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Dear Dr Mori,

Please find below our consultation response on the QAA and Advance HE ESD guidance.

The response is on behalf of the Members of the EAUC – The Alliance for Sustainability Leadership in Education

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 £43 billion, responsible for educating over 4.5 million students supported by over half a million 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

EAUC's summarised response to the consultation:

We welcome this update to the ESD guidance for Higher Education. There has been a lot of change since the 2014 ESD guidance was first published, with the UK Government declaring a climate emergency in 2019, the new net zero legislation amends, and the necessity and opportunity for a green recovery from the global pandemic.

Young people are facing a future that looks entirely different to that which has gone before them, and this must be reflected in their education. It is the job of the education sector to make sure its young people are future-fit. Education for Sustainable Development and the competencies and skills on which it rests are the key to achieving this.

We like the way the guidance is set out. There is a good explanation of what ESD is and why is it important, followed by some useful suggestions on how to embed ESD for varying audiences, and thought-provoking questions in the toolkit, all concluded with a large bank of helpful resources. We also think it is sensible that the guidance is not prescriptive as this allows institutions to tailor their approach.

We have a few thoughts on each section which we will go into more detail about below.

However, we have some initial concerns and will go over the largest of them below.

1. First and foremost, there is a fairly fundamental issue with the guidance, which we would encourage QAA to address. There is clear emphasis of the importance of ESD and the issues it addresses ('key issues that pose existential threats to humanity and require wider and urgent attention in our curricula'), and yet, this guidance only 'complements' the UK Quality Code for Higher Education and 'does not form an explicit part of it and is not part of the regulatory environment'. This is an issue that must be remedied, by QAA and also more widely by OfS, and other regulatory bodies. ESD must be mandatory, for all of the reasons this very guidance outlines. Additionally, members were concerned that the tone of the guidance was not strong enough to reflect the urgency of the situation, nor was it inspiring or passionate. Members suggested there needs to be a clear call to action with no room for excuses given the existential threats sustainable development aims to tackle, not to mention the economic costs of failing to achieve a low-carbon economy.

2. The next overarching issues is that, while the Development Group that worked on this are undoubtedly sustainability experts, this is an academic-heavy endeavour, with little involvement of students, employers or those that deliver teaching outside of environmental roles. This is problematic and reflected in some of the content and language. There is a need for simplification, to ensure this is guidance that can be used by all, as it is intended as 'practical help'. There is also need for students specifically to be consulted – there is a recognition that ESD within the curriculum is very much wanted by students, it is for their benefit, and they are a key stakeholder when it comes to the embedding of ESD, but they are missing in this conversation.

3. There is also a lack of recognition that delivery of ESD within the curriculum, delivered by current lecturers, embedded across all subjects, will require more teaching staff to have

training and skills provision to enable this. The content of ESD, particularly the knowledge element, as has clearly been outlined, has been lacking in most courses – therefore teaching staff must be upskilled before they are able to provide this information to students. It would be unrealistic and unfair to ask them to do this without the necessary training. While this may not perhaps fall fully under the remit of this guidance, certainly it should be recognised.

4. The SDGs are suggested as the framework for ESD within the ESD guidance, and while we support the SDGs and think they form a good framework for sustainability generally, there was some discussion within our membership as to whether they are the right framework for ESD. However, members conceded that the guidelines do not mandate the use of the SDGs, therefore it is fair to suggest them as a framework. Though there could be a little more bridging information about the SDGs and how they would be used as a framework in this context.

5. This guidance outlines the core competencies involved in ESD brilliantly, but it is our belief that ESD represents a combination of skills/competencies AND knowledge. The knowledge element within this guidance is a little overlooked and could be highlighted more effectively in perhaps section 1 or 2. Students across all disciplines must have ESD skills, but they also need carbon literacy, and other knowledge about global issues that will impact their subject, potential job roles, and lives.

EAUC detailed response to the consultation questions:

1. If ESD is not already designed into your curriculum, does the guidance encourage you to do so?

Yes.

Members unanimously indicated that it did (if it was applicable to them).

2. Does *Section 1 ('Education for Sustainable Development: What is it and why is it important?')* provide readers with the information needed to gain an understanding of ESD and convey its importance?

The majority of members indicated that yes, section 1 does provide readers with the information needed to gain an understanding of ESD and convey its importance.

