



**Consumer  
Focus**  
Campaigning for a fair deal

# **Draft Sustainable Development Action Plan**

**2010/11**

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# Foreword

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Sustainability is something that should be at the heart of what we are in Consumer Focus.

But what does it actually mean? What do we need to do?

To try to address these questions staff from across the organisation have worked together to develop this Sustainable Development Action Plan (SDAP). I would like to thank each of them personally for their ideas, commitment and patience. The plan sets out our direction of travel and detailed action plans will be drawn up in key areas.

Part of the plan outlines how we intend to work more sustainably. In our first year recycling in the offices has already saved over 218 trees (that's a staggering 3597 reams of paper). We will build on this (in trying to reduce the amount of paper we use and much more!). On 1<sup>st</sup> April 2010 Consumer Focus signed up to the 10:10 campaign committing to aim for a 10 per cent reduction across four key areas of our carbon footprint: grid electricity, on site fossil fuel use, vehicle fuel use and air travel.

Some of the targets in the Plan are about simple things like turning off lights and appliances, printing fewer copies, using cups and glasses instead of paper cups. All of us need to look at the way we work: does it represent the most economical and efficient method? We need to look at the products we buy in: do our suppliers use resources wastefully in the manufacturing process? We also need to look at the meetings we hold: could they be done by teleconferencing, in fact, are they necessary at all? Simple actions, but their cumulative effect would be considerable, saving energy, saving resources, and saving time for us to serve consumers better.

The Plan also sets out how we intend to incorporate sustainability into consumer policy, which is potentially the most meaningful contribution we can make to sustainable development. We identify those projects where we have sought to balance the opportunities and tensions between environmental protection, social and economic development and we have looked at a range of other organisations to learn from the best practice.

I am confident if we all work together to achieve the targets in the Plan it will not only help us to 'harness the appetite of consumers to adopt more sustainable lifestyles' but to adopt that lifestyle ourselves in our daily work.

Maria Battle  
Senior Director – Consumer Focus Wales  
On behalf of Consumer Focus Senior Management Team

# Introduction

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Consumer Focus has a legal duty to exercise its functions in the manner which it considers is best calculated to contribute to the achievement of sustainable development. The Consumer Focus Annual Report for 2008/09 states:

‘Sustainability is central to Consumer Focus policy work and features as one of our four strategic campaign goals: to harness the appetite of consumers to adopt more sustainable lifestyles. We aim to “practice what we preach” by managing our own sustainability footprint.’

Although a new organisation, Consumer Focus is clear that the achievement of sustainable development fits with our core business, activities and objectives. Sustainability is part of the organisation’s vision and strategic goals, Consumer Focus has been working to understand what this means for the organisation in practice.

An SDAP is a plan which sets out an organisation’s contribution to the aims and objectives of the UK Sustainable Development Strategy, ‘Securing the Future’. Consumer Focus has identified two channels for its contribution to sustainable development: its development of consumer policy and its operations (including its people and procurement). Some aspects of these channels are more developed than others, and we aim to bring them together in a Sustainable Development Strategy that explains how Consumer Focus addresses the tensions between economic development, social development and environmental protection, and between current and future consumers.

Our strategy is set out here in our first SDAP, for 2010/11, which has been developed using guidance from the Sustainable Development Commission, with cross-cutting input from staff at all levels. This is now a living document which we want to develop by achieving and reporting success, learning from others and demonstrating leadership in our core business. The delivery of the Action Plan will underpin the development and delivery of Consumer Focus’s future work plans.

