



National Audit Office

Briefing

for the House of Commons
Environmental Audit Committee

Home Office

Departmental Sustainability Overview: Home Office

MARCH 2014

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The National Audit Office study team consisted of: Sudeep Gokarakonda, Nazrul Haque, James Lever and Katy Losse under the direction of Jill Goldsmith.

This report can be found on the National Audit Office website at www.nao.org.uk

For further information about the National Audit Office please contact:

National Audit Office
Press Office
157–197 Buckingham Palace Road
Victoria
London
SW1W 9SP

Tel: 020 7798 7400

Enquiries: www.nao.org.uk/contact-us

Website: www.nao.org.uk

Twitter: @NAOorguk

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Summary

Background

1 Sustainability is about considering economic, social and environmental issues in a holistic way, with particular attention to long-term consequences. It can be thought of as a long-term, integrated approach to achieving improvements in quality of life while respecting the need to live within environmental limits.

2 Government departments can play a key role in helping to make development more sustainable through the regulatory and policy frameworks they put in place, the programmes they fund, and the way they manage their own operations. The coalition government set out its vision for sustainable development in February 2011 in which it committed to mainstream sustainability so that it is central to the way government makes policy, procures goods and services and runs its estate.

3 The Environmental Audit Committee (the Committee) has published three reports on government's progress in embedding sustainability in this Parliament, including a report on sustainability at the Department for Business, Innovation & Skills (BIS), which drew on a briefing we provided. In its most recent report on government-wide progress the Committee concluded that more needs to be done to build sustainability into policy appraisals and the business planning process, to be more ambitious about environmental targets, and to improve the quality of sustainability reporting.¹ The Committee's report on BIS included recommendations for other government departments concerning the merits of a dedicated sustainability champion, a sustainability committee and sustainable development strategy; and of reviewing the sustainability impacts of all a department's policies.² The Committee also raised a concern about public bodies' compliance with requirements for sustainability reporting.

4 This report assesses sustainability at the Home Office (the Department). It follows a similar format to our report on sustainability at BIS and thus covers all aspects of the Department's activities: governance, policy, operations and procurement. We assessed the Department against our evaluative criteria set out in Appendix One. This report complements and supplements the Department's own sustainability report, with the aim of providing critical analysis and more detail on material issues. It includes case studies on crime and policing, the Department's information and communications technology (ICT), asylum accommodation and its enforcement of restrictions on international trade in endangered species.

¹ HC Environmental Audit Committee, *Embedding sustainable development: an update*, First Report of Session 2013-14, HC 202, June 2013.

² HC Environmental Audit Committee, *Sustainability in BIS*, Seventh Report of Session 2013-14, HC 613, November 2013.

Key findings

Governance

5 The Department has a good understanding of its sustainability impacts, across the range of its activities (paragraphs 1.5, 1.6 and **Figure 3**). These impacts include the Department's role in the social and economic aspects of sustainability:

- The Department is responsible for tackling crime and terrorism. Crime and terrorism have a direct financial cost for those affected, a significant impact on personal well-being, and indirectly affect the sense of community and conduciveness to business of a neighbourhood.
- The Department's policies and approach to immigration directly affect the well-being of immigrants and those seeking asylum and have wider implications for social cohesion and the growth of the UK economy.

These impacts also include an influence over significant environmental impacts including:

- the emissions, energy and water use, and waste footprint of the estate of the core department and its arm's-length bodies, including buildings, IT and vehicles;
- the procurement choices of the core department, arm's-length bodies and to a lesser extent, police forces;
- the carbon emissions associated with crime; and
- the incidence of environmental crime, including the black market trade in endangered species.

6 The Department has well-established governance arrangements for promoting, monitoring and reporting on sustainability in its operations and the associated targets set under the greening government commitments. It has a senior sustainability champion, dedicated sustainable development team and committee, and initiatives to engage staff across the organisation. The Department's key sustainability staff have tailored sustainable development objectives and wider staff performance is assessed against the civil service-wide competencies which reference sustainability. The Department produced an engaging and informative sustainability report for 2012-13, which expands on the sustainability section of its annual report and accounts. Reporting and monitoring on the Department's resilience to climate change and its approach to addressing sustainability in its policymaking are less well developed (paragraphs 1.10–1.21 and 3.14).

7 The Department has not formally set priorities for environmental sustainability. The annex to its business plan on sustainable development gives examples of the work it is doing, rather than priority areas for action. There is no explicit reference to environmental sustainability in the Department's 2014 improvement plan, in which the Department sets out its plans for transforming the Home Office. In practice, the Department's priority so far has been to reduce the direct environmental impact of the buildings it owns and its business travel, to meet the greening government commitments (paragraphs 1.7–1.9 and 1.15).

Policy and policy making

8 The Department has some innovative initiatives to embed sustainability in policy making, such as its work to 'design out' crime and assess the carbon cost of crime. The Department has not set environmental reporting requirements as part of the new accountability arrangements for the police, following the introduction of police and crime commissioners in November 2012, but instead seeks to encourage sharing of best practice by participating in a police environment group (paragraphs 2.5–2.14).

9 One way the Department makes an important contribution to sustainability is through enforcing the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES). Its seizures of CITES-listed goods doubled between 2008-09 and 2012-13, though without an estimate of undetected activity over this period it is difficult to judge performance (paragraphs 2.15–2.20).

Operations

10 The Department has made some good progress in reducing the environmental impact of its operations. It has already met two of the five greening government targets (on water and paper use) and has made good progress on its waste targets (paragraphs 3.2–3.7).

11 The Department has further to go on its greenhouse gas emissions target, having achieved an 18 per cent reduction on 2009-10 levels by 2012-13 against a target of a 25 per cent reduction by 2014-15. The Department is responsible for more than 10 per cent of domestic flights undertaken by government. It reduced domestic flights by 19 per cent between 2009-10 and 2012-13, compared with a 30 per cent reduction across all government departments. The Department considers that it will be a challenge to continue to reduce emissions significantly beyond its 2014-15 targets because its estate consolidation is largely complete and further energy saving measures offer a low return on investment (paragraphs 3.2–3.7).

12 The Department was one of seven across government in 2012-13 to report that it had already met or exceeded a key Cabinet Office target for all departments to reach level 3 (on a scale of 1–5) on its green ICT maturity model by 2015. This reporting is required by the Cabinet Office and covers the resources and energy consumed by ICT and its associated greenhouse gas emissions, as well as ICT’s role in changing the way government provides services, and thus its potential to achieve environmental improvements on a wider scale (paragraphs 3.8–3.13).

Procurement

13 The Department has taken steps to understand the impacts of its supply chain and embed sustainability in its procurement processes. The Department was one of the first across government to use the Corporate Assessment of Environmental, Social and Economic Responsibility (CAESER) tool, which uses a self-assessment questionnaire for suppliers to collect environmental and social data, and identify risks and opportunities for improvement. The environmental footprint data that CAESER provides are for a supplier as a whole, it does not give a breakdown for the proportion attributable to the Department’s activities. The Department has commissioned a separate analysis, which suggests the carbon footprint of its supply chain is around ten times that associated with the Department’s built estate and business travel. The Cabinet Office expects to soon roll out a tool to all departments, via the ‘Sid4Gov’ portal, in order to help provide data on carbon emissions, waste generation and water consumption across key suppliers, in line with the greening government commitments. The Department expects its leverage over suppliers will increase the more other departments use CAESER and the more the Cabinet Office’s Crown Representatives engage with the tool’s outputs. The Department has included sustainability clauses in contracts for two of the three mandatory national frameworks for police procurement (paragraphs 4.4–4.10 and 4.15–4.18).

14 The Department is not actively managing the significant sustainability impacts of the asylum estate, provided under contract by third parties. The Department has taken an important first step by calculating the carbon footprint of the asylum estate, which it estimates to be equivalent to more than half of the emissions from the departmental group’s built estate. It has not yet agreed sustainability targets with providers but it has plans to do so, and many properties do not meet required standards intended to ensure a safe and habitable living environment and a minimum level of energy efficiency (paragraphs 4.11–4.14).

Areas of interest to the Committee

15 The Committee may be interested in exploring the following issues:

Governance

- What the Department's priorities should be in contributing to sustainable development.
- The progress made by the Department's sustainability committee, champion and lead on sustainability in policymaking.
- How the Department's next sustainability champion might develop the role (the current incumbent is due to leave in March 2014).
- The benefits from producing a separate sustainability report, how the Department should develop its report, and whether there are lessons for other government departments from the Department's approach.
- The embedding of sustainability in the civil service competency framework.

Policy and policymaking

- The roles of the Department, police and crime commissioners and others in addressing the sustainability impacts of the police service. The potential for research into the carbon cost of crime to influence decision-making and the importance this research should be accorded.
- The Department's progress in enforcing international rules restricting the trade in endangered species, and how it works with the Department for Environment, Food & Rural Affairs and others to tackle the underlying problem.

Operations

- How the Department's experience might inform the setting of departmental and government-wide environmental targets once the greening government commitments come to an end in 2015.
- The ambition of the Department's plans to reduce domestic flights.
- The use of payment by results in facilities management contracts.

Procurement

- The utility of the CAESER tool for reporting on and monitoring the impact of the Department's supply chains and how the Department might develop its approach.
- How government as a whole might engage with key suppliers to reduce their supply chain impacts.
- The Department's plans to work with contractors to ensure housing stock for asylum seekers meets required standards.

Part One

Sustainability responsibilities and governance

Introduction

1.1 This part of the briefing sets out background information on the Home Office (the Department) and the nature of its sustainable development impacts. It reviews the extent to which sustainable development considerations are incorporated within the Department's formal governance structures, covering:

- strategic objectives;
- accountability and decision-making processes;
- staff engagement; and
- monitoring and reporting processes.

The nature of the Department's business

1.2 The Department's priorities are to:

- promote growth by keeping the UK safe;
- cut crime;
- reduce immigration; and
- prevent terrorism.³

1.3 The Department delivers its policies through its central core and partner organisations, which together make up the departmental group (**Figure 1**). Grants towards police operations totalled £5.5 billion in 2012-13, accounting for 46 per cent of the departmental group’s spending. The UK Border Agency (UKBA) and Border Force (now both part of the core department) spent £2.2 billion accounting for 19 per cent of the departmental group’s expenditure. The Office for Security and Counter-Terrorism spent £1.2 billion, accounting for a further 10 per cent of the departmental group’s expenditure. (**Figure 2**).

