



House of Commons
Environmental Audit
Committee

**Sustainability in the
Home Office**

Fourth Report of Session 2014–15

*Report, together with formal minutes relating
to the report*

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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

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Summary

This report assesses the Government's progress in embedding sustainable development in the Home Office. It follows on from a similar inquiry last year on Sustainability in BIS.

The Home Office appears to be on track to meet the Government's sustainable operations targets for departments, in part by reducing the size of its estate, but also by effective use of payment-by-result contracts. It has achieved the reductions set for water, paper and waste. It is making good progress on reducing carbon emissions, despite emissions from travel increasing significantly.

The Home Office uses a 'CAESER' tool to highlight sustainability to suppliers and encourage them to improve their performance. The Government should widely adopt this tool for all major suppliers. The Home Office needs to ensure that all contracts include specific sustainability criteria and that performance on these is actively monitored and managed. It should address energy efficiency in its contracts for asylum accommodation.

Crime prevention is an important part of sustainable policing, as it reduces future social and environmental costs. Whilst the Home Office is taking steps to understand the carbon impact of crime, the Government's policies to remove housing design standards risk less sustainable outcomes. It should ensure that the full environmental and social costs of such decisions are analysed in policy appraisal.

The Government has led international efforts to tackle wildlife crime. It needs to commit long-term funding for these efforts, and further improve the quality of data on recorded and reported offences.

Like BIS, the Home Office has a senior 'sustainability champion'. All departments should ensure that they have such a post. All staff with sustainability in their job descriptions should undertake the new e-learning sustainability training, and all new civil service staff complete it as part of their induction.

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.

1 Introduction

1. Sustainability is about considering economic, social and environmental issues in a holistic way, with particular attention to long-term consequences.¹ At the start of this Parliament the Government changed its approach to monitoring sustainability. It abolished the Sustainable Development Commission and developed new processes intended to embed sustainable development in all departments, with a greater scrutiny review role for Defra and the Cabinet Office, and introduced new ‘Greening Government Commitments’. The Government acknowledged at the time the importance of the role we undertake in providing independent scrutiny.² However, as we explained in our report on *Embedding Sustainable Development: the Government’s response* in 2011, because we provide external scrutiny and challenge of Government performance on behalf of Parliament rather than the executive, we are not able to undertake the full range of performance scrutiny and advice that the Sustainable Development Commission previously undertook.³ Nevertheless our reports provide independent challenge for Government and individual departments and provide recommendations for them to make improvements.

2. This latest of our reports on sustainable development assesses sustainability in the Home Office. It follows on from our report last year on *Sustainability in BIS* and previous reports on embedding sustainability across Government.⁴ The Home Office describes its role as “promoting growth by keeping the UK safe, cutting crime, reducing immigration and preventing terrorism”.⁵ Mike Parsons, Chief Operating Officer of the Home Office told us:

Clearly, the Home Office’s main contribution to sustainability is about keeping the streets safe and the borders secure through cutting crime, securing the borders, reducing migration and preventing terrorism. Those are the Home Office’s priorities and it is through those priorities that we make the most significant contribution to social justice, community cohesion and economic growth. That together with our work around the environment and protection of endangered species is the contribution the Home Office makes to sustainability.⁶

1 National Audit Office, [Departmental Sustainability Overview: Home Office](#) (March 2014), para 1

2 Defra, [Mainstreaming sustainable development The Government’s vision and what this means in practice](#) (February 2011), p7

3 Environmental Audit Committee, Fourth report of session 2010–2012, [Embedding sustainable development: the Government’s response](#), HC 877

4 Environmental Audit Committee, Seventh Report of Session 2013–14, [Sustainability in BIS](#) HC 613; Environmental Audit Committee, First report of Session 2010–12, [Embedding sustainable development across Government](#), HC 504; Environmental Audit Committee, First Report of Session 2013–14, [Embedding Sustainable Development: An Update](#), HC 202

5 Home Office, Business Plan 2013–15, June 2013. Available at: <http://transparency.number10.gov.uk/business-plan/5>

6 Q10

The majority of the Department's spending is in the form of grants, the greater part of which go to police operations and pensions.⁷ Since November 2012, funding for local police forces has been overseen by locally elected Police and Crime Commissioners. The Department also funds the Border Agency, Border Force and the Office for Security and Counter-Terrorism and several executive agencies such as the Passport Office.

