report emissions data to HESA via the Estates Management Record (EMR – see below).

https://www.gov.wales/sites/default/files/publications/2024-06/welsh-public-sector-net-zero-reporting-guide.pdf

Estates Management Record (EMR)

The EMR is a report (mandatory in Wales & Scotland / non-mandatory but well-observed in England) made to the Higher Education Statistics Agency (HESA) that returns, alongside more general data, detailed information on the condition and costs of university estates, including energy usage and carbon emissions, as well as water use and waste. The data are summarised in an annual report by AUDE.

https://www.hesa.ac.uk/collection/c22042

Task Force on Climate-related Financial Disclosure (TCFD)

In 2015 the Financial Services Board (FSB) set up TCFD to recommend how organisations should assess and report on their exposure to climate-related risks. The task force published its recommendations in 2017, and these were subsequently endorsed by the UK government, who have made TCFD disclosures mandatory for large private sector entities. HEPs classed as 'Public Interest Entities' (PIEs) are also included – to qualify they must have an operating income of over £500million. As of 2024 TCFD is now facilitated by the IFRS and are complementary standards.

https://www.gov.uk/government/publications/tcfd-aligned-disclosure-application-guidance/task-force-on-climate-related-financial-disclosure-tcfd-aligned-disclosure-application-guidance

Energy Savings Opportunity Scheme (ESOS)

ESOS is run by the Environment Agency and is a mandatory (for qualifying companies), four-yearly audit or organisational energy use covering buildings, industrial processes, and transport. Public sector organisations, as well as most universities, are generally exempt, although some providers in England and Wales may be captured depending on their self-declared status. The sector sustainability body EAUC has some guidance on whether a university may be eligible, but this is not definitive and, if a provider is unsure, legal advice may be required.

https://www.gov.uk/guidance/energy-savings-opportunity-scheme-esos#large-undertakings

Greenhouse Gas Protocol (GHG)

The GHG is the most well-used international measuring and reporting framework for greenhouse gas and associated emissions. The corporate reporting standard was first launched in 2001 and is updated on a regular basis. The GHG protocol forms the basis for many other reporting standards, including the sector's own SECR (see below).

https://ghgprotocol.org/about-us

Streamlined Energy and Carbon Reporting (SECR)

SECR is a 2018 UK government regulation (applying to England only) that requires corporations to report on Scope 1, 2, and 3 energy usage, based on the Greenhouse Gas protocol (GHG) corporate reporting

standard. The regulation does not apply to Higher Education providers, but there is specific advice relating to Further Education corporations, and which encourages the Higher Education sector to comply with its own variant, the HE Standardised Carbon Emissions Framework (SCEF – see below) produced in 2023, and managed by EAUC.

https://www.gov.uk/government/publications/college-corporation-financial-management-good-practice-guides/streamlined-energy-and-carbon-reporting-for-college-corporations

Sustainability Leadership Scorecard (SLS)

The SLS is a sector initiative developed by AUDE and EAUC, to provide a sustainability performance benchmark service for further and higher education providers. The SLS comprises 18 key measures across four areas: Leadership, Estates & Operations, Partnership & Engagement, and Learning, Teaching & Research. The service is made up of provider submissions, as well as data drawn automatically from the HESA estates / EMR record.

https://www.eauc.org.uk/sustainability_leadership_scorecard

ES Sustainability Concordat (ES Concordat)

The concordat is a joint initiative amongst the UK Research and Innovation (R&I) sector, and hosted by the Wellcome Trust, where signatories must ensure research is undertaken under an agreed set of sustainability guidelines. Amongst other things, the initiative

includes a focus on sustainability leadership, establishing new ways of collaborative working, and circular economy principles.

https://wellcome.org/what-we-do/our-work/environmental-sustainability-concordat

ISO 14060s

ISO 14060 is a family of internationally-defined standards for the quantification, monitoring, validation, and reporting of an organisation's greenhouse gas emissions and removals to support a low-carbon economy. It is a broad and complex standard that also includes more niche areas like corporate decision-making, and the involvement in GHG markets, such as the trading of GHG allowances and credits.