Figure 1
Departmental group structure as at 1 February 2014

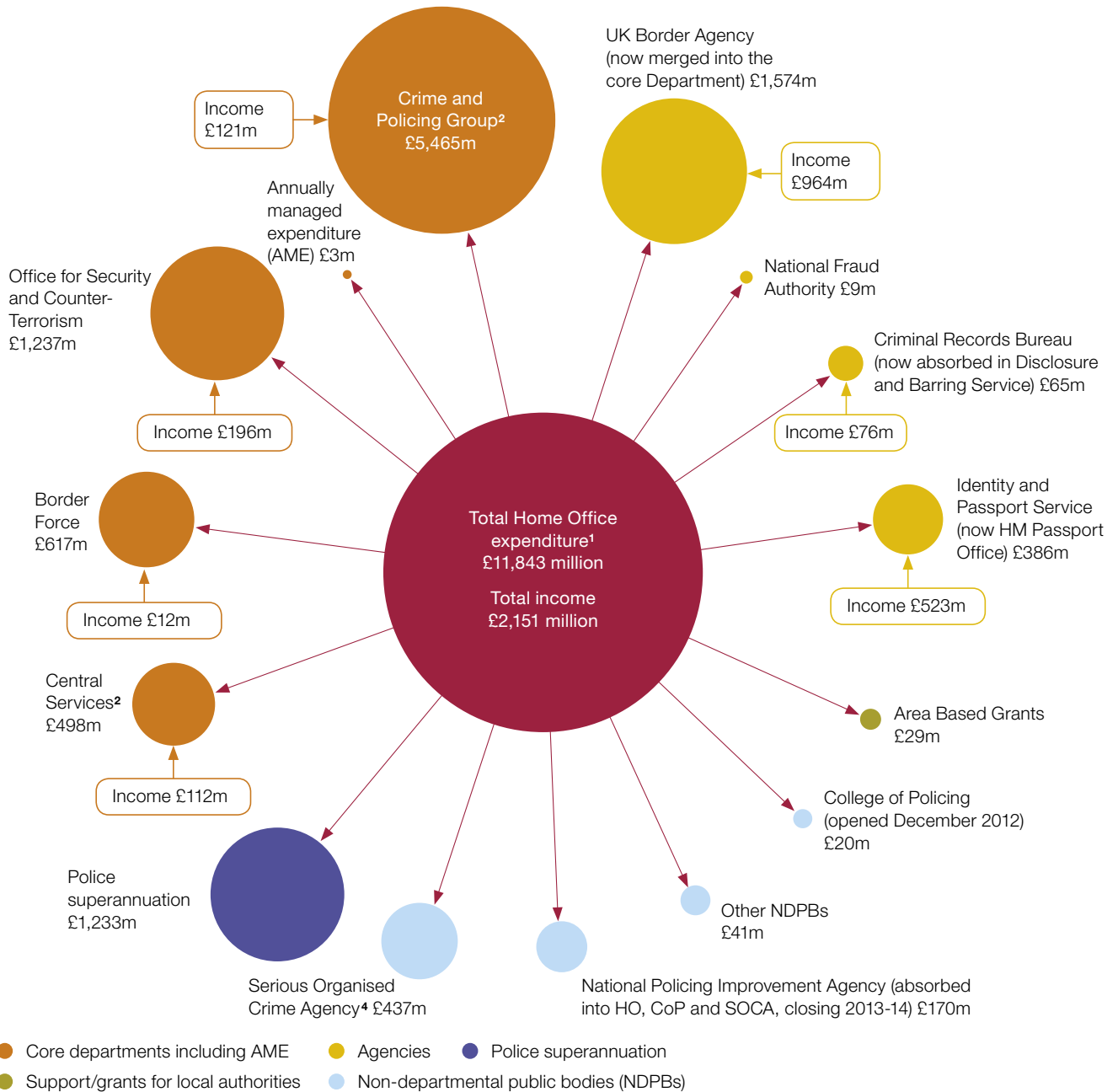
Departmental group

Core Department directorates	
Office for Security and Counter-Terrorism	Corporate Services
Crime and Policing Group	Human Resources
UK Visas and Immigration	Legal
Immigration Enforcement	Strategy, Delivery and Private Office Group
Border Force	
International and Immigration Policy Group	
Executive agencies and executive non-departmental public bodies	
HM Passport Office	Disclosure and Barring Service
National Fraud Authority	Office of the Immigration Services Commissioner
	Security Industry Authority
	Independent Police Complaints Commission

Source: Home Office

Figure 2

Where the Department spent its money in 2012-13



Notes

- 1 The Department's net expenditure in 2012-13 was £9.7 billion (£11.8 billion gross expenditure less £2 billion income).
- 2 Excludes spending by non-departmental public bodies disclosed elsewhere in the diagram.
- 3 The UK Border Agency was abolished on 1 April 2013 and its functions were transferred to the core department, as part of the new Visas and Immigration and Immigration Enforcement directorates.
- 4 The Serious Organised Crime Agency (SOCA) and the National Policing Improvement Agency (NPIA) have been abolished. From October 2013, the SOCA and certain operational functions from the NPIA have been subsumed within the National Crime Agency (NCA), a new non-ministerial government department outside the boundary of the departmental group.

1.4 The Department has seen its budget reduced during this parliament. As part of the 2010 Spending Review the Department was required to make a reduction in resource spending of 23 per cent by 2014-15 in real terms, based on the 2010-11 outturn.⁴ As part of the 2013 Spending Round the Department committed to further cuts in real terms of 6.1 per cent in resource spending between 2014-15 and 2015-16.⁵ Resource spending represents most of the Department's budget, at £9.6 billion in 2012-13, mainly covering grants such as those to the police and staff costs.⁶ The Department also has a small capital budget, mainly covering purchases of assets and capital support to local government, which was £0.4 billion in 2012-13.

Sustainable development impacts

1.5 The Department has a good understanding of its sustainability impacts. Before our review its sustainability team had carried out a number of pieces of analysis to inform priorities for embedding sustainable development. We worked with the Department to develop and present this analysis in the form of a matrix (**Figure 3** on pages 13 to 15).

1.6 The matrix highlights the significance of the Department's contribution to the social aspect of sustainability, but also shows that it has influence over a large environmental footprint. The Department's core work on crime and policing and on immigration can make a strong contribution to the government's sustainable development indicator on social capital. One of the four measures making up this indicator is the proportion of people agreeing that people in their neighbourhood can be trusted.⁷ The Department's other operations, policies and procurement can also affect sustainable development indicators on greenhouse gas emissions, natural resource use and water use; and the Department's role in tackling international wildlife crime contributes to the UK's biodiversity impacts overseas.

⁴ HM Treasury, *Spending Review 2010*, Cm 7942, October 2010, p. 10.

⁵ HM Treasury, *Spending Round 2013*, Cm 8639, June 2013, p. 10.

⁶ Note that the Department's resource budget is not derived on exactly the same basis as the net expenditure figure in note 1 of Figure 2, hence the small discrepancy between the two; the Department did not breach its resource budget in 2012-13.

⁷ Department for Environment, Food & Rural Affairs, *Sustainable Development Indicators*, July 2013.

Figure 3

Departmental sustainability impacts

Economic and social impacts¹

Key aspects of the Department's work which impact on sustainable development

Policy

The Crime and Policing Group (part of the core department) is responsible for:

- Supporting business by cutting crime
- Supporting visible, responsive and accountable policing by empowering the public and freeing up the police to fight crime

The core department is responsible for issuing UK visas, and for policy on immigration and immigration enforcement. The Department's approach to immigration is informed by forecasts of migration patterns. Significant changes in climate are one issue that could affect migration patterns

The core department, through the Border Force, is responsible for protecting the UK's borders

Potential impact on sustainable development

The Department's work impacts on economic growth and public safety

The Department's immigration policy and its approach to immigration enforcement have implications for social cohesion and the growth of the UK economy, as well as directly affecting the well-being of immigrants and those seeking asylum

Reducing the trade in illicit goods protects tax revenues, undermines organised criminality, and prevents the social harm associated with illicit goods such as drugs and non-duty paid tobacco products

Examples of how the Department has sought to promote positive impacts or mitigate impacts through its policies

The Department has:

- Established police and crime commissioners
- Developed a new police website, intended to be more accessible and informative
- Set up an independent National Crime Agency

The Department seeks to deliver an immigration system that is fair, serves Britain's interests and commands public confidence

In 2013 the Department developed a new immigration enforcement strategy intended to:

- Remove incentives for people who stay illegally
- Target the criminality that supports illegal immigration
- Effectively manage high harm individuals to reduce risk to the public
- Continue to increase the number of individuals removed

Border Force has, during 2013, refocused its strategic objectives to include:

- To deter and prevent individuals and goods that would harm the national interest from entering the UK in partnership with CITES
- To facilitate the legitimate movement of individuals and trade to and from the UK

Note

¹ Note that initiatives by organisations within the departmental group to promote the environmental sustainability of their operations are covered in the next table.

Figure 3 *continued*
 Departmental sustainability impacts

Economic and social impacts¹

Key aspects of the Department’s work which impact on sustainable development

Potential impact on sustainable development

Examples of how the Department has sought to promote positive impacts or mitigate impacts through its policies

Policy
continued

The Office for Security and Counter-Terrorism (part of the core department) is responsible for protecting the public from terrorism

The Department’s work impacts on economic growth and public safety

The Office for Security and Counter-Terrorism is responsible for working with others to deliver the UK’s 2011 counter-terrorism strategy (known as CONTEST)

The core department through the Centre for Applied Science and Technology (CAST) is responsible for:

- Promoting UK security business
- Developing technological solutions to fight crime

Examples include:

- Assessing alternatives to firearms for the UK law enforcement community, such as acoustic devices
- Leading the development of technical standards to help manufacturers and installers of CCTV systems to develop cameras and recording systems that are fit for purpose

HM Passport Office (part of the departmental group) is responsible for issuing UK passports

Actions taken to promote economic and social sustainability of the passport service include provision for video interviews and promotion of internet applications, in order to make the service accessible to those in rural parts of the country

The Disclosure and Barring Service (DBS) (part of the departmental group) is responsible for mitigating harm caused by inappropriate people working with vulnerable children and adults

DBS seeks to enable organisations to make better informed, safer recruitment decisions, by providing them with information to enable them to determine whether candidates are unsuitable or unable to undertake certain work; particularly with occupations involving regular contact with vulnerable groups. It is responsible for:

- Processing requests for criminal records checks
- Deciding whether it is appropriate for a person to be placed on or removed from a barred list

Procurement

Proportion of small and medium-sized enterprises (SMEs) in the departmental group’s outsourced goods and services

The government considers SMEs to be critical to the UK economy and economic growth

The Department has a target to source 15 per cent of its outsourced goods and services to SMEs by 2014-15, which it is exceeding, and a further target of 25 per cent by 2016-17

Note

¹ Note that initiatives by organisations within the departmental group to promote the environmental sustainability of their operations are covered in the next table.