3. We have drawn on a briefing report from the National Audit Office, the Department's own Annual Report and Sustainability Report as well as other evidence, to examine Home Office policies (Part 2), operations (Part 3) and governance (Part 4) from a sustainable development perspective.

7 National Audit Office, [Departmental Sustainability Overview: Home Office](#), (March 2014), para 1.3 and figure 2

2 Policy

4. Our previous reports have highlighted the importance of departments applying guidance correctly and ensuring that civil servants have the required skills.⁸ A recent report for Defra on the quality of environmental appraisal, which audited appraisals in different departments including the Home Office, concluded that there were no systematic differences in the quality of impact assessments between departments. It concluded that quality of appraisal was most affected by the complexity of the policy area, and that departments might not assess all impacts adequately in more complex cases.⁹ We have also heard from Duncan Russel of Exeter University who told us that another review of impact assessments identified “institutional cultures and behaviours”, including a lack of time or fragmented working across Government, as factors which limited the way environmental aspects were addressed in policy appraisal.¹⁰

5. The Home Office follows central guidance issued by the Treasury which requires Government departments to take account of sustainable development and environmental impacts in policy-making. This includes guidance on appraisal, evaluation and reporting and an impact assessment toolkit. The Home Office has also developed its own internal guidance on how to undertake policy consultations.¹¹ To illustrate this, the NAO cited a January 2014 impact assessment for a proposal to ban the below-cost sale of alcohol, which considered social impacts by looking at potential effects on health and well-being and on low income households.¹²

6. 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.

7. In order to explore in more detail how the Home Office addresses sustainable development impacts in policy-making we examined work on the cost of crime in policing, and how the Border Force implements the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES)—areas that the NAO focused on in their briefing.

8 Environmental Audit Committee, First report of Session 2010–12, [Embedding sustainable development across Government](#), HC 504, para 14

9 EFTEC for Defra [Baseline evaluation of environmental appraisal and Sustainable Development guidance across Government](#) (March 2014)

10 Dr Duncan Russel et al ([ESC004](#))

11 National Audit Office, [Departmental Sustainability Overview: Home Office](#), (March 2014), para 2.2

12 National Audit Office, [Departmental Sustainability Overview: Home Office](#), (March 2014), para 2.3

The costs of crime

8. The NAO told us that the Home Office had undertaken “some innovative initiatives to embed sustainability in policy-making, such as its work to ‘design out’ crime and assess the carbon cost of crime”.¹³ The Department is developing estimates of the carbon cost of crime to ensure that its business case for investment in crime prevention recognises environmental as well as social and economic consequences. It is supporting research by the University of Surrey to further develop analysis published in 2009 by the Association of Chief Police Officers’ *Secured by Design* initiative. The NAO suggested that such information could be used “to prioritise ‘hotspots’”.¹⁴ However, Mary Calam, Director General of the Home Office’s Crime and Policing Group, told the Committee that the response to reported crime is an operational judgment for the police and that she would be “surprised” if the new research “will ever take us to a place where for specific crimes you could make judgments in relation to carbon cost”.¹⁵

9. The Home Office is also looking at ways to ‘design out’ crime, such as working with mobile phone manufacturers and networks to reduce theft. The NAO told us that “the department did not have an overarching strategy for designing out crime, but instead sees it as part of the wider crime prevention effort.”¹⁶ We heard from Professor Ken Pease, an expert in crime science, who told us that housing design is an area with long term consequences and that it is important that new houses are built to “standards of security that have been shown to be effective in reducing local crime”.¹⁷ He stated that the security standards proposed in the Housing Standards Review “would lead to an increase in crime, especially domestic burglary in new developments”, and urged that the Home Office work with DCLG to ensure higher standards were included. Mary Calam told us that Home Office officials had been working with DCLG officials on the review of building regulations.¹⁸ Our own inquiry on the *Code for Sustainable Homes and the Housing Standards Review* found that removing the existing sustainability standards would lead to poorer quality housing being built with worse energy efficiency.¹⁹ **As we stated previously, we are concerned that the Government’s current de-regulatory approach on housing standards will produce less sustainable outcomes in future years. It is important that the full environmental and social costs of such decisions are analysed in policy appraisal and minimised wherever possible.**