Additional feedback: The information in section 1 is useful, and a sustainability professional or academic in an environmental field would say it was clear and succinct. However, if this is to have a wider appeal and use within an education setting, the language needs to be more universal. It is currently very academic and contains a lot of subject-specific terminology and phrases. There is scope for some of the language to be simplified to appeal to a wider group of people.

The importance of ESD is conveyed well within this section, but there is some emphasis missing that highlights why it is so important that education institutions specifically deliver ESD within the curriculum. It needs to more clearly discuss an institutions role in making sure students are future

fit and their responsibility as bastions of learning to deliver key skills and education on a topic that will affect their students' lives.

There is a lack of UK context which seems a little remiss as well. The UK Government declared a climate emergency in 2019, it amended legislation on the UK's Net Zero target, there will shortly be interim targets, and there is a huge raft of regulation and legislation in the works to make sure the UK quickly transitions to a low carbon society. Not to mention the focus on a green recovery from the pandemic – which is the elephant in the room in this document. This is not just about the education sector doing what is right by their students, it is also about forward planning, and delivering education that they will very likely be required by regulatory bodies in the not too distant future. The pandemic could additionally be used to show how ESD provides adaptation and resilience skills, and the benefits these bring in both the context of learning, as well as all job roles.

As mentioned in the summary, some members raised concerns about the SDGs being suggested as a framework for ESD. If we look at this document from the perspective of someone outside of the sustainability sector, that has not got much prior knowledge of the SDGs, it is difficult to see HOW the SDGs can be used as a framework for ESD. Perhaps a visual representation of this might help? The targets of the SDGs are specifically aimed at nation states, and we have experienced quite a lot of staff that struggle to use the SDGs as a framework, as they essentially need to be translated for institutional use. There is a lack of suggested resources for the SDGs, with only one in the resource list that is about the SDGs, and none that outline more detail on the SDGs in the context of ESD. Without more support available, it will be difficult for institutions to use the SDGs as a framework, but we agree this is probably the most sensible framework to use, so perhaps there is scope for more work here to interlink the two. Members also suggested the possibility of including case studies that show the interlinkages between SDGs and ESD more clearly. There was also concern about basing ESD on the SDGs, regarding what would happen after 2030 when the SDGs should have been reached.

Members suggested that there needs to be a stronger emphasis on the need for a whole institution approach to ESD, and while this point is made further on in the document, it should be in the very first section as well.

Members felt that the Brundtland definition of Sustainable Development is outdated and the definition of Sustainable Development has broadened since then.

3.   Does *Section 2 ('Designing education for sustainable development')* provide you with the information you need to position sustainability within your curriculum?

Member responses here were mixed, with around half saying section 2 does provide them with the information they need to position sustainability within the curriculum, and half saying it did not.

Additional feedback: Section 2 is a good overview of the core competencies of ESD, but we are not sure there is a strong enough link with the subject- knowledge side of ESD. In essence, ESD has two parts; competencies (skills) and knowledge (the framework) – that could be made clearer. This section is also written in a fairly complicated way at points, as previously mentioned. This continues to cause some accessibility issues.

Within section 2, there is some language that frames SD and its benefit to students in a slightly odd and slightly condescending way. One paragraph states 'The most significant impact SD will have is on the behaviour of graduates and how they live, learn and work. The competencies - the skills, attributes and values - they develop through their studies can help graduates contribute to a more sustainable future, transforming their thinking so that they have a positive impact throughout their lives.' It was felt this should say ESD rather than SD. The way this section is phrased makes it sound a little like we are creating a generation to fix things, rather than this being an intergenerational issue, and lacks explanation of how this is beneficial to students themselves. We would suggest this could be looked at through a slightly different lens and would benefit from student input. The skills and knowledge taught through ESD empowers students to make choices beneficial to their own future *and* the future of the planet, to equip them with the skills needed for a changing world. Members felt that this wasn't the most significant impact either, and suggested this could be changed to 'The most significant impact ESD will have is in supporting the competencies - the skills, attributes and values - that students and staff develop to enable them to contribute to a more sustainable future, transforming their thinking so that they have a positive impact throughout their lives.' The numbered points that follow summarise the benefits for students fairly well, but this needs to be reflected in the above copy. There should probably be an acknowledgement that students can be mature students as well, and that a significant proportion of those currently in work will require ESD upskilling. Members also suggested the removal of the phrase 'wicked problems' from this page as there is no explanation of this term, and it is too subject-specific.