Figure 3 continued

Departmental sustainability impacts

Environmental impacts

Key aspects of the Department's work which impact on sustainable development	Potential impact on sustainable development	Examples of how the Department has sought to promote positive impacts or mitigate impacts through its policies
<p>Operations</p> <p>The departmental group's built estate: greenhouse gas emissions from energy use associated with electricity use (mainly for lighting and IT equipment), heating, generation of waste, use of water</p> <p>Travel by the departmental group's staff, including emissions associated with vehicles owned by the Department (such as the Border Force fleet)</p>	<p>Contribution to:</p> <ul style="list-style-type: none"> ● Climate change ● Pressure on landfill ● Water scarcity <p>Government efforts to reduce its own impact act as an exemplar to the rest of society, while poor progress can undermine wider environmental policies</p>	<p>Greening government commitment targets</p> <p>Estate consolidation</p> <p>Use of payment by results in facilities management contract</p> <p>Greening government commitment targets</p> <p>Introduction of video conferencing facilities</p>
<p>Procurement</p> <p>The departmental group's outsourced goods and services: including server rooms for IT, and accommodation and services for asylum seekers</p> <p>The Department's influence over police procurement</p>	<p>The Department estimates that the carbon footprint of its supply chain may be around ten times the emissions associated with its built estate and business travel combined, of which asylum accommodation and services may constitute around 5 per cent</p> <p>The Department has begun to estimate the carbon footprint of police procurement as part of its work on the carbon cost of crime. Police forces procured goods and services to the value of some £2 billion in 2011-12</p>	<p>Green specifications in contracts</p> <p>Use of the CAESER tool to understand and manage supplier impacts (note this covers economic and social as well as environmental impacts)</p> <p>Assessment against ICT Maturity model and progress against action plan for improvements, particularly the development of a new business case approval process within the Department</p> <p>Sustainability clauses in mandatory national frameworks</p>
<p>Policy</p> <p>The departmental group's role in working with police authorities and local communities to reduce crime. This affects the greenhouse gas emissions associated with replacement of stolen goods, prison, and transport to and from crime scenes by emergency vehicles</p> <p>The Department's role in tackling environmental crime</p>	<p>The Department estimates that the carbon cost of crime may be some 80 times the emissions associated with its built estate and business travel combined</p> <p>Reduce trade in endangered species, indirectly helping to conserve them</p>	<p>Instigated research on carbon cost of crime with strategic partners</p>

Source: Home Office and National Audit Office

Sustainable development objectives

1.7 The Department has set itself objectives in its business plan that contribute to sustainable development through its core social and economic objectives: to defend the country against terrorism, secure the UK's borders, and control immigration; and through work to enable the police and local communities to reduce crime.

1.8 The Department also recognises and sets targets on important aspects of its contribution to environmental sustainability in its business plan and its sustainability report. The Department has set targets for the environmental performance of its estates and operations as part of the government-wide greening government commitments. In its latest business plan, for 2013–2015, it has also highlighted the importance of implementing the Cabinet Office's greening government ICT strategy, and the need to better understand the carbon emissions associated with crime (**Figure 4**).

Figure 4

Extract from the Department's business plan: The Department's contribution to sustainable development

The Home Office helps to contribute to a secure society by defending the country against terrorism, securing our borders and controlling immigration, enabling the police and local communities to step up the fight against crime and antisocial behaviour. Efficiency and sustainability play a key role in our decision-making, in delivering services to the public and in our use of shared corporate services across the Department. This includes:

- Assess and manage environmental, social and economic impacts and opportunities in its policy development and decision-making.
- Implement the department's plan to deliver on the Greening Government Commitments, supplying quarterly information and contributing to an annual report on progress.
- Procure from small businesses with the aspiration that 25 per cent of contracts should be awarded to SMEs.

Main policies with the greatest opportunity to deliver on Sustainable Development include:

- Collecting an evidence base which will help policy-makers consider the carbon costs and benefits of new initiatives – such as our designing out crime work-streams. One example of this is a research project conducted jointly with Association of Chief Police Officers, which will allow us to estimate the carbon costs of crime and set them against the carbon costs of our initiatives.
- The Forum for Innovation in Crime Prevention provides opportunities for external experts from business, industry and academia to work with the Home Office to help find solutions to potential or persistent crime problems.
- The Tilley awards recognise innovative crime fighting projects where police, community groups and the public successfully work together to identify and tackle local crime problems, supporting all three pillars of sustainability.
- Delivering the Greening Government Commitments and the Greening Government ICT Strategy; work to improve sustainability in the supply chain through our supplier assessment tool; and other actions to embed sustainability into operations and procurement decisions.
- The Home Office has embedded into its policy development process the requirement for officials to assess the social, economic and environmental impacts of its policies. Policy officials are required to conduct impact assessments which look at these important areas at key stages of policy development and implementation. The Home Office has also appointed a contact to provide support to policy-makers on sustainability issues.

1.9 The Department's business plan does not explicitly cover the Department's role and the actions it is already taking in:

- influencing the environmental performance of the police estate and police procurement decisions;
- improving the sustainability of asylum accommodation and services; and
- tackling wildlife crime, although this is mentioned in the Department's sustainability report.

Accountability and decision-making

1.10 As the Department's sustainability report sets out, it has established clear governance arrangements for sustainability (**Figure 5** overleaf).⁸ The responsibilities of the Parliamentary Under Secretary of State for Criminal Information, Lord Taylor of Holbeach CBE⁹ and the Minister of State for Crime Prevention, Norman Baker MP¹⁰ include sustainability and environmental issues.

1.11 The Department has a senior champion for sustainability. Until September 2012, this role was held by a director general who reported directly to the Permanent Secretary. Following a number of changes to senior management structures and changes in personnel, the role is now held by the Director of Finance and Estates who reports to the Chief Operating Office who in turn reports to the Permanent Secretary. The current sustainability champion does not have any formally defined sustainability objectives. His main sustainability responsibilities to date have been to oversee the production of the Department's sustainability report, and to oversee the inclusion of sustainability in a refresh of the Department's estates strategy. The current incumbent will leave the Department in March 2014 and a successor has not yet been appointed.

1.12 Day to day sustainability leadership and direction is provided by a dedicated sustainable development team, which reports to a sustainability committee of officials from across the departmental group on a quarterly basis (Figure 5). The team provides direction and management to the core department and to the Department's arm's-length bodies. There are clearly defined sustainability-related objectives for key staff including the Head of Sustainability and the Head of Unit – Home Office General Property.

1.13 In late 2012 the Department expanded its governance arrangements to cover sustainability in policymaking as well as operational matters. It appointed an individual to take the lead on ensuring sustainable development principles are considered in policymaking. This individual attends meetings of the sustainability committee but meetings to date have focused on the group's stated purpose to ensure that action is taken to meet the greening government commitments.

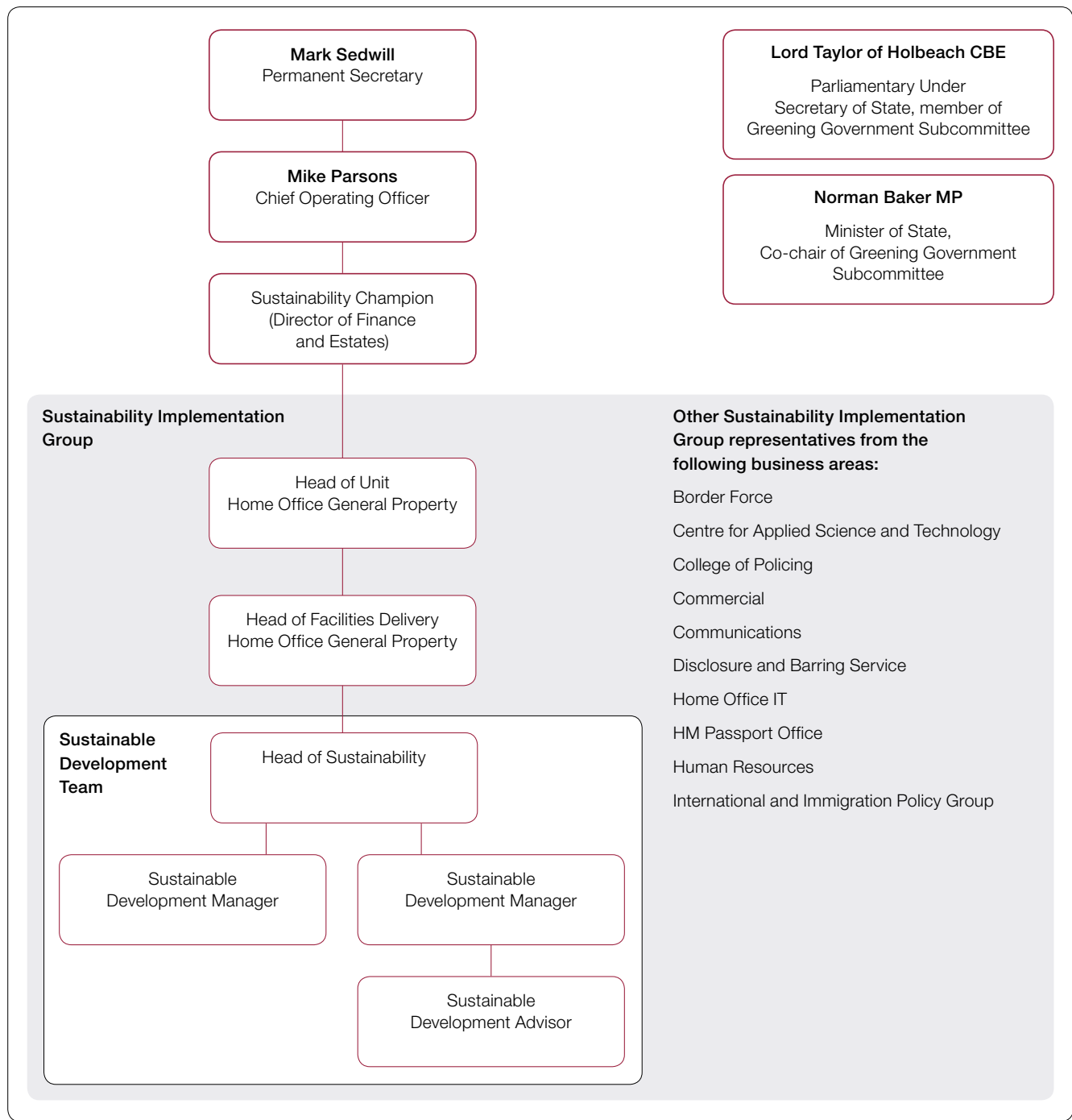
⁸ Home Office, *Sustainability report 2012-13*, October 2013.