https://www.iso.org/search.html?PROD_isoorg_en%5Bquery%5D=14064

Department for Education (DfE) Climate Action Plans

The Department for Education mandates that all education organisations in England, including in Further and Higher education, produce a Climate Action Plan by 2025, including a nominated sustainability lead. As well as highlighting governance structures, plans should cover four areas; decarbonisation, adaptation/resilience, biodiversity, and climate education. DfE itself expects to enhance its sustainability-related regulation by this date, although these plans may be altered by a future government.

https://www.gov.uk/guidance/sustainability-leadership-and-climate-action-plans-in-education

Standardised Carbon Emissions Framework (SCEF)

The SCEF is a non-mandatory HE and FE sector framework, funded by a broad range of UK-wide bodies, and developed and managed for the sector by EAUC. Like SECR It is based on the GHG protocol, and HEPs can use it to calculate their carbon emissions in detail. It is entirely voluntary and does not replace any other existing requirements in any UK nation.

https://www.eauc.org.uk/scef

HM Treasury Sustainability Reporting Guidance

The Treasury requires all other central government departments to undertake sustainability reporting as part of the Greening Government Commitments (GGC), and in line with the government's Financial Reporting guidance (FReM). It takes a significant steer from TCFD (see above) requirements and, along with SECR, is clear, existing public-sector reporting that it is reasonable to assume will inform the basis for any future regulatory requirements for the HE sector.

https://assets.publishing.service.gov.uk/media/64b955f206f78d000d742645/2023-24_Sustainability_Reporting_Guidance.pdf

International Financial Reporting Standards (IFRS)

As of 2021, all financial accounts prepared by UK entities (including HEPs, through the sector's Statement of Recommended Practice (SORP)) are done so in accordance with IFRS. Financial accounts are designed to provide investors and stakeholders with an accurate picture of an organisations current and forecasted financial position and viability. The impacts of climate change and environmental breakdown can pose a risk to financial sustainability, and so should be considered as part of financial reporting frameworks. The most recent IFRS guidance and sustainability standards (S1 & S2) explain what universities (and all other entities) should consider and report on.

https://www.ifrs.org/content/dam/ifrs/supporting-implementation/documents/effects-of-climate-related-matters-on-financial-statements.pdf

Transition Plan Taskforce Disclosure Framework (TPT)

The TPT is a UK government initiative set up following COP26 to support its efforts to make Transition Plans mandatory for businesses. Transition Plans are a strategic document that explain how organisations will remain financially sustainable and thrive as the global economy transitions to net-zero. The TPT disclosure framework was published in 2023, and builds on IFRS (S1 and S2) and TCFD among other frameworks, and aims to be sector neutral.

https://transitiontaskforce.net/disclosure-framework/

Taskforce on Nature-Related Financial Disclosures (TNFD)

TCFD is a global initiative to produce a framework for how organisations monitor and report on their nature-related risks and opportunities. It has a broad range of global supporters, including the UK government. As the name also suggests, the framework adopts a similar approach to TCFD, covering Governance, Strategy, Risk/Impact Management, and Metrics.

https://tnfd.global/#what-is-the-TNFD

International Education Sustainability Group (IESG) Climate Action Barometer (CAB)

IESG is a partnership of internationally-operating universities across the globe (mainly UK/Europe and Australia/NZ), with a particular emphasis on climate and sustainability in international education. The CAB is a voluntary, intentionally low-cost/resource benchmark that tracks and compares the policies, practices, and emissions for international education over time.