13 National Audit Office, [Departmental Sustainability Overview: Home Office](#), (March 2014), para 8

14 National Audit Office, [Departmental Sustainability Overview: Home Office](#), (March 2014), para 2.11

15 Q40

16 National Audit Office, [Departmental Sustainability Overview: Home Office](#), (March 2014), para 2.12

17 Q2

18 Q44

19 Environmental Audit Committee Eighth Report of Session 2012–13, [Code for Sustainable Homes and the Housing Standards Review](#), HC 192

Wildlife crime

10. The Home Office makes an important contribution to sustainability through enforcing CITES regulations. The Border Force is responsible for carrying out regulatory checks on goods listed under international regulations to support the legitimate trade in endangered flora and fauna species, and for detecting and taking appropriate enforcement action over breaches of the rules. It works with HM Revenue and Customs, the National Wildlife Crime Unit (part funded by the Home Office), the National Crime Agency and the Crown Prosecution Service. The Department for Environment, Food & Rural Affairs is the UK's management authority for CITES and is ultimately responsible for issuing permits for CITES-listed imports and exports.²⁰

11. In our 2012 report on *Wildlife Crime*, we identified the scale of the illegal trade in wildlife. In our current inquiry WWF and TRAFFIC told us that the illegal trade in wildlife remains “one of the most profitable illicit transnational activities worldwide” with an estimated value of \$7.8–10 billion a year”.²¹ The Border Force have increased seizures of CITES-listed goods since 2008-09. Ivory seizures have increased from 2.2kg in 2009–10 to 80.7kg in 2012–13. Whilst seizures of CITES-listed goods fell in 2013–14, the Border Force considered that this was because of recent changes to the listing, which now no longer included agarwood parts and derivatives, removing these from the figures.²²

12. In our 2012 report on *Wildlife Crime*, we recommended that the Government exert “robust diplomatic pressure in favour of the development and enforcement of wildlife law”.²³ In February 2014 the UK Government, supported by the Home Office, hosted an international conference in London on the Illegal Wildlife Trade. WWF and TRAFFIC welcomed the “strong Declaration” that was agreed at the conference.²⁴ Grant Miller of the Border Force told us that whilst he had not yet been able to discern a change in the market as a result of the Conference, it had led to important new initiatives, such as “a critical communication tool for wildlife enforcers and scientists tackling the illegal wildlife trade”.²⁵ **We are pleased by the leadership that the Government has shown to promote international action against the illegal trade in wildlife, including the recent London Conference. It is important that this momentum is maintained to ensure that strong words are translated into concrete and sustained action to tackle wildlife crime.**

13. WWF and TRAFFIC highlighted the importance of long-term funding for the Wildlife Crime Unit. Sarah Goddard of WWF told us that whilst she welcomed the recent commitment for two year's funding for the National Wildlife Crime Unit, which was an improvement on the previous year-on-year funding, long-term certainty over funding was needed. She wanted to see the budget inflation-linked and to continue to provide funding

20 National Audit Office, [Departmental Sustainability Overview: Home Office](#), (March 2014), para 2.15

21 WWF and TRAFFIC ([SHO001](#))

22 National Audit Office, [Departmental Sustainability Overview: Home Office](#), (March 2014), para 2.16

23 Environmental Audit Committee, Third report of 2012–13, [Wildlife Crime](#), HC 140

24 WWF and TRAFFIC ([SHO001](#))

25 Q50

for an internet investigation officer.²⁶ The Home Office told us that it was not possible to commit funding beyond 2015–16, as no Government spending had been allocated yet for that far ahead.²⁷ ***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.***

14. In our previous *Wildlife Crime* report, we recommended that the Government review its performance on prosecuting wildlife crimes in England.²⁸ The Government responded that it considered that the Crown Prosecution Service (CPS) to be effective in prosecuting wildlife crime.²⁹ However, in this inquiry WWF and TRAFFIC told us they “still do not feel that there are sufficient penalties being handed out in all cases. It is a bit hit and miss”, and recommended that the CPS should consider using specialist prosecutors and that clear sentencing guidelines should be introduced for the judiciary.³⁰ A report by World Animal Protection in August 2014 made a similar point:

Conviction rates for wildlife crime across the UK are sometimes disappointingly low. Prosecutors often do not have the expertise in wildlife legislation to present cases as effectively as they could, and quite often, cases do not even make it to court, as they are deemed either ‘victimless’ or ‘not in the public interest.’³¹

15. 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.