⁹ Available at: www.gov.uk/government/people/lord-taylor-of-holbeach

¹⁰ Available at: www.gov.uk/government/ministers/minister-of-state--21

Figure 5

The Department’s sustainability governance structure in 2013-14



Source: Home Office

1.14 The Department has reported that it has embedded sustainability into staff competencies. The sustainable development team told us that the Department had done this by introducing the Civil Service Competency Framework 2012–2017, which is made up of ten competencies, of which six explicitly refer to sustainability.¹¹

1.15 The Department's improvement plan published in February 2014 does not explicitly refer to environmental sustainability.¹² Departmental improvement plans set out what departments will do to ensure their long-term health and success and are designed to be a useful tool to help them focus on priorities for improvement. All government departments are expected to publish their first improvement plans by April 2014. The core themes in the plan are linked to the economic and social aspects of the Department's business plan commitments and major projects. The plan recognises that a refreshed estates strategy can result in savings, though the nature of these savings and their potential to reduce environmental impacts is not detailed.

1.16 The extent of non-executive challenge on sustainability is not clear. The Department's supervisory board, chaired by the Secretary of State and consisting of ministers, officials and non-executive directors, is responsible for approving the Department's Annual Report and Accounts, which contain information about sustainability performance. The minutes of the supervisory board meetings do not record whether sustainability was discussed.

Staff engagement

1.17 The Department's sustainability report includes some innovative examples of how the Department has sought to engage its staff on sustainability issues. Since 2010, all government departments have been required to install real-time displays of energy consumption in their headquarters. The Department goes beyond this minimum requirement through its live online viewer, which can display data collected from electricity, gas and water meters in its headquarters and 11 other buildings used by the departmental group. The online viewer includes several features such as a site league chart to facilitate comparisons between sites.¹³

¹¹ The framework identifies effective behaviours such having a sustainable mindset, delivering more sustainable outcomes, and growing sustainable capability as contributing to six of the ten competencies. *Civil service competency framework*, July 2012. Available at: www.civilservice.gov.uk/wp-content/uploads/2012/07/Civil-Service-Competency-Framework-July-2012.pdf

¹² Home Office, *Home Office Improvement Plan*, February 2014.

¹³ Available at: <http://webview2.ecodriver.net/HomeOffice/>

1.18 There is a range of sustainability material on the Department's intranet, including guides produced by the Department on energy efficiency for facilities managers and on ICT green working focusing on power saving and printing. There are links to a carbon pledge and other external websites. While there is no mandatory sustainability training for all staff, there is a voluntary 45 minute online training module. However, this course was devised in 2011 and it has not been updated since. Only 72 staff have taken this course when in 2012-13, the Department had over 30,000 staff. The Department has contributed to the design of a cross-government online training course on sustainability, which the Department for Environment, Food & Rural Affairs (Defra) expects to launch in spring 2014. The Department participated in Climate Week for the fourth consecutive year in 2014, with events including sustainability workshops across its estate.

Sustainability monitoring and reporting

1.19 The Department actively monitors its progress in reducing the environmental impact of its estate. The sustainable development team produces quarterly sustainability updates to the sustainability committee (the sustainable implementation group, see figure 5 on page 18), and half-yearly updates to senior management and Lord Taylor, the Minister with responsibility for sustainability. The Department's sustainability committee focuses mainly but not exclusively on risks in meeting greening government commitment target risk areas and actions to address progress. The committee has spent some time discussing procurement, but has spent limited time focusing on embedding sustainability into policymaking.

1.20 The Department has complied with annual reporting requirements and in October 2013 also published its first separate sustainability report. This is a thorough and transparent report which complies with the HM Treasury sustainability reporting requirements. The report's strengths include the clear descriptions of the Department's sustainability governance structure, its engagement with its staff and its engagement with its supply chain. Additionally, the Department's 2012-13 emissions data have been externally verified by the Carbon Trust.

1.21 The Department's report includes its sustainable development objectives and illustrative case studies, but could include more on how sustainability has been incorporated into better informed policymaking and decision-making. The Department has commissioned work to develop a better understanding of the environmental footprint of asylum accommodation and services and aims to include data on these in its internal and external reporting in due course.

Part Two

Sustainable policies and policymaking

Introduction

2.1 This part of the briefing considers how the Home Office (the Department) embeds sustainable development considerations within policymaking. It sets out:

- how the Department seeks to fulfil central guidance which requires departments to take account in policymaking of sustainable development and environmental impacts;
- a case study illustrating the extent to which sustainability considerations have influenced policymaking in crime and policing; and
- a case study illustrating the Department's performance in implementing a key policy intended to make a positive contribution to sustainable development – its enforcement of the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES).

Policy development and appraisal

2.2 Key requirements on departments relating to policy development and appraisal are set out in previous National Audit Office briefings for the Environmental Audit Committee (the Committee).¹⁴ They include guidance on:

- **Appraisal:** The Treasury's Green Book sets out how departments should carry out appraisals of policy and take account of wider sustainable development impacts, and is supported by a wide range of supplementary guidance including an impact assessment toolkit.
- **Evaluation:** The Treasury guidance also specifies how departments should conduct retrospective evaluations of the impact of their policies.
- **Reporting:** Government guidance requires departments to report progress in addressing sustainable development in their policy appraisals.

¹⁴ National Audit Office, *Appraisal and sustainable development*, July 2012.

2.3 The Department seeks to fulfil these requirements by following the Treasury guidance and using the toolkit. It directs policymaking staff to the guidance on impact assessments in the better regulation framework manual. The Department also publishes internal guidance on undertaking consultations to elicit views and opinions on policy proposals. Recent impact assessments that have included explicit consideration of sustainability issues include a January 2014 impact assessment on a proposal to ban the below cost selling of alcohol, which considered social impacts in terms of the potential impact on health and well-being and low-income households. We noted in Part One that the Department had appointed an individual to take the lead on ensuring sustainable development principles are considered in policymaking. This individual also has a role in reporting, contributing to the Department's Annual Report and cross-Whitehall reports.

Crime and policing

2.4 In order to explore in more detail how the Department addresses sustainable development impacts within the policymaking process, we explored one of the Department's key policy areas – crime and policing. We considered the introduction of police and crime commissioners, the Department's work on the carbon cost of crime, and the Department's work to design out crime.

Police and crime commissioners

2.5 In a significant change to accountability arrangements for policing, police authorities were replaced by elected police and crime commissioners (PCCs) in 41 of the 43 police force areas across England and Wales in 2012. There are different arrangements for the Metropolitan Police Service and City of London Police.¹⁵

2.6 PCCs are democratically accountable locally for policing and crime reduction, and the Department therefore considers that they are responsible for their forces' sustainability impacts. One of the aims of the policy of introducing PCCs was to provide greater local autonomy in policing, and commissioners are responsible for how money is spent in their force area. However, the Department's Accounting Officer is still accountable to Parliament for the funds given to police forces. The Department published an Accountability System Statement for Policing and Crime Reduction which sets out how PCCs' accountabilities interact with those of the Department's Accounting Officer. The role of the Department is to oversee this overall system of accountability and ensure it is working effectively, rather than scrutinise the PCCs directly.

2.7 The Department has not set any requirements for PCCs or police forces to publish environmental sustainability data as part of this system of accountability. The Department has specified 36 separate pieces of information for PCCs to publish to help the public hold them to account. These include budget, staffing and salary data, but not carbon emissions, waste or water use.

¹⁵ Comptroller and Auditor General, *Police accountability: Landscape review*, Session 2012-13, HC 963, National Audit Office, January 2014.

2.8 In line with its aim of increasing local autonomy, the Department has not issued any formal guidance on sustainability to PCCs or police forces. The Department has however recognised that it can have an influence over the sustainability agenda within the police and to that effect has a representative in the National Police Estates Group. The group's environment team consists of 40 member forces from across the UK and meets quarterly. It is led by an elected chair, and its strategic objectives include enhancing and sharing expertise and good practice, and raising the profile of environmental and sustainability issues. The team has created an environment charter that police forces will be given the opportunity to sign up to in 2014, enabling them to formally recognise that they "have an impact on the environment through critical operational and non-operational activities" and to acknowledge that they "have a responsibility to aim to reduce detrimental impacts on the local and global environment ... by promoting environmental best practice and signing up" to a series of aspirations including reducing energy consumption, managing waste and considering the environmental commitment of suppliers and contractors.

2.9 The Department has also provided advice to a number of police forces on building design, including on sustainability. A review of good design in police buildings, published by the Department in September 2013, includes examples of features designed to improve sustainability, including ground source heat pumps and rainwater harvesting.¹⁶

The carbon cost of crime

2.10 The Department in its sustainability report states that it is seeking to develop estimates of the carbon cost of crime. The Department has two main objectives for this work: first to ensure that business cases for investment in crime prevention recognise the potential environmental, as well as social and economic benefits; and second to identify potential 'hotspots' where the largest amounts of carbon are being emitted, and so to be able to prioritise efforts to reduce carbon emissions accordingly.

