House of Commons
Environmental Audit Committee


Tenth Special Report of Session 2014–15

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Environmental Audit Committee

The Environmental Audit Committee is appointed by the House of Commons to consider to what extent the policies and programmes of government departments and non-departmental public bodies contribute to environmental protection and sustainable development; to audit their performance against such targets as may be set for them by Her Majesty's Ministers; and to report thereon to the House.

All publications of the Committee (including press notices) and further details can be found on the Committee’s web pages at www.parliament.uk/eacom

Membership at the time of the report

Joan Walley MP (Labour, Stoke-on-Trent North) (Chair)
Peter Aldous MP (Conservative, Waveney)
Neil Carmichael MP (Conservative, Stroud)
Martin Caton MP (Labour, Gower)
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Simon Wright MP (Liberal Democrat, Norwich South)
Tenth Special Report

The Environmental Audit Committee reported to the House on 12 September 2014 on *Sustainability on the Home Office* (HC 222). The Government response to the Committee’s Report was received on 21 November 2014 and is appended below.

Government response

We have considered carefully the report and our response to the Report’s ten recommendations are below.

The Home Office undertakes policies and programmes with a range of social and environmental impacts, and directs staff to follow guidance on considering sustainability as part of policy appraisal and impact assessment. It should ensure that sufficient time and resources, including high quality internal challenge and review, are spent on more complex cases to ensure the full range of impacts are assessed and incorporated into the design of policies. (Paragraph 6)

Home Office policies aim to fulfil the Department’s objectives; to cut crime, reduce immigration and prevent terrorism, whilst contributing to the Government’s growth agenda. The Department endeavours to ensure these objectives are achieved on a sustainable footing.

To ensure consistency in consideration of the potential impacts of Home Office policy, appraisal is guided by the Cabinet Office’s Impact Assessment Toolkit, and in conjunction with HM Treasury’s Green Book guidance. The Green Book guidance relating to the ‘social and economic costs of crime’ for the purpose of policy appraisal is currently under review. The results of the research into the carbon costs of crime will be considered for integration into this guidance in order to ensure that future valuation of crime is more sustainable. Internal challenge and review for more complex cases is provided by a Chief Economist Statement, designed to provide scrutiny of the impact assessment, independently of those involved with development of the policy. Consideration of social, environmental and economic impacts is part of this process.

In addition, the Home Office is developing a Sustainable Development Awareness Programme, which will include guidance on sustainability for internal use by officials involved in policy development, and learning and development sessions aimed at enhancing understanding of sustainability in the context of Home Office policies.

The Home Office will continue to work closely with the Department for Environment, Food and Rural Affairs (Defra) to improve the Department’s approach to assessing sustainable development impacts.
Long-term action is needed to tackle wildlife crime, and it is important that the Government sets out a vision for the Wildlife Crime Unit with long-term funding maintained and at least increased with inflation. (Paragraph 13)

Combined, the Home Office and Defra have committed an additional £544,000 of specific funding over the current spending review period to support the Unit’s work. We are not able to pre-empt the outcome of the next spending review, or Ministers’ funding priorities after 2015–16.

The specific funding for the National Wildlife Crime Unit is in addition to the funding that central government provides to the police in England and Wales to tackle all types of crime—in 2014–15 that will be £8.5 billion. In addition, the police receive around a quarter of their total funding from the police precept component of council tax. In order for Police and Crime Commissioners to ensure that police force priorities across England and Wales reflect those of the communities they serve, it is important that individual police forces have the flexibility to deploy their resources, including those on wildlife crime, without interference from central government.

The Government should keep wildlife crime sentencing under review and be ready to facilitate clear guidance for the judiciary to ensure that wildlife crime is punished with appropriately strong penalties. (Paragraph 15)

As the Government stated in its response to the Environmental Audit Committee’s 2012 report on wildlife crime, sentences given are a matter solely for the courts, which are independent from Government. It is the responsibility of Government and Parliament to provide a sentencing framework which gives the courts sufficient powers to deal with the range of offences and offenders which come before them. Within that framework, it is for judges and magistrates to decide the appropriate sentence on a case by case basis, taking account of the harm the offence caused and the culpability of the offender.