16. On 14 April, Home Office Minister Norman Baker wrote to us announcing that the Home Office was introducing a separate category code within the police’s ‘Counting Rules’ for Wildlife Crime:

Counting Rules will no longer brigade together wildlife crime together with a range of separate crime types ...and that wildlife crime will now be a separate item recorded in police statistics.³²

Mary Calam told us that “the current changes will brigade together a number of wildlife offences that appear already in the counting rules but are scattered around. This will make for a better and much clearer picture of recorded wildlife crime.”³³ She also told us that the Government had asked the Law Commission to look into the scope for reform and consolidation of offences to make them easier to track.

26 Q6

27 Q52

28 Environmental Audit Committee, Third report of 2012–13, [Wildlife Crime](#) HC 140, para 59

29 Environmental Audit Committee Fourth Special Report of 2012–13 [Government response to the Committee’s Third report of Session 2012-13](#), HC 1061, para 8

30 Q9

31 World Animal Protection [Wildlife Crime in the UK](#) (August 2014), p11

32 [Letter from Norman Baker MP](#), dated 14 April 2014

33 Q53

17. WWF and TRAFFIC welcomed the proposed coding changes, but told us that data still “is probably not sufficiently detailed and comprehensive enough and we need detailed coding in order to be able to monitor what is going on with wildlife crime in detail.”³⁴ They believed that “despite offences under COTES [Control of Trade in Endangered Species (Enforcement) Regulations 1997] and CEMA [Customs and Excise Management Act] being recordable, at present it is not possible to obtain information on prosecutions under COTES or CEMA”.³⁵ World Animal Protection’s *Wildlife Crime in the UK* report concludes that the lack of data means that “it is impossible for the Government and police to analyse trends and crime rates, and accurately estimate the true scale of wildlife crime across the UK.”³⁶ The Border Force told us that it would be the responsibility of the National Crime Agency to populate such a database, as the Wildlife Crime Unit was an intelligence Unit and no longer carried out its own prosecutions.³⁷ Grant Miller from the Border Force told us that responding to different stakeholders requests for data represented “quite a substantial cost” to the organisation, and he supported any efforts to develop a “smart way to report them”.³⁸ The Home Office confirmed, however, that at present the Government had no plans to introduce such a database.³⁹ It highlighted that wildlife crime priorities were based on strategic and tactical assessments, including intelligence from a number of organisations, and told us that “incident data alone is not the answer”.⁴⁰

18. 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.

34 Q7

35 WWF and TRAFFIC ([SHO001](#))

36 World Animal Protection, [Wildlife Crime in the UK](#), (August 2014), p11

37 Q55

38 Q47

39 Home Office ([SHO004](#))

40 Home Office ([SHO004](#))

3 Operations

Greening Government Commitments

19. The Greening Government Commitments are a series of sustainability targets for departments that the Government set in February 2011 covering carbon emissions, resource use and sustainable procurement over the course of the Parliament.⁴¹ They replaced the Sustainable Operations on the Government Estate targets that our predecessor Committees scrutinised.⁴² Our previous reports identified that progress towards the Greening Government Commitments had been generally good, with many departments on track to achieve them ahead of schedule.

20. The Home Office has complied with annual reporting requirements and in October 2013 published its first separate Sustainability Report⁴³ which the NAO described as a “thorough and transparent report which complies with the HM Treasury sustainability reporting requirements.”⁴⁴

21. The Home Office have made good progress towards achieving the Greening Government Commitments. The NAO concluded that in 2012–13, the Home Office had met two of the five targets set for 2015 (on water and paper use) and was making good progress against its waste targets.⁴⁵ Subsequently the Home Office’s 2013–14 Annual Report indicated that the target for office waste had now also been achieved, with office waste 35% less than the 2009–10 baseline, against a 25% target.⁴⁶ The Department has introduced separate bins for mixed dry recycling, and food and compostable materials, and diverts previously landfilled waste to be used for heat and power.⁴⁷ The Home Office is successfully reducing its total carbon emissions, primarily through reducing its building-related emissions. Its 2013–14 Annual Report indicates that it has achieved a 23% reduction in carbon dioxide equivalent emissions since 2009–10, just short of the 25% target for 2015. However, as total emissions increased slightly in 2013–14 compared with 2012–13, further work is still needed.⁴⁸

22. Our report on *Sustainability in BIS* recommended that where departments had already made good progress, they should consider setting themselves more stretching targets to