2.11 A 2009 research paper funded by the Association of Chief Police Officers Secured by Design estimated that the carbon cost of crime in England and Wales was around 1 per cent of the UK's annual carbon emissions.¹⁷ The assumptions used in this original analysis were relatively crude, but served to give an order of magnitude, and highlighted that the carbon cost of crime was potentially a significant issue. The original research translated an analysis of the financial cost of crime into a carbon cost by using a formula from the International Energy Agency that estimates that every £1,000 of goods and services yields 1 tonne of emitted CO₂.¹⁸ The Department is supporting further development of this research in collaboration with the University of Surrey and the Association of Chief Police Officers Secured by Design.

¹⁶ Home Office, *Better Police Buildings*, September 2013. Available at: www.vburbandesign.com/uploads/3/0/4/2/3042581/designing_better_police_buildings_v16_17_09_13.pdf

¹⁷ K Pease, *The carbon cost of crime and its implications*, July 2009.

¹⁸ The costs of crime factored into the calculation were: value of property stolen; value of property damaged, destroyed or recovered and hence the value of property needing to be replaced; victim services, health services and the costs of the criminal justice system.

Designing out crime

2.12 The Department's work on crime reduction also includes initiatives to 'design out' crime and so discourage criminal activity by making it more difficult or less appealing. The Department does not have an overarching strategy for designing out crime, but instead sees it as a key part of the wider crime prevention effort. Recent examples include working with mobile phone manufacturers and networks to reduce mobile phone theft, and working with the scrap metal industry to 'design out' metal theft, by introducing a redesigned licensing regime for dealers alongside legislation banning cash payment for scrap metal and requiring identity checks of sellers.

2.13 The Department's sustainability report states that the principle of designing out crime underpins the Forum for Innovation in Crime Prevention. This advisory group does not have a budget for funding research and development but seeks to bring together experts from science, design, technology, business, as well as policing and law enforcement to identify solutions to potential or persistent crime problems.

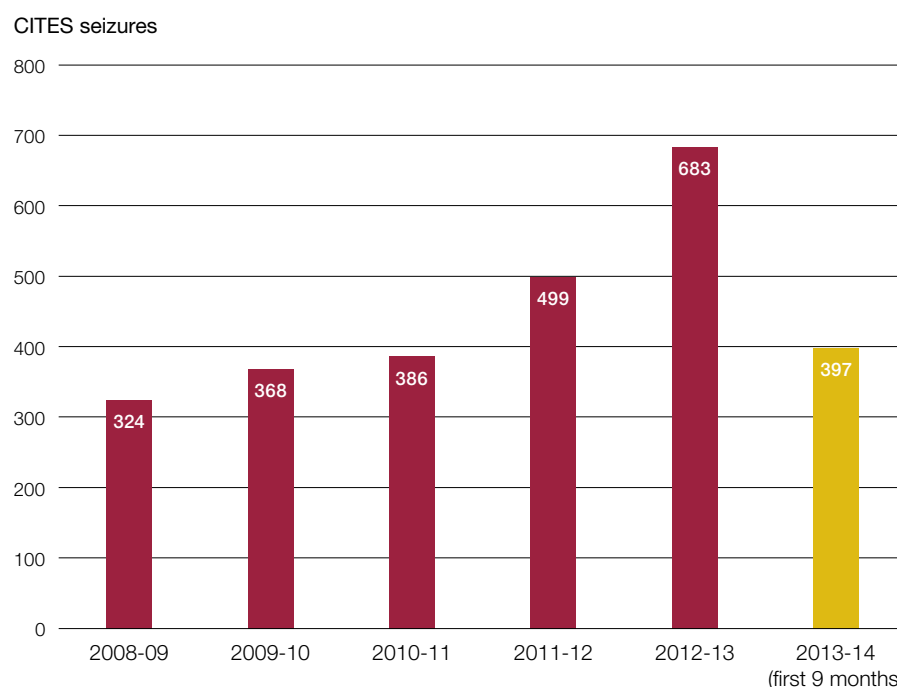
2.14 The Department's sustainability report and business plan objectives for sustainable development also highlight the role of the Tilley awards, which reward partnership problem-solving approaches to crime reduction in several different categories including designing out crime. The awards were last held in December 2012, and officials are considering how the future format and focus of the scheme could reflect subsequent changes to the policing landscape.

CITES

2.15 Border Force, a law enforcement command of the Department, is the principal enforcement authority in the UK for CITES as implemented by current EU Wildlife Trade Regulations. The convention aims to ensure that international trade in specimens of wild animals and plants does not threaten their survival. It entered into force in 1975. Border Force is responsible for carrying out regulatory checks on goods listed under the EU 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. Enforcement action can include seizure of the goods and referral for prosecution. In enforcing the Convention, Border Force works with HM Revenue and Customs, the National Wildlife Crime Unit (part funded by the Department), 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.

2.16 Border Force has increased steadily its seizures of CITES-listed goods between 2008-09 and 2012-13 (**Figure 6**). Data for the first nine months of 2013-14 suggest the rate of seizures has fallen this year. This is largely because the CITES and EU listings were amended in 2013-14 and these changes exempted most of the agarwood parts and derivatives previously seized by Border Force from the CITES controls. Agarwood had accounted for over 220 seizures in 2012-13. Border Force does not have targets for seizures of CITES-listed goods, but it aims to improve on its performance in the previous year. The loss of a few experienced staff also had an impact on seizure rates at two ports.

Figure 6
CITES seizures by year



Note

- 1 These are total numbers of seizures. An individual seizure involves the seizure of a number of items. The total numbers of seized items do not show a similar pattern of increase as the vast majority of items seized tend to be traditional medicines containing parts or derivatives of endangered species, and the numbers seized vary considerably from year to year. The weight of seizures by category in some cases may therefore be a more useful measure. The ivory trade has been recognised as a grave concern by the Environmental Audit Committee. Ivory seizures have increased both in number and in weight from around 2.2 kg in 2009-10 to 80.7 kg in 2012-13.

Source: Home Office and www.publications.parliament.uk/pa/cm201213/cmselect/cmenvaud/140/140we12.htm

2.17 Without an estimate of undetected activity over this period it is difficult to judge performance as increased seizures could indicate improved detection or a growing problem. The Department told us its intelligence does not suggest a growing problem.

2.18 Between January 2009 and September 2013 there were 41 prosecutions relating to CITES following either police or Border Force detections. There were between 6 and 11 prosecutions in each year from 2009 to 2012, and 8 prosecutions in the first nine months of 2013.¹⁹

2.19 In 2012 a report by the Environmental Audit Committee on government progress in tackling wildlife crime included recommendations relevant to the Department's role in enforcing CITES.²⁰ These concerned stability of funding for the National Wildlife Crime Unit, which is part funded by the Department, reporting from police forces on wildlife crime and the importance of the issue for police and crime commissioners. In February 2014 the government announced that it would fund the National Wildlife Crime Unit until 2016. The Department considers that instructing all police forces to submit incident data to the National Wildlife Crime Unit would be disproportionate and inconsistent with the principle of elected police and crime commissioners.²¹

2.20 We spoke to the Border Force team responsible for CITES about how the challenges they face have evolved since the Environmental Audit Committee's review. Border Force told us that:

- The specialist CITES team in Border Force had not been directly affected by the need to make efficiency savings. It had increased from eight officers to nine in 2013-14.
- The changing nature of the trade remained a challenge. There is a trend towards derivative products rather than live specimens; for example beauty products containing extracts from endangered species. These are often more difficult to identify. Criminals are also increasingly sophisticated in how they conceal consignments.
- The CITES core team in Border Force has devoted particular attention to building expertise across the organisation and sharing knowledge with overseas partners. This has included a week-long training course on CITES for Border Force officers which runs at least twice a year and is also made available to the police. Border Force has also produced training manuals for the World Customs Organisation.

¹⁹ *Hansard HC*, 24 February 2014, vol. 576, cols 38W–39W.

²⁰ HC Environmental Audit Committee, *Wildlife Crime*, Third Report of Session 2012-13, HC 140, October 2012.

²¹ HC Environmental Audit Committee, *Wildlife Crime: Government Response to the Committee's Third Report of Session 2012-13*, Fourth Special Report of Session 2012-13, HC 1061, March 2013.

Part Three

Sustainable operations

Introduction

3.1 Central government guidance requires each department to include within its Annual Report and Accounts a sustainability report covering the operational performance of its core and arm's-length bodies. Departments are also required to report to Department for Environment, Food & Rural Affairs (Defra) on performance against the greening government commitments targets, enabling Defra to produce an annual report.²²

This part of the briefing:

- examines the operational performance of the departmental group in 2012-13 against greening government commitments;
- compares the performance of the departmental group with that of central government departments more generally in 2012-13;
- outlines the sustainability impact of the Department's ICT, as this accounts for a significant proportion of the Department's emissions; and
- examines the Department's progress against its 2011 climate change adaptation plan, as there was no requirement in 2012-13 for departments to update or report against their adaptation plans.

Operational performance in 2012-13

3.2 The Department reports on its performance against the greening government commitments in its sustainability report. In 2012-13, the departmental group met two of the five targets set for 2015 in the greening government commitments, namely water use and paper use. It was also making good progress against its waste targets. The Department's fifth target is for overall carbon emissions, which were 18 per cent below the 2009-10 baseline in 2012-13, despite slightly increasing from 2011-12 due to extended building use during the Olympics, poorer weather during the year, and an increase in the Department's use of domestic flights. In **Figure 7** overleaf we summarise the Department's progress against targets.

²² For further information on central government reporting requirements, see National Audit Office, *Sustainability reporting in government*, December 2012.