# What sustainable development means for Consumer Focus

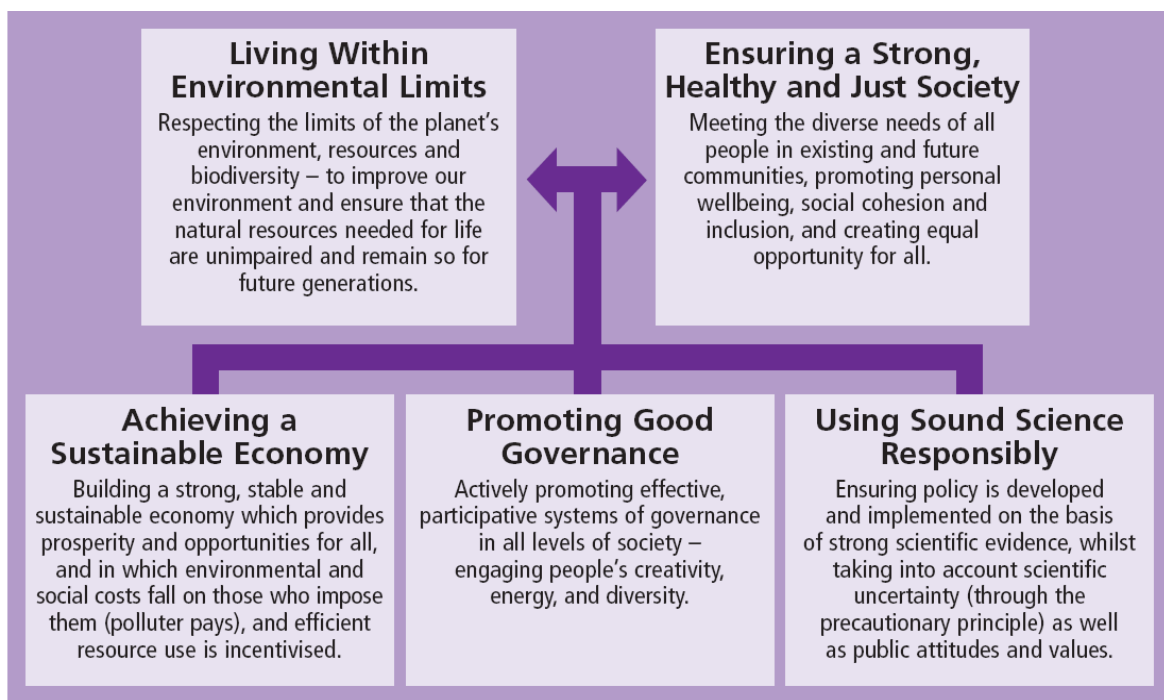
## What is sustainable development?

The UK Government Sustainable Development Strategy 'Securing the Future' (March 2005) sets out a common sustainable development (SD) goal agreed by governments across the UK:

*'to enable all people throughout the world to satisfy their basic needs and enjoy a better quality of life, without compromising the quality of life for future generations.'*

## Relevance to Consumer Focus

The UK strategy identifies five SD principles to guide government departments in developing their policies and strategy. These are:



For a policy to be sustainable, it must respect all five of these principles. Although different policies may place more emphasis on certain principles, all policies should be underpinned by all five.

These principles fit well with Consumer Focus's mission of making a difference to people's lives as consumers, particularly vulnerable consumers, by championing policy changes that can help make people as powerful as the institutions that serve them. This mission must be achieved while living within environmental limits and achieving a just society, and we will do it by means of a promoting a sustainable economy. All this is underpinned by using a sound evidence base to inform our policy making and implementing good governance.

The same UK Strategy also identifies four priorities for immediate focus. These are:

1. Sustainable consumption and production
  - working towards achieving more with less
2. Natural resource protection and environmental enhancement
  - protecting the natural resources on which we depend
3. From local to global: building sustainable communities
  - creating places where people want to live and work, now and in the future
4. Climate change and energy
  - confronting the greatest threat

We draw on these later linking them to projects planned for 2010/11.

Consumer Focus has statutory obligations to safeguard and empower consumers, with a specific responsibility to identify areas of detriment for vulnerable and disadvantaged consumers, while working towards the goals of sustainable development. Sustainability is already a feature of a number of our current projects, but we recognise the need to develop our organisational knowledge and processes to ensure due account is taken of sustainability and is embedded in our workplanning and resultant projects.

Our Annual Plan 2010/11 and the Corporate Plan 2010-13 state that contributing towards the achievement of sustainable development underpins the work we do. We understand we impact on sustainable development both through our use of resources and our policy development, and intend this draft Plan to set out how we manage these impacts.

The following sections set out how we intend to contribute to the aims of the Sustainable Development Strategies of governments across the UK, in terms of the overall corporate policy, consumer policy development, and operations.

# 1. Corporate Policy

Consumer Focus is committed to acting sustainably in all its activities and has identified channels for its contribution to sustainable development. The formal governance of the Sustainability Development programme across workstreams is through a steering group (SDSG) chaired on behalf of the Senior Management Team by Maria Battle, Senior Director of Consumer Focus Wales. The steering group directs the work of, and receives advice and progress reports from the two Working Groups: Sustainable Operations and Sustainable Consumer Principles.

