

## **Sustainability and Climate Change: A draft strategy for the education and children's services systems**

### **Response of the Association of School and College Leaders**

#### **A. Introduction**

1. The Association of School and College Leaders (ASCL) represents over 21,000 education system leaders, heads, principals, deputies, vice-principals, assistant heads, business managers and other senior staff of state-funded and independent schools and colleges throughout the UK. ASCL members are responsible for the education of more than four million young people in more than 90 per cent of the secondary and tertiary phases, and in an increasing proportion of the primary phase. This places the association in a strong position to consider this issue from the viewpoint of the leaders of schools and colleges of all types.
2. ASCL welcomes the opportunity to contribute to the development of this draft strategy.
3. We have structured this response to align with the five action areas in the draft strategy: climate education; green skills and careers; the education estate; operations and supply chains; and data. We understand that the Department for Education may be considering broadening the scope of the strategy, adding digital infrastructure to the education estate, adding standards to data, and adding a sixth action area focused on international issues. We look forward to commenting on that broader scope as appropriate.

#### **B. Key points**

4. The government must provide adequate funding to address the climate emergency. There must be a coherent and well-planned response across all parts of national and local government to make immediate and sustained change. There is welcome progress on which to build, including the net zero carbon commitment, the recent establishment of a dedicated DfE sustainability unit, a draft strategy for education, and new DfE working groups linked to each of the strategy action areas.
5. However, it is unclear yet to what extent this activity will lead to sustained and impactful change. The strategy itself is welcome, but includes little detail or specific research-based targets. The 'big ticket' items in the strategy – the climate leaders award and national education nature park – are admirable and educationally interesting, but are unlikely to shift behavioural change and structural issues at the required pace. Perhaps too much emphasis is being placed on longer-term future resilience as opposed to preventative action.
6. The government must provide sufficient capital funding. The education sector and many individual education settings will not meet the carbon net zero in operation target unless sufficient capital funding, along with reliable advice and guidance, is provided to every education setting. There is an enormous gap between the condition and age of some of the education estate and the capital funding that is available.

7. The Department for Education's May 2021 Condition of School Buildings Survey (based on data from 2017 – 2019) found that it would cost £11.4 billion to repair or replace all defective elements in the school estate. The highest need area is electrics (needing £2.5 billion), followed by items such as boilers and pipework, and then external walls, windows, doors, and roofs (needing £1.5 billion). It is completely unacceptable that children, young people, and staff are working in learning environments that are not of a satisfactory condition, and not a conducive environment for education. Schools and colleges face considerable ongoing costs for routine maintenance, before even being able to think about sustainable long-term improvements.
8. Any new or revised policy requirements which will incur material capital expenditure must be fully funded and not come from existing school budgets. This includes covering the cost of infrastructure changes, upgrades and replacement.
9. ASCL would like to see the Department for Education model costs and examples, so that the sector knows where to start with this work.
10. Overall, ASCL members are very supportive of the draft strategy. Many have already embedded climate change, sustainability, and related topics into their curriculum, and have taught these issues for some time. Many members of staff, and particularly children and young people, are engaging in activities and award programmes which support sustainability and climate change, such as eco councils, donation points, energy management, water efficiency, recycling schemes, swap shops and community gardens/projects. Many schools and colleges also embed diverse experiences into their curriculum, such as trips and visits, to ensure children and young people, particularly those from disadvantaged backgrounds, experience local, regional, and national biodiversity.
11. ASCL welcomes the inclusion of all parts of the education system in the draft strategy, from private nurseries to further and higher education institutions. Our members in all sectors, and in both state and independent schools, see significant potential for co-operation and partnership within and across sectors, and plan to take this forward when we have more detail of the proposals.
12. We would encourage the government to consider not only national perspectives and learning on climate change and sustainability, but also to include and learn from international experts, practice, and projects already in train.

## **C. Feedback on the specific strategy action areas**

### **Action area 1: Climate education**

13. ASCL supports the approach of including sustainability and climate change across all stages of education, making it accessible and relevant at each stage.
14. We also support an increased focus on climate change and sustainability in the primary science curriculum. However, our view is that this should be done through updates to the National Curriculum rather than through the provision of a primary science model curriculum. We are concerned that the recent proliferation of model curricula risks creating confusion about what is and isn't statutory in curriculum design and delivery.
15. Alongside this, we would welcome the provision of non-statutory guidance for teachers and leaders on green knowledge and skills.