Figure 7Group performance against greening government targets¹

	Baseline (2009-10)	Performance (2012-13)	Target reduction (2014-15) (%)	Actual reduction (2012-13) (%)	Already met target?
Carbon emissions ² (tCO ₂ e)	86,171	70,568	25	18	No
Water use (m ³)	346,604	240,968	N/A ³	30	Yes
Waste (tonnes)	5,243	4,026	25	23	No
Paper (A4 reams)	398,001	267,461	N/A ⁴	33	Yes
Domestic flights (numbers)	19,876	16,193	25	19	No

Notes

- 1 The table presents consolidated performance for the departmental group.
- 2 The greening government commitments do not require departments to report international air travel emissions. The Department voluntarily reports separate emissions figures including international air travel. Total emissions from travel including international air travel, fell by 12 per cent from 2009-10 to 2011-12 but returned to just above 2009-10 levels in 2012-13.
- 3 For water use, there is no specific percentage target: departments are required to achieve a reduction in use against a 2009-10 baseline and to report on office water use against best practice benchmarks.
- 4 There was a target to cut paper use by 10 per cent by 2011-12.

Source: HM Government, *Greening Government Commitments Annual Report 2012-13*, December 2013. The information included here is in some cases based on more recent data than that in the Department's sustainability report, and uses a methodology consistent with that used by other government departments.

3.3 The reductions in carbon emissions can be largely attributed to:

- estate consolidation, resulting in the Department's total UK estate falling from over 540,000m² in January 2011 to under 490,000m² in January 2013; and
- innovative use of payment by results in the Department's facilities management contracts, which led to energy savings of over £1.1 million, shared between the Department and its contractors. This is the equivalent of 6,200 tonnes of CO₂ reduced over 2010-11 to 2012-13.

3.4 The Department considers that it will be a challenge to continue to reduce its reported emissions, waste and water use significantly beyond 2014-15. The Department's estate consolidation is largely complete, and the Department considers further energy saving measures such as installation of LED lighting would offer a low return on investment. The Department told us that small reductions in waste can go unnoticed because its reported waste figure is calculated applying standard weight multipliers to the sizes of external bins. Water use at 70 per cent of the Department's buildings was above the good practice benchmark of 6m³ per full-time equivalent staff. The Department told us that the vast majority of its current water use was for essential hygiene, catering, cooling and car washing purposes.

Comparative performance in 2012-13

3.5 By 2012-13, the Department had improved its performance against its baselines by more than central government as a whole in respect of emissions, water use, waste, and paper (**Figure 8**).

3.6 The Department's domestic flights account for a relatively high share of central government's as a whole. This is because the Department has a presence across the UK, with air travel a necessity to some locations such as Northern Ireland. The Department's share was higher in 2012-13 than the previous year or the baseline year which it attributes in part to additional staff travel relating to the Olympic Games.

3.7 The Department has been working to reduce staff travel by rolling out high definition video conferencing across several of its sites, but it is not yet clear whether staff are using video conferencing instead of travelling or as well as travelling. The Department told us it was monitoring how video conferencing was being used and assessing its impact on staff travel. Other initiatives to reduce domestic flights include updating guidance to set out a stronger message on when flights are appropriate, and plans to withdraw the use of government procurement cards for travel.

Figure 8

Group performance against greening government targets

	Department's share of total central government activity (%)	Department's improvement against baseline (%)	Central government's improvement against baseline (%)
Carbon emissions (tCO ₂ e)	2.7	18	14
Water use (m ³)	0.7	30	9
Waste (tonnes)	1.4	23	15
Paper (A4 reams)	4.5	33	26
Domestic flights (numbers)	11	19	30

Source: HM Government, *Greening Government Commitments Annual Report 2012-13*, December 2013

Sustainability impacts of the Department's ICT

3.8 According to an analysis conducted by the Department in 2013, ICT accounts for a significant proportion of the group's carbon emissions.²³ ICT represents around a quarter of the Department's procurement spending (see Part Four).

3.9 In its business plan the Department states that contributing to the greening government ICT strategy is one of the Department's greatest opportunities to deliver on sustainable development. The greening government ICT strategy requirements for monitoring and reporting on ICT are distinct from those under the greening government commitments, though there is an ambition that they align.²⁴ Emissions from off-site server rooms provided by the Department's suppliers are reported to the Cabinet Office under the Green ICT strategy, but such supplier emissions do not count towards the emissions figures for the greening government commitments, reported to Defra. The Green ICT strategy recognises that the resources and energy consumed by ICT generate significant greenhouse gas emissions, but also that ICT has a role in changing the way government provides services, and thus has the potential to achieve environmental improvements on a wider scale.

3.10 The Department was one of seven to meet or exceed a rating of level 3 (on a scale of 1–5) in the Cabinet Office's ICT maturity model by March 2013.²⁵ A key ambition of the Cabinet Office's greening government ICT strategy is that all departments should achieve level 3 by 2015. The maturity model provides a common framework for departments to self-assess sustainability across government in 19 subcategories within the following areas: managing ICT services, managing ICT technology, managing ICT change, and exploiting ICT. The Department's 2012 and 2013 maturity model ratings were peer-reviewed by the Ministry of Justice. The Department scored an average of level 2.3 in its initial assessment in March 2012 and improved to an average level 3.1 in March 2013. The average maturity level across assessed departments was 2.4 in 2012 and 2.9 in 2013.

3.11 The Department scored itself highly on the maturity model on its work to reduce the environmental impacts of support services such as its ICT help desk and ICT training. Other examples of good practice it identified were:

- installing advanced cooling mechanisms, estimated to save around 400 tonnes of CO₂e a year;
- installing more efficient uninterruptable power supplies, estimated to save around 240 tonnes of CO₂e a year; and
- a project to replace between 80 per cent and 90 per cent of its desktop PCs with thin client devices expected to save over 1,500 tonnes of CO₂e a year as these use 80 per cent less energy than existing desktops due to most of the computational work being performed by a server.

²³ The Department is not confident about the precise proportion, as the analysis was based on a number of generic assumptions. The Department intends to refine the assumptions and re-perform the analysis in 2014.

²⁴ HM Government, *Greening Government: ICT Strategy*, March 2011.

²⁵ Cabinet Office, *Greening Government: ICT Annual Report 2013*, July 2013, p. 9.

3.12 The Department's least mature areas (where it rated itself at level 2 or below) were, largely in common with those of other government departments, investment decisions, solution design, information and data, and utilisation. Over 70 per cent of departments were rated below level 3 on investment decisions in 2013; at least 50 per cent of departments rated below level 3 on solution design, and on information and data; and over 30 per cent rated below level 3 on utilisation.²⁶

3.13 As required by the greening government ICT strategy, in 2013 the Department made a plan and undertook actions to address all areas where it had not reached level 3:

- on solution design and investment decisions, the Department has introduced a new business case process which involves an assessment of environmental costs and benefits before approval of investments (see Part Four);
- on information and data, the Department has completed its information asset register and defined retention policies to minimise environmental impacts arising from data storage; and
- on utilisation, the Department plans include introducing power-saving features on desktops and laptops.

Climate change adaptation

3.14 The Department's monitoring and reporting of its resilience to climate change is less well developed than its governance arrangements for promoting, monitoring and reporting on sustainability in its operations and the associated targets set under the greening government commitments. In March 2010, each central government department published an adaptation plan explaining its proposed actions to meet the challenge of a changing climate. The Department updated its plan in 2011, and there has been no requirement to update plans since then.

3.15 The Department has taken steps to identify which of its sites may be affected by climate change and take remedial action. As part of its estate rationalisation programme, the Department analysed in 2011 which of its buildings were at risk from climate change using Defra's climate projections and flood area information. This resulted in a number of actions such as remedial works to a culvert of a building in Leeds. The Department considers adaptation requirements in its estates planning process with the aim of ensuring that as part of any estate improvement work due consideration is given to the future needs of buildings under more extreme weather events. The Department also operates from buildings it does not own directly, such as ports, where it has less influence over mitigation measures, though has procedures to maintain business resilience in the event of these being inaccessible.

3.16 The Department identified in its adaptation plan that climate change could have implications for immigration. The Department co-sponsored a Foresight project to understand the challenges and opportunities presented by any changes to migration patterns as a result of climate change. This research found that the effects of environmental change on migration are potentially significant and could lead to migration decreasing in some scenarios and increasing in others.²⁷ It recommended that policymakers should ensure that any international funding mechanisms for adaptation to environmental change should be developed together with addressing migration issues, and recognise that the cost of inaction is likely to be high.

3.17 The Department also identified in its adaptation plan that climate change could have implications for policing policy. The Department had intended to assess the resilience of the police service to climate change through Audit Commission work. The Department has not taken this strand of work forward following the announcement of the abolition of the Audit Commission and the introduction of new police accountability arrangements.

Part Four

Sustainable procurement

Introduction

4.1 The government has committed to buy more sustainable and efficient products and engage with its suppliers to understand and reduce the impacts of its supply chain.²⁸ Specifically the government has committed to:

- embed the Government Buying Standards²⁹ in departmental and centralised procurement contracts, within the context of government's overarching priorities of value for money and streamlining procurement processes; and
- improve and publish data on supply chain impacts, initially focussing on carbon, but also water and waste; and setting detailed baselines for reducing these impacts.

4.2 The Department for Environment, Food & Rural Affairs (Defra) has reported on progress across government on sustainable procurement in the greening government commitments annual report.³⁰ Defra has adopted a phased approach to improving reporting on supply chain impacts and compliance with the Government Buying Standards. In 2011-12, Defra asked departments to report on contracts entered into for six key product groups: construction, timber, furniture, paper, ICT and vehicles. For 2012-13 it refined the data request and extended it to cover food and catering contracts. Since 2011-12, HM Treasury requirements have also required departments to report on sustainable procurement in their annual reports and accounts.

4.3 This part of the briefing addresses:

- the nature and scale of the Home Office's (the Department's) procurement activities;
- the Department's progress on embedding sustainability within its procurement processes;
- the sustainability of the running of the Department's asylum estate, which it procures from third party providers; and
- police procurement, because while the Department's influence over this is limited, police forces are largely funded by the Department.

²⁸ Department for Environment, Food & Rural Affairs, *Greening Government Commitments: Operations and Procurement*, February 2011.

²⁹ The Government Buying Standards (GBS), developed by Defra, seek to make it easy for procurers to buy products of a high standard by laying down simple technical specifications and award criteria for products to be used in tenders.