We welcome the steps that the Government has taken around data coding to ensure wildlife crime is a separate statistic. However, a more detailed publicly available database would provide greater transparency. Once the Government has received the Law Commission’s report on modernising wildlife law, it should work with stakeholders to design a clearer and more comprehensive system of recording and reporting. (Paragraph 18)

The Government agrees that the current body of legislation relating to wildlife crime could be modernised and simplified, which is why it has asked the Law Commission to consider the scope for reform and consolidation of wildlife law as part of its 11th programme of law reform.

The Government does not want to prejudice the outcome of the Law Commission’s work, and will therefore consider the treatment of wildlife crime offences in light of the Law Commission’s final report at the end of the year.

The Home Office is making good progress towards achieving the Greening Government Commitment (GGC) targets. However, it needs to maintain progress and improve its performance on emissions from travel. Going forward, it should work with Defra and the Cabinet Office to prepare itself for future targets. These should include
indirect, or ‘scope 3’, emissions and targets on a ‘per unit’ basis to more accurately measure the overall efficiency of departments’ operations. (Paragraph 26)

The Home Office welcomes the Report’s conclusion.

Although travel emissions have increased by 9% on baseline, they are slightly down on last year. The majority of our emissions arise from road travel (mixture of fleet, grey fleet and hire cars) and includes our substantial operational fleet.

Following the conclusion of the GGC scheme in 2015, the Department will play its part in contributing to the achievement of any new sustainability targets set by Government.

In line with good practice, Defra is commissioning research to evaluate the GGC framework to provide evidence of its policy effectiveness and to inform the development of future targets. The contributions of stakeholders across government, including Home Office and other departments in scope for the GGCs will be valuable to ensure the evaluation provides a reliable evidence base for the future. It will be for the Government of the day to determine its approach to future targets for government’s estate, operations and procurement.

The Home Office CAESER tool provides a useful way of engaging suppliers on their sustainability. The Government should incorporate the full version of the CAESER tool within its sustainable procurement portal, to ensure that all major Government suppliers complete it. However, the CAESER tool is not sufficient on its own to ensure suppliers comply with sustainable procurement standards. The Home Office needs to introduce a robust process for ensuring all contracts include sustainability criteria and performance indicators and the delivery of commitments is actively managed. The Home Office should ensure that the sustainability indicators for the COMPASS asylum accommodation contracts are agreed as soon as possible. (Paragraph 34)

The Government is committed to ensuring that environmental and social costs and impacts are taken into account in its procurement policy and practice, and to demonstrate how sustainable public procurement can deliver efficiencies and innovation. The 4th GGC sets out an obligation to buy sustainable products using Government Buying Standards (GBS) and requires all central government departments to take steps toward monitoring and managing the impacts of their supply chains. Departmental progress in both areas is subject to scrutiny by the GGC Sub-Committee and annual progress reports are made publicly available.

The Government does not however mandate the tools and processes that government procurers should use, as there are a number of products on the market and requiring the use of a particular one could stifle competition. Defra works closely with Cabinet Office and the Crown Commercial Service (CCS) to ensure that sustainability is seen as integral to good procurement and is embedded in the framework contracts it develops. In addition, through the CCS, a system for the top 500 suppliers to report on their carbon emissions and other environmental impacts, namely waste and water has been introduced. They are able to do this through logging this information on the sid4gov supplier information database. The intention is that this data is used by departments to identify hot spots in terms of supply chain impacts and enable further action in partnership with suppliers and other buyers to drive down impacts and costs. Defra and Cabinet Office have also worked
with those departments who have opted to use the commercially available CAESER tool, to help share their learning with other government departments.

The Home Office has promoted CAESER to other government departments to support sophisticated supply chain reporting, as part of best practice at cross Government Sustainable Procurement Forums. The Home Office is also seen as a leader of supply chain reporting by Cabinet Office and Defra and are happy to engage with departments to improve sustainable procurement standards.

The Home Office Standard Terms & Conditions do include Corporate Social Responsibility (CSR) clauses, for example:

‘The Contractor shall perform its obligations under the Contract in accordance with the Authority’s environmental policy, which includes requirements to conserve energy, water, wood, paper and other resources, reduce waste and phase out the use of ozone depleting substances and minimise the release of greenhouse gases, volatile organic compounds and other substances damaging to health and the environment.’