41 The Greening Government Commitment targets are to reduce greenhouse gas emissions by 25% by 2015, from 2009–10 levels; cut domestic business flights by 20% by 2015, from 2009–10 levels; reduce the amount of waste generated by 25% by 2015 (including water), from 2009–10 levels; cut paper use by 10% in 2011–12; and embed sustainable procurement into government and departmental contracts by 2015

42 Environmental Audit Committee, First Report of Session 2013–14, [Embedding Sustainable Development: An Update](#), HC 202, para 22

43 Home Office, [Sustainability Report 2012-13](#), (October 2013)

44 National Audit Office, [Departmental Sustainability Overview: Home Office](#), (March 2014), para 1.20

45 National Audit Office, [Departmental Sustainability Overview: Home Office](#), (March 2014), para 3.2

46 Home Office [Annual Report and Accounts 2013-14](#), HC 21, (June 2014), p33

47 Home Office ([SHO004](#))

48 Home Office [Annual Report and Accounts 2013-14](#), HC 21, (June 2014), p31

maintain momentum.⁴⁹ The NAO state that the Home Office “considers that it will be a challenge to continue to reduce its reported emissions, waste and water use significantly beyond 2014–15”.⁵⁰

23. Many of the building-related emissions reductions have come from consolidating its estate, including closing seven major buildings.⁵¹ However, it has also made good use of payment by results contracts to reduce emissions such as by replacing equipment, renewing control mechanisms and changing staff behaviours.⁵² The Home Office told us that currently just over 40% of buildings are rated as poor energy performance (F & G ratings), and there is therefore considerable scope for further improvement.⁵³ **The Home Office has significantly reduced emissions from its offices, including through reducing the size of its estate and by introducing performance-related contracts. However, it still has a large number of buildings with poor energy performance, and it should take steps to improve the efficiency of these.**

24. Although total emissions are falling, the Home Office’s travel related emissions have increased significantly. Since 2009–10, total emissions of carbon dioxide relating to travel have increased by 24%, and the number of domestic flights have increased by 9%.⁵⁴ The Home Office stated that this increase was due to operational requirements, and one-off events such as the Olympics and Commonwealth Games.⁵⁵ They told us that there is clear guidance that “flights should only be considered where other options are poorer value for money or do not meet business needs”.⁵⁶ The Home Office has invested in video conferencing facilities, but it is unclear what effect this is having on the number of journeys taken. **Carbon emissions from travel have increased significantly in the Home Office in recent years. Whilst it can point to operational reasons for this increase, it is unclear whether its travel guidance is being followed in all cases. Its investment in video conferencing facilities will have highest environmental benefits where video meetings replace face-to-face meetings, and so it is important that managers rigorously challenge the need for staff travel.**

25. The Home Office’s 2012–13 Sustainability Report states that it will be involved in supporting Defra and Cabinet Office to develop a programme of targets for beyond 2015. It also includes a statement from Carbon Smart, who have been reviewing the Greening Government Commitments, which says:

As new reporting targets are due to be defined ready for 2015, it could be that Government includes a wider range of scope (or indirect) emissions within its mandate. Carbon Smart believes there are significant opportunities for

49 Environmental Audit Committee, Seventh Report of Session 2013–14, [Sustainability in BIS](#), HC 613, para 8

50 National Audit Office, [Departmental Sustainability Overview: Home Office](#), (March 2014), para 3.4

51 Home Office, [Annual Report and Accounts 2013-14](#), HC 21, (June 2014)

52 Q61

53 Q63

54 Home Office, [Annual Report and Accounts 2013-14](#), HC 21, (June 2014) p32

55 Home Office, [Annual Report and Accounts 2013-14](#), HC 21, (June 2014) p32

56 Q69

influencing improvements in supplier performance and reducing these indirect, scope 3 emissions.

The Home Office already estimates such indirect emissions for suppliers, including as part of the Green ICT Strategy (paragraph 27). In our previous reports, we have recommended that targets are on a ‘per unit’ basis to ensure they measure overall efficiency rather than improvement only in absolute terms. Despite the Home Office’s role in developing future Greening Government targets, they could not share these with us because these were “a matter for Defra”.⁵⁷

26. The Home Office is making good progress towards achieving the Greening Government Commitment 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.