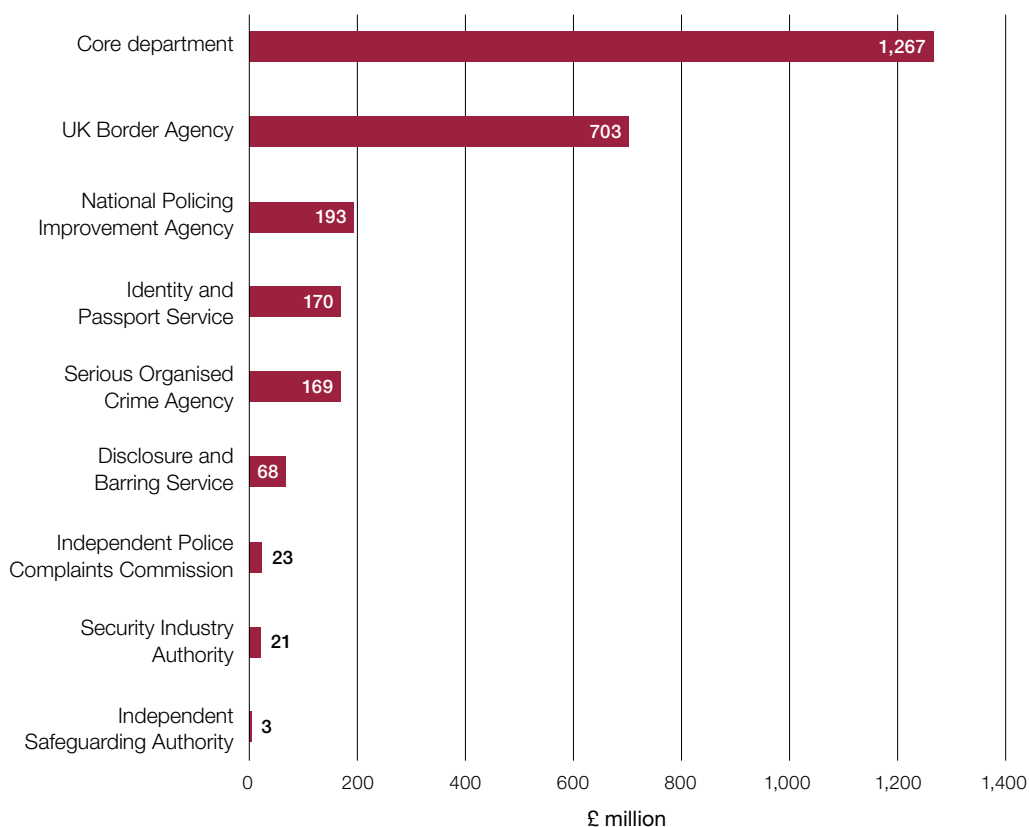
³⁰ HM Government, *Greening Government Commitments Annual Report 2012-13*, December 2013.

The Department's work to green its ICT, its largest area of procurement spend, is covered in Part Three.

The nature and scale of the departmental group's procurement and its environmental footprint

4.4 The departmental group expenditure on procurement amounted to £2.6 billion in 2012-13. The core department and the UK Border Agency (since merged into the core department) accounted for around £2 billion of this (**Figure 9**).

Figure 9
Procurement expenditure by organisation in 2012-13



Notes

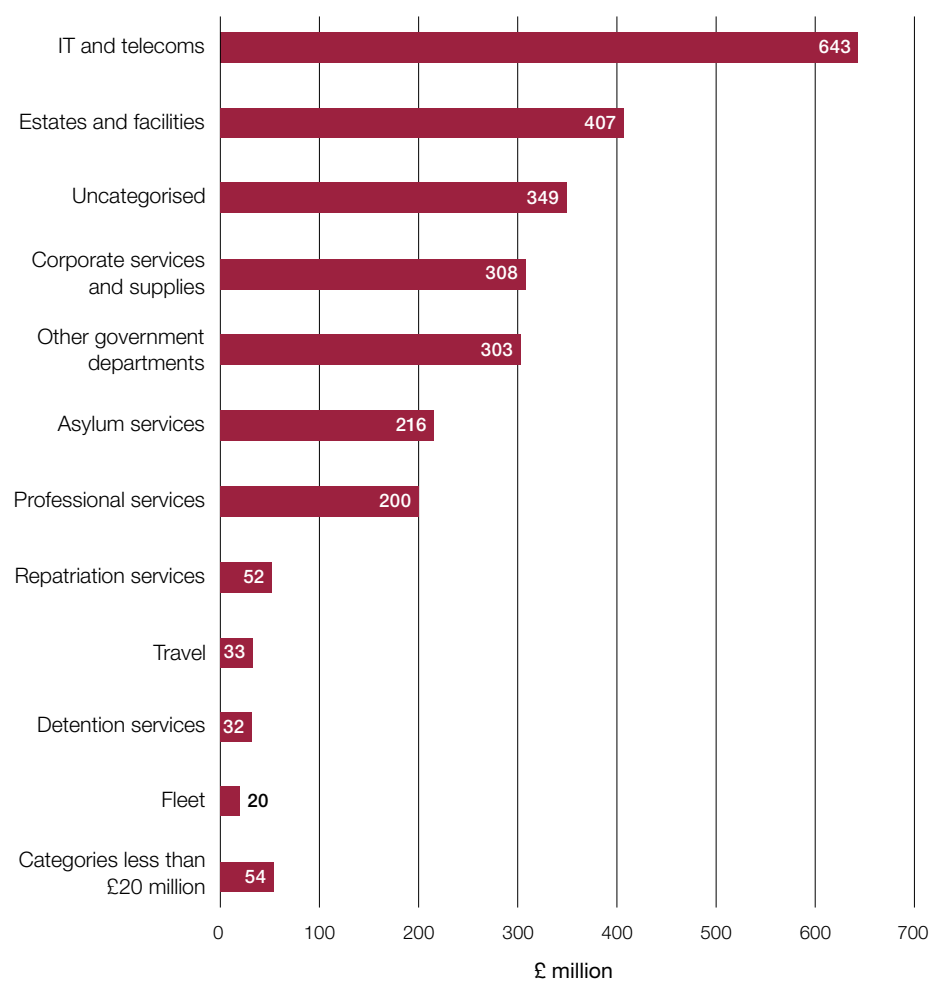
- 1 The UK Border Agency was abolished on 1 April 2013 and its functions were transferred to the core department, as part of the new Visas and Immigration and Immigration Enforcement directorates.
- 2 The Serious Organised Crime Agency (SOCA) and the National Policing Improvement Agency (NPIA) have been abolished. From October 2013, SOCA and certain operational functions from the NPIA have been subsumed within the National Crime Agency (NCA), a new non-ministerial government department outside the boundary of the departmental group.
- 3 The Identity and Passport Service is now known as HM Passport Office.

Source: Home Office

4.5 Approximately 25 per cent of the departmental group's procurement spending was on IT and telecoms, while facilities management expenditure accounted for around 15 per cent (**Figure 10**). Around 13 per cent of expenditure has not been allocated to standard central government procurement categories, making it more difficult for the Department to identify any potential scope to address its sustainability impacts.

Figure 10

Departmental group procurement expenditure by category in 2012-13



Notes

- 1 'Corporate services and supplies' includes radio spend, office supplies and uniforms.
- 2 'Professional services' includes consultancies, interpreters and HR services.

Source: National Audit Office

4.6 The Department has commissioned an analysis to estimate the carbon footprint of its supply chain using a technique known as input–output analysis. Initial results suggest the carbon footprint of the Department’s supply chain is around ten times that associated with energy use on its built estate and business travel. In its sustainability report, the Department discloses data on suppliers’ waste, water and emissions. These figures are based on supplier self-assessments and are obtained through the Corporate Assessment of Environmental, Social and Economic Responsibility (CAESER) tool. However the environmental footprint data that CAESER provides is for a supplier as a whole, not for the proportion attributable to the Department’s activities, and not all suppliers choose to engage with this process. As a result year on year comparisons show significant variances, with reported emissions more than doubling between 2011-12 and 2012-13 (**Figure 11**).

Figure 11
Unapportioned supplier performance data (self-assessed)

Key performance indicator	2011-12	2012-13
Total scope 1 emissions reported by suppliers	2,804,570 metric tonnes (56 suppliers)	3,082,242 metric tonnes (54 suppliers)
Total scope 2 emissions reported by suppliers	9,178,648 metric tonnes (57 suppliers)	6,406,144 metric tonnes (47 suppliers)
Total scope 3 emissions reported by suppliers	29,830,703 metric tonnes (28 suppliers)	77,988,583 metric tonnes (32 suppliers)
Total amount of waste reused reported by suppliers	19,165 tonnes (12 suppliers)	2,436 tonnes (10 suppliers)
Total annual water use reported by suppliers	19,025,840 (m ³) (33 suppliers)	1,324,979,008 (m ³) (32 suppliers)

Notes

- 1 Scope 1 emissions are direct greenhouse gas emissions from sources owned or controlled by the organisation.
- 2 Scope 2 emissions are indirect emissions from electricity purchased by the organisation.
- 3 Scope 3 emissions are other indirect emissions. These are a consequence of the organisation’s actions but occur at sources which are not owned or controlled directly by it and are not classed as scope 2 emissions.
- 4 These show supplier total figures rather than figures that are attributable to activity in support of the Department.

Source: Home Office

Progress on embedding sustainability in procurement processes

4.7 The two main ways the Department aims to embed sustainability in its procurement processes are by inclusion within its business case process and through the use of the CAESER tool to identify and manage risks.

4.8 During 2013-14, the Department is updating its business case guidance to require staff to include information on how the project's carbon footprint, annual power consumption, travel impacts, and waste in business cases for projects will be minimised as well as any positive environmental contributions. The new template and guidance is in pilot and is due to be formally launched in April 2014. Business cases are reviewed by the Portfolio and Investment Committee, a subcommittee of the Home Office Executive Management Board that has responsibility for approving investment in all major programmes and projects across the departmental group. At the time of our review, two business cases had been reviewed and approved as part of a trial using the new templates.