https://www.iesg.eco/climate-action-barometer

Framework Comparison Chart

	Narrative						Metrics						
	Org. Strategy	Governance	Risk Management	Adaptation / Transition	Education / Engagement	Goals / Targets	GHG Scope 1	GHG Scope 2	GHG Scope 3	Biodiversity	Energy use	Water use	Waste
BNG						X				X			
PBCCR (Scotland)	X	X	X	X		X	X	X	X		X	X	X
HEFCW Accounts Direction (Wales)						X							
Welsh Gov. reporting							X	X	X		X		X
EMR							X	X	X		X	X	X
TCFD	X	X	X			X	X	X					
ESOS						X					X		
GHG Protocol							X	X	X		X		
SECR							X	X			X		
SLS		X	X	X	X	X	X	X	X	X	X	X	X
UK R&I Concordat	X				X		X	X	X	X	X	X	X
ISO 14060	X	X	X			X	X	X	X		X		
DfE Climate Action Plans	X	X			X	X	X	X					
SCEF							X	X	X		X	X	X
HM Treasury Guidance	X		X	X		X	X	X	X	X		X	X
IFRS	X		X										
TPT	X	X	X	X	X	X	X	X	X				
TNFD	X	X	X			X				X			
IESG Climate Action Barometer (CAB)	X				X	X				X			

Tools

The summaries below highlight some of the sustainability / climate-related tools at use in the sector. Some of these are the result of sector projects, others are initiated within institutions, before being shared more widely. None of these are compulsory across HE in any UK nations.

Commuting Survey Guide and Tool (2024)

Funded by the Scottish Funding Council, this EAUC resource pack aims to create a standard baseline for post-16 education sector organisations to report on their staff and student commuting emissions. The pack follows on from the Business Travel Guide for the Further and Higher Education Sector and The Domestic and International Student Relocation Travel Emissions Calculator Tool (see below). Whilst developed by EAUC Scotland, it is relevant to UK and Ireland organisations.

https://www.eauc.org.uk/commuting_survey_guide_and_tool

EAUC Scotland Business Travel Guide (2023)

Launched in 2023, the guide highlights the Scottish policy and social drivers for addressing business travel emissions, showcases best practice in strategies, reporting and reduction activities, and signposts to additional resources. Most of the guide will also be applicable to non-Scottish institutions.

https://www.eauc.org.uk/business_travel_guide

Domestic and International Student Relocation Travel Emissions Calculator Tool

Developed by the University of Aberdeen, the tool provides UK FHE institutions with a user-friendly, prepopulated framework for reporting scope 3 domestic and international student travel at the start and end of the academic year. It aligns with the SCEF (see above) and the PBCCR (Scotland), and helps institutions fulfil the principles of emissions reporting under the GHG protocol.

https://www.eauc.org.uk/the_domestic_and_international_student_relocati

Cost of Net Zero Calculator

Launched by AUDE, BUFDG, and EAUC in July 2023, this tool was published alongside the Cost of Net Zero report to help tertiary education institutions understand the financial impact of net zero goals. The calculator was designed to, among other things, help establish early-stage cost estimations for a proposed transition to net zero, and the scale of investment required, to assist with financial planning. This tool is not intended to inform detailed business plans.

https://www.bufdg.ac.uk/knowledge-hub/sustainability-and-esg/

Imperial 2040 Net Zero Calculator (I-C-Calc)

Imperial College London's "I-C-Calc" 2040 Net Zero calculator is an institutional level tool that has been developed by an academic team to help identify optimal and feasible net zero decarbonisation pathways and targets. It is based on the International 2050 Calculator methodology and enables the institution to identify emissions hotspots and the full range of possible technological and behavioural interventions, along with a scheduling capability to prioritise the timing of those interventions.

The model encompasses GHG emissions across Scopes 1, 2 & 3 at an institutional level and enables data input from 2018 to 2023 for over 350 operational 'levers' across five categories (population, buildings energy demand, buildings energy supply, travel, and procurement). This tool does not calculate the costs of any interventions. Imperial has developed the calculator with principles of openness, collaboration, simplicity and transparency, and the long-term aim is to make the tool adaptable to other organisations with different characteristics.

https://2050calculator.net/I-C-Calc-demo/xls-web-direct/IC-C-Calc.html