The Home Office will publicise a CSR procurement Guide for their internal commercial community. The purpose is to provide commercial and contract managers with some useful pointers for including sustainability throughout the procurement process and lifecycle of the contract. Guidance will include information on planning, specification, suggested KPIs and contract management. Evaluation criteria examples are also provided.

The Home Office has reviewed the recommendations highlighted from the NAO audit and are developing a Business Intelligence tool. This tool will capture KPI progress (will include a CSR KPI), contract details and strategic & operational supplier monthly reports. These KPIs will be monitored by the supplier relationship management team and actioned by contract managers.

Monitoring of the consumption of natural gas, other fuels (bottled gas, oil and diesel), electricity and water along with monitoring waste and recycling and company owned vehicle usage has been implemented for the COMPASS asylum accommodation contracts. Work is underway to set and agree sustainability indicators.

The Home Office should set minimum contractual standards and work with other Government Departments such as DECC to encourage landlords of asylum accommodation to invest in energy efficiency improvements. (Paragraph 35)

The Home Office continues to engage with suppliers over sustainability issues. It is noted that emissions attributable to asylum accommodation are not currently within the scope of the GGCs; however, clauses within the contract do support a supplier’s requirement to address such issues. The Home Office continues to engage with suppliers to save money, particularly through the Executive Oversight Boards that meet with each major supplier and, for example, G4S are in the process of switching to corporate tariffs to include their whole portfolio and are trialling tamper-proof boiler and timer controls.
The Home Office should review police procurement spend to introduce new areas for sustainability standards which could be covered by national procurement frameworks. It should also actively explore ways that its procurement can promote wider social impacts. (Paragraph 36)

Procurement decisions are the responsibility of individual PCCs and police forces. However, the Home Office encourages police forces to utilise CCS frameworks wherever practicable. CCS is committed to sustainable procurement, and the GGCs, and has taken steps to embed the GBS into its procurement activity. Where CCS frameworks are not a possibility, forces are encouraged to use other collaborative frameworks and options. They should ensure that sustainability and social values are achieved as part of their gateway decision process.

In addition, the National Police Estates Group (NPEG) Environment Team (of which Home Office are active members) has launched a Police ECO Handbook and National Environment Charter for all forces to adopt. This is supported by the National Policing Lead for Estates and Sustainability, promoting environmental best practice.

The Home Office is considering how it can promote wider social impacts throughout the procurement process. The CSR Procurement Guide, currently in draft format, will include equality and diversity and social considerations for procurers.

The role of a senior-level ‘Sustainability Champion’ is important for embedding sustainability and giving organisational leadership and all departments should have one. Whilst the ‘Champion’ does not need to be a sustainability specialist, it is important that they have a good knowledge and practical experience of the issues involved. (Paragraph 40)

The Department believes that its Sustainability Champion possesses the appropriate experience, responsibility and seniority to undertake the role effectively.

As indicated in the Government’s response to the Committee’s report on Sustainability in BIS, arrangements for the governance of mainstreaming sustainable development will differ by department. Each department is responsible for its own sustainable development performance and for determining an approach that suits its individual culture, circumstances and needs. While the Cross Whitehall Sustainable Development Group provides a forum for sharing different approaches to governance, it remains for individual departments to consider whether they wish to make any amendments to their existing approach.

It is important that high-quality training material is available to support staff in considering sustainability. This new training course appears to be a useful resource, and the Home Office should ensure that all staff with sustainability in their job descriptions should undertake this role. Additionally, we would like to see all new Civil Service staff undertaking this training, as part of their induction. (Paragraph 42)

The new ‘Introduction to Sustainable Development’ e-learning course was launched on the Civil Service Learning website in May and has been promoted via the Cross Whitehall Sustainable Development Group. While the course is available to all civil servants, it is for individual departments and line managers to determine the learning and development
priorities for their new staff. However, we will use the cross Whitehall group to encourage departments to consider including the course in induction programmes for new entrants. The Home Office is ensuring that all staff with sustainability in their job descriptions undertake this course.