P10 attempts to explain the role between the SDGs and ESD a little more, but as above, this is still not very clear to those with little knowledge of the SDGs, and could be simplified.

Consulting key players on p11 is a useful chapter within section 2, but there was a phrase within it that felt outdated. In the paragraph on students and the student voice, it says 'Many students see themselves as having a vested interest in the future of their planet and society'. This feels like a very large understatement. There should also be other student bodies mentioned within this sector than NUS and SOS-UK, as students have been hugely proactive on this agenda, and there are some very prevalent groups like UKSCN, unlock and of course, Enactus. This should also include reference to involving less represented groups and increasing diversity of voices in designing the curriculum. The benefits of having diverse voices, diverse inputs and solutions to address sustainability issues in different disciplines, through curriculum change, could be included here, by including representation from minority groups.

The section on employers and enterprise makes it look a little like businesses are becoming more sustainable entirely of their own volition. While many are incredibly progressive on this agenda through choice, there is also increasing legislation and regulation that requires this, such as the expansion of the Streamlined Energy and Carbon Reporting (SECR). Not including information like this means it is not highlighted that sustainable development requirements are coming, whether business and institutions are prepared or not.

There is discussion on p12 about the broad range of stakeholders that can support and contribute towards the embedding of ESD: 'Beyond academic staff there will be a number of professional service teams that can interact with and promote ESD, supporting its design into and across curricula. Business engagement, careers, employability services and placement staff can all play

their part. Technicians, estates staff, educational developers, academic support services and quality managers can also positively contribute to discussions about ESD and help support curriculum design teams in achieving their goals.' This would be a good place to outline that these staff will need training on ESD first, as discussed in the summary at the beginning of this feedback.

Members felt that creativity was missing from the competencies currently, and that it should be included. They also felt strongly that in table 3, outdoor learning should be included.

4.   Do the reflective questions in *Section 3 ('A toolkit to inform the ESD process')* cover the relevant aspects of curriculum design?

The majority of members said the reflective questions covered the relevant aspects of curriculum design.

Additional feedback: This is a good range of questions that will certainly stimulate thought and discussion. In our opinion, the reflective questions do cover the competency element of ESD well, but could have more questions or suggestions on subject-based knowledge which should form a key part of ESD as well.

We have had some feedback that suggests changing the bullet points to numbers to make this an easier read.

There could be some questions orientated around the SDGs within this section, to help create conversation on how to use the SDGs as a framework within the context of ESD.

We had member feedback that asked for this section to provide suggestions on how to get started with ESD. Which competency should they prioritise?

This section could also be looked at again in the context of the move to virtual learning over the course of the last year. Does virtual learning create any opportunities or barriers for the provision of ESD?

5.   Will *Section 3* be useful to both experienced staff and those new to education for sustainable development when designing courses and modules?

All members said yes, section 3 will be useful to both experienced staff and those new to education for sustainable development when designing courses and modules

Additional feedback: Section 3 will undoubtedly be useful, but we echo our thoughts from above about the accessibility of the language throughout some of this guidance.

Table 3 within section 3 is also very useful, but aesthetically could be improved – even just hyperlinking rather than having the URL codes would be an improvement.

6.   Do you think the resources in *Section 4* are useful? Can you suggest any that should be added?

All members said yes, the resources in section 4 are useful.

Additional feedback: We would suggest the addition of more SDG based resources in the context of ESD. We would also suggest the addition of EAUC and the Sustainability Exchange in the category 'external support and inspiration'.

7.   Do you have any other feedback that has not been covered within these questions, for example, the length, accessibility of language?

Members did feed back that while they felt this was a great piece of guidance, probably the foremost for UK institutions (particularly on competencies), it was one of many on this topic, and some were using the UNESCO ESD learning objectives already and did not want to inundate academics with further guidance.

There was also a request for more information about how document's impact will be evaluated.

We hope this feedback from members, and from our perspective as an organisation working with universities and colleges on sustainability, is valuable.

Yours sincerely,

Iain Patton, CEO, EAUC