4.9 The Department uses supplier responses to CAESER questionnaires to inform commercial managers of potential environmental and social risks and how these might be mitigated. CAESER provides recommendations to suppliers based on their responses. For example, one supplier was recommended to measure and monitor its greenhouse gas emissions. This supplier provided a written update to the Department via CAESER that it had set environmental goals covering waste and emissions reduction. Information from CAESER shows that in 2011-12, ten of the Department's suppliers stated that they only procure timber or timber products from sources verified as legal and sustainable. This figure increased to 15 in 2012-13. One has since let the Department know of its policy on timber sourcing.

4.10 The Department considers that the leverage it has with its suppliers would be greater the more other departments use CAESER and the more the Cabinet Office's Crown Representatives engage with the tool's outputs. The Department was one of the earliest to use CAESER, and led a departmental user group to help develop the tool, but its use is not widespread. The Cabinet Office expects to soon roll out a tool to all departments, via the Sid4Gov portal, in order to help provide data on carbon emissions, waste generation and water consumption across key suppliers, in line with the greening government commitments.

Asylum estate

4.11 Accommodation and services for asylum seekers and their families while their cases are being processed accounts for 8 per cent of the Department's procurement spend.³¹ In March 2012 the Department signed contracts to provide accommodation and services, known as the COMPASS contracts, with G4S, Serco and Clearel. As noted in Part One, the scope of the Department's sustainability report currently does not extend to asylum accommodation and services. The Department estimates however that the carbon footprint of asylum accommodation and services is, at around 35,000 tonnes, equivalent to more than half of the carbon footprint of the departmental group's built estate.

4.12 The Department's COMPASS contracts include sustainability clauses regarding the impact of providers' own estates. They require the Department and provider to agree a set of sustainability indicators to be documented and monitored, including targets for carbon from offices, energy efficiency, waste arising and water consumption. However, as of February 2014, these indicators had not yet been agreed. The contracts also require the providers to periodically complete a CAESER assessment, which all three providers completed in 2013.

4.13 The contractual quality standards for asylum accommodation stipulate that properties should be safe, habitable and fit for purpose. Properties must also be maintained and serviced in line with the Decent Homes Standards, which include that a property should be insulated to a 'reasonable' level and have a 'reasonably' modern boiler. As we reported in our 2014 investigation into the COMPASS Contracts,³² G4S and Serco took on housing stock without inspecting it and subsequently found that many properties did not meet contractual quality standards. This issue is under commercial review.

4.14 The Department and the accommodation providers have considered taking advantage of energy efficiency schemes such as the Green Deal and ECO, but have not yet made a decision. The Green Deal is designed to help individuals and small businesses make energy efficiency improvements to buildings by allowing them to pay the costs through their energy bills rather than upfront.

Police procurement

4.15 Police forces in England and Wales procure a wide variety of goods and services to support their work, with associated sustainability impacts. These range from energy and water use in buildings, fuel efficiency of police cars, and the recyclability of body armour. At some £2 billion each year, police procurement is of the same order of magnitude as the departmental group's procurement spend. Of this, in 2011-12 the police spent £600 million procuring ICT goods and services, £170 million on buildings and property management, £70 million on commercial vehicles, and £20 million on protective clothing³³

³¹ The services include maintenance of the accommodation, provision of transportation between accommodations, management of antisocial and violent behaviour in the accommodation, and provision of a complaints process.

³² Comptroller and Auditor General, *COMPASS contracts for the provision of accommodation for asylum seekers*, Session 2013-14, HC 880, National Audit Office, January 2014.

³³ Home Office commissioned spend analysis.

4.16 Though legislation has provided for increased local autonomy for policing, the Department has maintained a degree of influence over police procurement. As covered in Part Two, the Department has provided advice to a number of police forces on building design, covering issues including sustainability. In 2011 the Department introduced legislation requiring forces to procure body armour, vehicles and ICT through national frameworks. There are explicit but high-level sustainability requirements included in the vehicles and ICT frameworks but not in the body armour framework. The vehicles framework requires suppliers to be able to demonstrate their commitment to reducing their environmental impacts, to adopt a policy of continuous improvement, and to comply with environmental legislation. The ICT framework requires suppliers to follow sound environmental management policies so that their products or services are procured, produced, packaged, delivered and are capable of being used and disposed of appropriately. The Department is responsible for ensuring suppliers comply with the sustainability requirements in these mandatory frameworks. The Department told us that its police procurement category managers engage with its sustainability team to ensure that suppliers identified within framework agreements comply with ethical and sustainable standards.

4.17 The Department also provides a central police procurement hub, an online marketplace through which forces can procure goods and services. Around 20,000 different goods and services are available via the hub and as at June 2013 just over half of all forces had signed up to use it, though only 16 out of 43 were using it actively. Currently around 2 per cent of spend goes through the hub annually.³⁴ There is no formal process by which the central police procurement hub promotes sustainability in police procurement, but forces can use it to report on spend with small and medium-sized enterprises.

4.18 Most procurement frameworks used by forces are not managed by the Department, but often by an individual police force. The manager of each framework is responsible for monitoring sustainability requirements. Some frameworks are managed through the Crown Commercial Service; in 2011-12 forces spent over £260 million through Crown Commercial Service frameworks.

³⁴ HC Home Affairs Committee, *The work of the Permanent Secretary*, Thirteenth Report of Session 2013-2014, HC 233, January 2014.

Appendix One

National Audit Office best practice criteria

Overall criterion: Is the department fully contributing to the government's sustainable development objectives?

Key question	Areas	Criteria
Are the department's policies and policymaking consistent with sustainable development objectives?	Outcomes	<p>Are the department's policies, programmes and projects in line with UK government objectives?</p> <p>Has the department assessed the wider sustainability impacts of each of its policy responsibilities in order to identify specific priority areas in which to focus its efforts to embed sustainable development?</p> <p>Do the department's Impact Assessments demonstrate understanding and application of sustainable development principles?</p> <p>Does the department conform to HMT Green Book and other sustainability guidance?</p> <p>Does the department have other mechanisms in place to ensure policy development accounts for sustainability?</p> <p>How does the department deal with non-monetary impacts and present these on a common basis?</p> <p>Are policies, programmes and projects achieving sustainable outcomes in line with UK government objectives?</p> <p>Are the department's high-priority policies delivering sustainable outcomes?</p> <p>Are there any unsustainable outcomes arising from any policies, taken either in isolation or interacting together?</p> <p>What impact are the department's policies likely to have on the UK sustainable development indicators?</p>
	Level of ambition	<p>Are the department's policies, programmes and projects in line with the government's sustainable development objectives?</p> <p>Does the department understand the potential for its policy intentions to contribute to the government's sustainable development objectives?</p>

Key question	Areas	Criteria
<p>Is the department managing its estate and operations in a manner consistent with sustainable development objectives?</p>	Outcomes	<p>Has the department reduced the environmental impact of its estate and operations over time? For example:</p> <p>Has the department ensured its ICT operations are as green as possible?</p> <p>Has the department reduced the impacts arising from its estate?</p> <p>Is the department on track to meet its greening government commitments targets?</p> <p>What is it doing to address any shortfalls?</p>
	Level of ambition	<p>Is the department doing as much as it could in absolute terms, recognising that most of the greening government commitments targets are relative? For example:</p> <p>Has the department set any more ambitious internal targets?</p>
<p>Is the department conducting its procurement in a manner consistent with sustainable development objectives?</p>	Outcomes	<p>Is the department reducing the environmental impacts of its procurement activity?</p> <p>Does the department utilise cross-government framework contracts, and how is its choice influenced by sustainability considerations?</p> <p>Where a department procures goods and services for itself, does it ensure that sustainability is fully embedded within procurement decisions?</p>
	Level of ambition	<p>Is the department doing as much as it could to promote sustainability with its suppliers and supply chains? For example:</p> <p>Do the commercial director or head of procurement have any sustainable development responsibilities?</p> <p>Does the department have desk manuals, other guidance documents, or training sessions to promote the consideration of sustainable development in procurement decisions?</p>

Key question	Areas	Criteria
Does the department's governance and leadership promote sustainable development objectives?	Role and responsibilities	<p>Does the department have a clear and explicit understanding of how it can contribute to sustainable development?</p> <p>Is this reflected in a departmental sustainable development strategy, and if not, how is the department's role communicated to staff and stakeholders?</p> <p>Does the department have clear policy and operational objectives, priorities and targets to progress sustainable development?</p> <p>Where relevant, does the department have any targets which relate to the sustainable development performance indicators?</p> <p>Where any departmental objectives conflict with sustainable development objectives, are decisions made over trade-offs with an active consideration of the sustainable development impacts?</p> <p>Are sustainable development objectives embedded in the remits of all the department's agencies and NDPBs?</p>
	Accountability and decision-making	<p>Does the department have mechanisms for ensuring that sustainability is embedded within decision-making processes? For example:</p> <p>Is there an executive board member who is responsible for sustainable development, and if not, who is the most senior official responsible?</p> <p>Are sustainability objectives embedded in the remits of the department's relevant internal boards and committees? Where sustainable development objectives are not embedded, why is this?</p> <p>Are sustainability issues regularly considered by the executive board and other internal committees? Is there a sustainable development unit?</p> <p>Does the department encourage challenge and input on sustainability to policy and operational development across the following three levels:</p> <ul style="list-style-type: none"> ● within the department; ● within government; and ● from stakeholders outside government? <p>Does the department's business plan include any consideration of sustainability objectives?</p>

Key question	Areas	Criteria
	Monitoring and reporting	<p>Does the department monitor its environmental performance (e.g. its carbon and water footprints) in scorecards, business reports etc. and does it have systems and processes in place for accurately reporting on its environmental impacts? (e.g. an environmental management system)?</p> <p>Does the department transparently report on its sustainability impacts in published reports and on its website?</p> <p>Does the department comply with HMT and greening government reporting requirements in relation to sustainable development?</p> <p>If the Department for Environment, Food & Rural Affairs Sustainable Development Unit has raised any issues in its monitoring of progress against the department's business plan, have these been addressed?</p>
	Leadership and staff engagement	<p>Does the department engage with staff on sustainable development objectives? For example:</p> <p>Are there clear responsibilities for championing of sustainable development within the department below board level?</p> <p>Are sustainable development objectives incorporated within induction and training of staff where appropriate?</p> <p>Are sustainable development objectives incorporated within staff performance and appraisal systems?</p> <p>Does the department provide strategic leadership to others in those aspects of sustainable development it can influence?</p>

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