16. We would also encourage the inclusion of these skills in the ITT framework, to ensure teachers coming into the education system have the necessary skills and knowledge of this crucial area.
17. Specialist schools and alternative provision settings would like to see curriculum resources and materials developed that are inclusive for all children and young people to learn about sustainability, climate change and biodiversity.
18. We would like to better understand the DfE's thinking on ways of identifying champions to provide leadership and co-ordination of climate change and sustainability activity, as many school leaders are doing this already via school development/improvement plans, supported by pupil-led activities. One way of formalising this might be to replicate the approach taken with mental health leads. Given that this could be a transformative role, to ensure all education settings have the resources to deliver this it is essential that funding for any initiatives is directly distributed to schools.
19. We are interested in the potential for the climate leaders award to structure the development of green skills and knowledge of climate change and sustainability, from early years through to higher education. This could include the development of a 'digital passport' of knowledge, experiences and skills, which children and young people could achieve through credits attained for class-based learning, home-based activities, volunteering, extra-curricular activities, activities with green organisations and involvement in existing programmes such as The John Muir Award, Duke of Edinburgh Award, Eco Schools Award, etc. This is an exciting concept, but significant work would be required to develop the necessary infrastructure and qualifications.
20. Overall, ASCL members feel relatively confident in developing a curriculum with increased focus on climate change and sustainability. They have more concerns about other areas of the strategy, including securing funding for site improvements, infrastructure upgrades, unachievable accountability targets and where to find reliable advice and support.

## **Action area 2: Green skills and careers**

21. The timelines for changes to the green skills and careers strategies may need to be reviewed, particularly considering the time it will take to update and change frameworks, training materials and course criteria.
22. Green skills qualifications should be more readily available and more widely validated. Work placements which support the student experience should also be more widely available and there needs to be upskilling of existing staff in these areas of the curriculum before there is sufficient capacity to deliver green skills more widely. In addition, there need to be more apprenticeships at all levels in green skills so that employers can develop their products as well as their workforce.
23. There are two routes to consider: general education delivered to all children and young people, and technical expertise linked to specific jobs, roles, industries and career pathways. Consideration should be given to including appropriate references to climate change and sustainability across a wide range of existing qualifications, looking at where green skills could be built in not added on, ASCL does not see this an either/or scenario.

### Action area 3: The education estate

24. ASCL believes that the funding available through devolved formula capital allocations is insufficient to meet the intended function, and that the current distribution methodology does not accurately reflect condition. The lack of coherence between different strands of schools' capital also represents a barrier to keeping some schools in a condition deemed fit for purpose. For example, the DFC allocation may be significantly below the minimum threshold for applying for condition improvement funding (CIF).
25. The 2017 National Audit Office report [Capital Funding for Schools](#) (based on data from 2012- 2014) stated that deterioration of the school estate is a significant risk to long-term value for money. This report estimated that it would cost £6.7 billion to return all school buildings to satisfactory or better conditions, with a further £7.1 billion needed to bring parts of school buildings from satisfactory to good condition. At the time of the report, Sir Amyas Morse, head of the National Audit Office, advised that the Department for Education "must make best use of the capital funding it has available – by continuing to increase the use of data to inform its funding decisions and by creating places where it can demonstrate that they will have the greatest impact".
26. The Department for Education's [May 2021 Condition of School Buildings Survey](#) (based on data from 2017 – 2019) found that it would cost £11.4 billion to repair or replace all defective elements in the school estate. The highest need area is electrics (needing £2.5 billion), followed by items such as boilers and pipework, and then external walls, windows, doors, and roofs (needing £1.5 billion). It is completely unacceptable that children, young people and staff are working in learning environments that are not of a satisfactory condition. This means that many children and staff are learning and working in buildings which are not a conducive environment for education, and that schools face considerable ongoing costs for routine maintenance.
27. These two reports suggest a growth in need in the school estate over the period of the two data collection programmes.
28. Circa 60% of the school estate was built pre-1976. Many schools will have had multiple small and large retrofits and will not have been built to modern building standards and guidelines. There will be variation in lighting systems, window types and ventilation systems.
29. There are three key elements that ASCL members would like to see with regard to buildings and safety. Firstly, equality and equity of provision wherever schools and colleges are located in the UK and whatever the context of their site(s). Secondly, sufficient funding to implement appropriate safety measures to keep, pupils, staff, and resources safe. Thirdly, clear guidance on the requirements on school and college leaders.
30. One of our members' key concerns is the presence of asbestos in many older school buildings. The government's solution to this problem has been to provide guidance on how to safely manage the presence of these materials. However, ASCL members do not think this is good enough and it is our view that the government should remove this risk entirely through the phased removal of asbestos from all school and college buildings.
31. Consideration should be given to whether sites identified for new or re-built schools and colleges remain fit for purpose, including monitoring of air quality and environmental impact studies. It is unacceptable that new schools have recently been built in areas of

very poor air quality, with high levels of pollution, and are not able to have opening windows as a result. With natural air ventilation cited as key recommendation of good practice in ventilation by the Department for Education and the Health and Safety Executive (HSE), it would seem sensible to locate education provision in areas with good air quality and to provide supporting infrastructure, such as transport links, which would also support energy efficiency and minimise the environmental impact.