The Steering Group is responsible for monitoring the implementation of the Sustainable Development Action Plan, and reviewing and revising the Plan on an annual basis as part of the work planning cycle. The Steering Group Chair provides updates to the Senior Management Team as part of the quarterly reporting process, and involves them in decision-making as necessary.

**Figure 1: Governance of Consumer Focus's SDAP**



The Sustainable Operations Working Group is chaired by Kim Brown, Services Manager – Consumer Focus Wales. This Group implements communication and operational

initiatives; monitors and reports progress and makes budget recommendations to the Steering Group on operational practices.

The Sustainable Consumer Principles Working Group is chaired by Lucy Yates, Principal Policy Advocate. This Group has the specific responsibility for overseeing and developing our corporate approach to embedding sustainability in our consumer policy work as set out in Development Priority 3 of the Corporate Plan 2010-2013. The group also reports progress and makes budget recommendations to the Steering Group. As policy and advocacy work is the core function of Consumer Focus, it is important that our work on embedding sustainability in our consumer policy is a key part of the SDAP.

In addition to this formal structure, we recognise the importance of employee involvement in the development and delivery of this first plan and in its future. We want to learn from colleagues and other organisations on how to involve people, to capture and action their ideas, and how to generate enthusiasm about the Plan.

1. Together we have agreed the following timetable for developing, consulting and publishing our Plan:

Objective	Priority area	Required action	Outcome	Owner	Target date
1.1	Terms of reference	Finalise terms of reference for steering and working groups	Clarity of accountability	SDSG	Jan 2010
1.2	Draft SDAP 2010-11	Define: <ul style="list-style-type: none"> <li>• overall corporate policy statement</li> <li>• objectives</li> <li>• delivery timetable</li> </ul>	Statement of intent and approach, with corporate commitment	SDSG	Mar 2010
1.3	Internal comms strategy	Engage staff with initial SDAP, its delivery, and its continuous improvement via consultation	Achieve initial objectives, identify areas for future improvement	SDSG	Apr 2010
1.4	Peer review	Gain feedback from similar non-departmental bodies on areas for improvement and potential hurdles	Improve content or measurement of initial objectives, and identify areas for future improvement	SDSG	Apr 2010
1.4.1	Post consultation/ peer review	Use feedback from consultation to shape the SDAP			May 2010
1.5	Business planning	Define sustainable consumer principles for 2011/12 work plan cycle	All business cases address aspects of sustainable development, and the resultant plan seeks to make a meaningful contribution to SD	SDSG	Jun 2010
1.6	SDAP publication	Publish the SDAP	Make the Plan available to stakeholders	SDSG	July 2010
1.7	External comms strategy	Make progress on SD accessible to stakeholders/general public	Impact, clarity, brevity and transparency	SDSG	July 2010 – ongoing

## 2. Consumer policy

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The UK Government's five Sustainable Development principles and four priorities have direct relevance to Consumer Focus's core business of campaigning for a fair deal. We recognise the importance of a sound evidence base and good governance, and understand that a fair deal cannot only be measured in financial terms but must consider the full range of consumer rights.

To make the framework suitable for Consumer Focus, the sustainable development principles need to be incorporated alongside the Consumers International eight consumer rights. All predecessor organisations used a set of consumer principles as a framework for making policy. They are very similar to the Consumers International list of eight consumer rights, which are widely supported by consumer organisations all round the world.

The table below shows how sustainable development is fundamental to the achievement of these eight consumer rights: Has Consumer Focus adopted this rights based approach?