ICT

27. In March 2013, the Home Office was one of seven departments to achieve a rating of level 3 (on a scale of 1-5) on the Cabinet Office’s ICT maturity model. The Government has set an ambition for all departments to achieve this by 2015. The Government’s targets for ICT are additional to the Greening Government Commitments, and follow a different methodology by including indirect carbon emissions; in this case from off-site servers. The Home Office is taking steps to address the areas where it achieved relatively lower scores. Officials explained that it had started to include sustainability issues in IT investment business cases and replace desktops with thin ‘client’ machines. Further savings were expected to be made as the department move to cloud-based services instead of contracts with data centres.⁵⁸

Adapting to climate change

28. Climate change, and the associated increased likelihood of extreme weather events, poses challenges for long-term sustainable development. The Home Office has produced a climate adaptation plan, but this has not been updated since 2011, the last time there was a formal requirement to do so. It has, however, taken some steps to identify which of its sites may be affected by climate change, and to reduce these risks, for example by remedial work to its Leeds office.⁵⁹ We are undertaking a separate inquiry into climate change adaptation in which we expect to examine adaptation measures in Government and other organisations.

57 Q78

58 Q79

59 National Audit Office, [Departmental Sustainability Overview: Home Office](#), (March 2014), paras 3.14-3.17

Procurement

29. Our previous reports have been critical of government departments' performance on sustainable procurement. The NAO found in 2013 that most had only a patchy record in meeting reporting requirements for their performance on sustainable procurement.⁶⁰ Our report on *Sustainability in BIS* found that BIS was unable to identify the extent to which its contracts complied with Government Buying Standards. In the 2012–13 Greening Government Commitments Annual Report, the Government included an assessment of departments' compliance with six of the Government Buying Standards. The Home Office reported excellent performance in ICT, construction and furniture, with lower compliance on food and catering, paper, and vehicles.⁶¹

30. Procurement expenditure in the Home Office group totalled £2.6 billion in 2012–13. Around 25% of this was spent on IT and telecoms. Facilities management expenditure accounted for another 15%.⁶² The Home Office estimated that the carbon footprint of its supply chain was around ten times that of its own estate and travel. It aims to embed sustainability in the procurement process through business cases and by introducing the CAESER (Corporate Assessment of Environmental, Social & Economic Responsibility) tool, which uses supplier responses to questionnaires to identify and mitigate risks. It asks suppliers, for example, whether they procure timber products only from sources verified as legal and sustainable. The results are used to identify areas that suppliers should improve. The Home Office reported that there had been an increase in the number of suppliers who had indicated that they follow this sustainable timber policy since the introduction of this approach. The Home Office believed that the more departments use this tool, the greater its impact will be. The Government is planning to roll out a new tool to all departments,⁶³ which Home Office officials told us contained “a sort of light version of CAESER” but they felt that there was “potential for that to be pushed further and use the full CAESER”.⁶⁴ Philip Duddell, a sustainable procurement expert and independent consultant, told us that the Home Office had a good record on sustainable procurement, and particularly praised its “willingness and enthusiasm to embrace sustainable procurement, in a practical manner”. However, he expressed caution that there “may sometimes be an over-reliance on the CAESER tool”, and highlighted the need to ensure that relevant requirements are included in contracts.⁶⁵ The Home Office acknowledged that “we do include sustainability in our procurement, but we do not do it in a consistent way. ... We are working now to build a consistent and minimum set of standards for inclusion on sustainability in procurement”.⁶⁶

60 National Audit Office, [Sustainable procurement in government](#) (February 2013), paras 16, 2.22-2.23

61 HM Government, [Greening Government Commitment report 2012-13](#), (December 2013), Annex 1

62 National Audit Office, [Departmental Sustainability Overview: Home Office](#), (March 2014), para 4.5

63 The new tool is the 'Sid4Gov portal'. National Audit Office, [Departmental Sustainability Overview: Home Office](#), (March 2014), para 4.10