32. Any new or revised policy requirements which will incur material capital expenditure must be fully funded and not come from existing school budgets.
33. The Climate Action Plan requirements are vague, but appear to be a key part of the strategy, as we assume they will include a broad range of factors such as energy consumption, water efficiency and thermal efficiency. We have several questions we would ask the DfE on this part of the strategy:
  - Does the DfE see the Climate Action Plan as being the next step on from the existing Streamlined Energy & Carbon Reporting (SECR), under which some academies are required to report?
  - Will it be a legal requirement to have a Climate Action Plan in the future?
  - How will they be monitored? Will they be for internal use within education settings, or another reporting requirement to central government?
  - Will the DfE or an approved partner provide a template and guidance which considers the diverse nature of the school estate?
  - How much of the plans could be pre-populated or automated?

#### **Action area 4: Operations and supply chains**

34. One of ASCL members' key concerns is that specialist and technical expertise comes at a cost. Leaders are keen to be supported with procurement guidance and information on 'trusted' suppliers who understand the education context and the complexities of various building, site and infrastructure designs.
35. Special schools and alternative provision settings would like to see the development of support, advice, and guidance specific to their context, which would help them to address issues of particular relevance to them. This includes specialist buildings, equipment, and products and services such as sensory rooms, hydro pools, transport and adaptive technology.
36. The operations element of the strategy includes a number of proposals focused on food usage and disposal, including waste data, guidance on reduction, review of food standards and composting. Again, a number of these initiatives are already in place in most education settings. A key question we have on this strand of the strategy is how it will align with the School Food Review and complement any policy changes moving forward. How agile will this strategy be, in order to keep pace with policy changes in other government departments?

#### **Action area 5: Data**

37. ASCL is concerned that data collection and analysis may become another onerous workload pressure for school and colleges leaders, and potentially used as another accountability measure. However, it is difficult to make a judgement on this without having more detail on the broad proposals in the strategy document.
38. An aspirational national or international accredited quality mark which recognises improvement may be a better solution than a more punitive rating framework driven by

compliance. For example, within the restaurant industry, a Michelin star award is desired, whereas a good food hygiene rating is a basic requirement. As with the climate leaders award, we could see the benefits of an accreditation system which is aspirational and drives improvement and innovation.

39. ASCL's [Blueprint for a Fairer Education System](#) sets out a number of changes we would like to see in the way in which schools and colleges are held to account. This includes, the introduction of an 'accountability dashboard' or 'balanced scorecard' as the key accountability mechanism for all schools and groups of schools. ASCL believes there needs to be a more comprehensive way of determining nationally recognised measures, rather than piecemeal additions linked to different parts of policy or regulation. These measures should also reflect what we, both nationally and individual schools and colleges, believe children and young people most need in order to recover from the impact of the pandemic. Any additional accountability measures introduced as part of this strategy should, therefore, form a coherent part of an overall approach to school and college accountability.
40. The DfE and other parts of government already hold significant amounts of data collected from education settings and other sources, such as the Condition Data Collection (CDC) and Streamlined Energy & Carbon Reporting (SECR). Before the DfE introduces new targets and measures, it needs to understand what information schools and colleges have and whether it is possible to collect comparable data. The DfE also needs to appreciate that the existing level of knowledge and expertise in individual schools will vary. ASCL would encourage the government to undertake a root and branch audit of the existing data it collects and holds, before requesting additional information and potentially creating unnecessary workload.
41. More broadly, there already exists significant amounts of data and research on green technologies and solutions, with proven impact and return on investment. It is important that this is widely shared and understood, to ensure we can move as swiftly as possible to implement solutions, rather than waste time gathering data which already exists.
42. ASCL suggests that DfE undertakes a workload impact assessment on the strategy proposals before deciding to implement additional requirements, particularly where these could be linked to a statutory requirement or an accountability measure. We would be very happy to be part of further conversations on this, particularly as there appears to be limited representation from schools and colleges in the DfE data working group.

## **D. Conclusion**

43. We hope that this response is of value to your review of the draft strategy. ASCL is willing to be further consulted and to assist in any way that it can.

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