Consumer principles	Sustainable development principles
<b>The right to satisfaction of basic needs</b> – to have access to basic, essential goods and services; adequate food, clothing, shelter, health care, education, public utilities, water and sanitation.	<ul style="list-style-type: none"> <li>• Ensuring a strong, healthy and just society</li> </ul>
<b>The right to safety</b> – to be protected against products, production processes and services, which are hazardous to health or life.	<ul style="list-style-type: none"> <li>• Achieving a sustainable economy</li> <li>• Ensuring a strong, healthy and just society</li> <li>• Using sound science responsibly</li> </ul>
<b>The right to be informed</b> – to be given the facts needed to make an informed choice, and to be protected against dishonest or misleading advertising and labelling.	<ul style="list-style-type: none"> <li>• Achieving a sustainable economy</li> <li>• Ensuring a strong, healthy and just society</li> <li>• Promoting good governance</li> </ul>
<b>The right to choose</b> – to be able to select from a range of products and services, offered at competitive prices with an assurance of satisfactory quality.	<ul style="list-style-type: none"> <li>• Achieving a sustainable economy</li> <li>• Ensuring a strong, healthy and just society</li> </ul>
<b>The right to be heard</b> – to have consumer interests represented in the making and execution of government policy, and in the development of products and services.	<ul style="list-style-type: none"> <li>• Achieving a sustainable economy</li> <li>• Ensuring a strong, healthy and just society</li> <li>• Promoting good governance</li> </ul>

<p><b>The right to redress</b> – to receive a fair settlement of just claims, including compensation for misrepresentation, shoddy goods or unsatisfactory services<sup>1</sup>.</p>	<ul style="list-style-type: none"> <li>• Achieving a sustainable economy</li> <li>• Ensuring a strong, healthy and just society</li> </ul>
<p><b>The right to consumer education</b> – to acquire knowledge and skills needed to make informed, confident choices about goods and services, while being aware of basic consumer rights and responsibilities and how to act on them.</p>	<ul style="list-style-type: none"> <li>• Achieving a sustainable economy</li> <li>• Ensuring a strong, healthy and just society</li> <li>• Using sound science responsibly</li> </ul>
<p><b>The right to a healthy environment</b> – to live and work in an environment that is non-threatening to the well-being of present and future generations.</p>	<ul style="list-style-type: none"> <li>• Living within Environmental Limits</li> <li>• Using sound science responsibly</li> </ul>

In its first year, Consumer Focus has sought to balance the opportunities and tensions between environmental protection, social development and economic development in a range of projects including:

- Fuel poverty: We advocate energy efficiency programmes to improve all consumers' homes by cutting fuel bills and greenhouse gas emissions, starting with fuel-poor households
- Renewable energy tariffs: Working with industry and environmental stakeholders, we have informed the development of the new clean energy cashback scheme to incentivise small-scale renewable energy generation, while managing the impact on other consumers' bills
- Green claims in advertising: Consumer Focus undertook research with consumers to understand what gives consumers confidence in green claims, and inform Defra and ASA guidelines for advertisers

Consumer Focus's workplan for 2010/11 includes projects that aim to:

- reduce the numbers of households suffering in fuel poverty
- make the case for regulatory and voluntary changes to improve the energy efficiency of homes
- ensure consumers' needs are incorporated into planning for inevitable climate change
- influence the development and delivery of the Low Carbon Transition Plan, promoting consumers' financial and non-financial needs in the delivery of smart meters, energy efficiency and other programmes
- improve the quality of the Energy Assistance Package in Scotland
- promote the needs of low income, or other vulnerable, consumers in sustainable development programmes

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<sup>1</sup> Includes the role played by 'informal, peer-to-peer, and global assurance mechanisms that provide consumers with the confidence that their actions are not made irrelevant by the action of others down the road, or on the other side of the world' (Accountability, Consumers International, 2007).

Government priorities	Example projects
Sustainable consumption and production	Information and consumer behaviour change The Low Carbon Consumer Smart meters and smart grids Keeping up the pressure on fuel poverty
Natural resource and environmental enhancement	-
From local to global: building sustainable communities	A strong Post Office network Consumer centred regulation in financial services Essential community services
Climate change and energy	The Low Carbon Consumer (including adaptation to climate change) Smart meters and smart grids

We now want to move to a more systematic approach in order to help staff to understand and address the opportunities and tensions across sectors.

In 2010/11, Consumer Focus will set out how the five sustainable development principles will be incorporated into its consumer policy-making and how the four priorities will be incorporated into work planning in a way that addresses the consumer perspective while also enabling reporting of our activities in a comparable format to other public bodies.