64 Q85

65 Philip Duddell ([SHO002](#))

66 Q103

31. Accommodation and services for asylum seekers and their families, while their cases are being processed, accounts for 8% of the Home Office's procurement spend. The carbon footprint of asylum accommodation and services is equivalent to more than half of the carbon footprint of the Department's built estate. As these emissions are not directly produced by the Home Office or an executive agency, they are currently not counted in the Greening Government Commitment targets (paragraph 21). The Home Office signed contracts in March 2012 with three providers of asylum accommodation, known as the COMPASS contracts. These contracts include clauses relating to the environmental impact of provider's own estates and require a set of sustainability key performance indicators (KPIs) to be documented and monitored. We heard, however, that these indicators have yet to be agreed and the Home Office was "in ongoing discussions ... that will lead to this KPI [being set] within three months".⁶⁷ The NAO report that many properties for asylum seekers and their families, included in the COMPASS contracts, did not meet contractual quality standards. These quality standards require that a property should be insulated to a 'reasonable' level and have a 'reasonably' modern boiler.⁶⁸ John Fernau, the Home Office's Commercial Director, told us "landlords are responsible for the fabric of a building, which includes heating systems, and landlords are reluctant to...make any capital expense and expenditure that they do not need to." He told us that he was not aware of proposed energy efficiency standards for tenanted property, which would require landlords to ensure properties meet minimum standards by 2018, but said that the Department would be "happy to engage with the suppliers to encourage them" to meet the legislative requirements before they come in.⁶⁹ He also acknowledged that the Home Office had yet to look into how the Government might develop the Green Deal and ECO improvement schemes within these properties.⁷⁰

32. As a result of changes to the accountability arrangements for policing, police authorities were replaced by elected police and crime commissioners (PCCs) in England and Wales in 2012. Despite this the Home Office's Accounting Officer is still answerable to Parliament for the funds given to police forces. The Department has not set any requirements for PCCs to publish environmental sustainability data as part of this system, or issued any formal guidance to police forces. It instead engages with the National Police Estates Group, on which it is represented, and publishes advice on areas such as sustainable building design.⁷¹ The Home Office told us that they "do not assess sustainability across how [police forces] are performing" but that they do "analyse their spend" and are looking at how they can "benchmark and compare and contrast that spend".⁷² They added that the areas of greatest environmental impact were likely to be estates, and particularly areas such as vehicles, tyres, glass and windscreens.⁷³ The Government introduced legislation in 2011

67 Q94

68 National Audit Office, [Departmental Sustainability Overview: Home Office](#), (March 2014), para 4.13

69 Q99

70 Q100

71 National Audit Office, [Departmental Sustainability Overview: Home Office](#), (March 2014), para 2.7

72 Q105

73 Q107

requiring forces to procure body armour, ICT and vehicles through national frameworks, which (with the exception of body armour) include high-level sustainability requirements.⁷⁴

33. Philip Duddell told us that the Home Office had indicated “some uncertainty” about the relevance of the Public Services (Social Value) Act to its procurement activity.⁷⁵ This legislation encourages commissioners of services to take social impact into account in its decisions alongside price. Home Office officials explained that they have not done this as “it is difficult ... to assess the impact in a specific area, because we are looking to provide services over the whole country”. However, they acknowledged that there is the “potential” to do so, but that it was not a current priority.⁷⁶

34. 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.

35. 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.

36. 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.

74 National Audit Office, [Departmental Sustainability Overview: Home Office](#), (March 2014), paras 2.5-2.9, 4.15-4.18

75 Philip Duddell ([SHO002](#))

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4 Governance

37. The NAO concluded that the Home Office had “established clear governance arrangements for sustainability”.⁷⁷ This includes Ministerial level involvement of both the Parliamentary Under Secretary of State for Criminal Information and the Minister of State for Crime Prevention. It has a dedicated sustainable development team, which reports to a sustainability committee of officials from across the Departmental group on a quarterly basis.⁷⁸

38. Like BIS, the Home Office has a senior ‘champion’ for sustainability.⁷⁹ At the time of our evidence session in April the new Sustainability Champion, the Director of Finance and Estates, was only recently appointed. The Sustainability Champion reports to the Chief Operating Officer, who in turn reports to the Permanent Secretary. Mike Parsons, Chief Operating Officer, told us that the Sustainability Champion’s responsibilities were still being defined, but included overseeing the production of the Sustainability Report, Annual Report and Accounts, chairing the Sustainability Group, “driving forward the business plan commitments around the Greening Government Commitments, and overseeing the other commitments that are around ensuring that sustainability is embedded in policy making and the SME agenda and achieving our targets in that agenda”.⁸⁰

39. We asked Mike Parsons about the importance of sustainability experience to the role of Director of Finance and Estates. He told us that they did not specifically talk about sustainability in the interviews⁸¹ and that “previous knowledge was not one of the essential requirements”, but “it is absolutely part of the role.”⁸²

40. *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.*

41. The Department told us that it has embedded sustainability into staff competencies. The Civil Service Competency Framework 2012–2017 is made up of ten competencies, of which six explicitly refer to sustainability. Whilst this is a positive step, we have no evidence on the extent to which sustainability is being actively demonstrated. Indeed the example of the recruitment of the Home Office Sustainability Champion role suggests that more work is needed in this area to ensure that this is understood, actively demonstrated and used to assess staff performance.

77 National Audit Office, [Departmental Sustainability Overview: Home Office](#), (March 2014), para 1.10

78 National Audit Office, [Departmental Sustainability Overview: Home Office](#), (March 2014), paras 1.10-1.11

79 National Audit Office, [Departmental Sustainability Overview: Home Office](#), (March 2014), para 1.11

80 Q20

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82 Q18

42. The NAO reported that the Home Office has a voluntary 45 minute training module on sustainability, which only 72 staff out of over 30,000 had completed. The Home Office told us that they are working on a new e-learning module with Defra, which is available for staff to complete on the Civil Service Learning website. The Home Office told us that they will make this compulsory for any staff with a clear sustainable development role, and the Cabinet Office will be asked by Defra for their views on making it mandatory. ***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.***

Conclusions

1. As we stated previously, we are concerned that the Government's current de-regulatory approach on housing standards will produce less sustainable outcomes in future years. It is important that the full environmental and social costs of such decisions are analysed in policy appraisal and minimised wherever possible. (Paragraph 9)
2. We are pleased by the leadership that the Government has shown to promote international action against the illegal trade in wildlife, including the recent London Conference. It is important that this momentum is maintained to ensure that strong words are translated into concrete and sustained action to tackle wildlife crime. (Paragraph 12)
3. The Home Office has significantly reduced emissions from its offices, including through reducing the size of its estate and by introducing performance-related contracts. However, it still has a large number of buildings with poor energy performance, and it should take steps to improve the efficiency of these. (Paragraph 23)
4. Carbon emissions from travel have increased significantly in the Home Office in recent years. Whilst it can point to operational reasons for this increase, it is unclear whether its travel guidance is being followed in all cases. Its investment in video conferencing facilities will have highest environmental benefits where video meetings replace face-to-face meetings, and so it is important that managers rigorously challenge the need for staff travel. (Paragraph 24)

Recommendations

5. 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)
6. 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)
7. 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)

8. 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)
9. The Home Office is making good progress towards achieving the Greening Government Commitment 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)
10. 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)
11. 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)
12. 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)
13. 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)
14. 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)

Formal Minutes

Wednesday 3 September 2014

Members present:

Joan Walley, in the Chair

Peter Aldous
Neil Carmichael
Zac Goldsmith
Mike Kane

Caroline Lucas
Dr Matthew Offord
Mrs Caroline Spelman

Draft Report (*Sustainability in the Home Office*), proposed by the Chair, brought up and read.

Ordered, That the draft Report be read a second time, paragraph by paragraph.

Paragraphs 1 to 42 read and agreed to.

Summary agreed to.

Resolved, That the Report be the Fourth Report of the Committee to the House.

Ordered, That the Chair make the Report to the House.

Ordered, That embargoed copies of the Report be made available, in accordance with the provisions of Standing Order No. 134.

[Adjourned till Wednesday 10 September at 2.00 pm]

Witnesses

Wednesday 30 April 2014

The following witnesses gave evidence. The transcript can be viewed on the Committee's inquiry page at www.parliament.uk/eacom.

Professor Ken Pease, Professor of Crime Science, University College London, and **Sarah Goddard**, Species Policy Adviser, WWF-UK.

[Q1–9](#)

Mike **Parsons**, Chief Operating Officer, Home Office, **Mary Calam**, Director General, Crime and Policing Group, Home Office, **John Fernau**, Director, Commercial, Home Office, and **Grant Miller**, Border Force Senior Officer, Home Office.

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Published written evidence

The following written evidence was received and can be viewed on the Committee's inquiry webpage at www.parliament.uk/eacom. Inquiry numbers are generated by the evidence processing system and so may not be complete.

- 1 WWF-UK ([SHO0001](#))
- 2 Philip Duddell ([SHO0002](#))
- 3 Ken Pease ([SHO0003](#))
- 4 Home Office ([SHO0004](#))