## Consumer policy objectives draft SDAP 2010/11

2. Aim: To define and embed sustainable consumer principles

Objective	Priority area	Required action	Outcome	Owner	Target date
2.1	Define principles	Literature review and peer research  Staff and Board(s) consultation and workshops across Nations	<ul style="list-style-type: none"> <li>• Identify approach to embed sustainability in policy decision-making</li> <li>• Identify how to resolve policy tensions and conflicts within individual projects</li> <li>• Identify practical policy tools</li> <li>• Policy approval function of Boards includes ownership of principles</li> </ul>	SCPWG	Jan – Jun 2010
2.2	Embed in policy work planning cycle	Revise 'Pride in Performance' to reflect chosen approach	Sustainable development aims and evidence inherent in project definition and related business cases, and therefore in work planning (incl. reporting and monitoring)	SCPWG	Jun 2010 – ongoing
2.3	Staff knowledge base	Identify training needs and ongoing support	Use of sound evidence base	SCPWG/HR	Apr 2010 – ongoing

## 3. Operations

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There are several ways Consumer Focus can contribute to sustainable development through its operations:

- reducing energy use
- reducing use of natural resources
- sustainable procurement practices
- management of waste
- staff engagement and involvement

### 3.1 Energy use

Effective energy and resource management offers the chance to create a better working environment, makes us all more productive, and supports a core part of our consumer advocacy. Consumer Focus will demonstrate the benefits through good practice, while also saving money for the taxpayer and investing in our core aim of campaigning for a fair deal.

We are signed up to the 10:10 campaign, committing to aim for a 10 per cent reduction across four key areas of our carbon footprint: grid electricity, on-site fossil fuel use, vehicle fuel use and air travel.

The energy performance of our buildings limits the savings we can make, but we can make savings from recent and planned changes to lighting, printers, and PCs. Further savings can be made by staff, from how we use office equipment to our work-related travel choices. Prior to 1<sup>st</sup> April, our systems did not enable us to report on travel-related emissions, so setting up this system and reviewing our travel policy is part of our commitment to the 10:10 campaign.

Consumer Focus has initial baseline measurements for 2009 (some approximations) but has since developed more stringent performance data collection in the areas of grid electricity, on-site fossil fuel use, vehicle fuel use and air travel for 2010/11 which is a significant first step for this Plan.

The biggest areas of potential energy savings are heating, lighting, air conditioning and office equipment. Government departments have energy efficiency targets of 30 per cent saving per metre squared by 2020, relative to 1999/00 levels. Consumer Focus will aim to beat these targets by the opportunity offered when leases come up for renewal in 2011. We aim to improve our energy management by relocating the London and Cardiff offices to properties with better Energy Performance Certificates (EPCs) and BRE Environment Assessment Method (BREEAM) ratings. Government has made a commitment to procure only buildings in the top quartile of energy performance and to report on progress against this commitment each year in the State of the Estate Report. The top quartile level is redefined each year, by analysing the database of EPC ratings, in order to ensure that it remains accurate and up to date. For **2010**, the level set by Government is **68 (a low C rating)**. This means that Consumer Focus **must choose its new offices from among those buildings with an EPC rating of 68 or more** in order to be compliant with the top quartile commitment throughout 2010.

We will encourage staff to take responsibility for using energy efficiently, but we know that this is likely to need supportive policies, IT programs, processes and performance recognition. Existing initiatives such as our 'Greening ICT' strategy, need to be supported, and reviewed so that they have a continuing existence, addressing new issues and making the most of new technologies such as automatic switch off at 8pm for all

computers and screens. New initiatives need to be encouraged so that the specific ways in which particular workgroups can contribute to sustainable development may be exploited to the benefit of employees and Consumer Focus.

**Our programme for implementing the operational parts of the Plan is:**

Objective	Priority area	Required action	Outcome	Owner	Target date
3.1.1	Baseline assessment	Identify and quantify necessary baselines for energy use	The ability to set targets that are progressive and measure improvement	SOWG/Angela Fox	Mar 2010
3.1.2	Energy efficiency	Install energy measurement devices	Ability to demonstrate the areas in which energy use is higher and target these for savings	Facilities Manager	Mar 2011
3.1.3	Greening ICT	Review the Greening ICT strategy	Updated strategy to reduce energy use by ICT  Review of progress	Head of IT	Mar 2010  Jan 2011
3.1.4	Display Energy Certificates	DECs to be completed for each building and displayed appropriately	Employees and visitors are able to see the rating and that Consumer Focus is managing its energy performance seriously	Services Managers	May/Jun 2010
3.1.5	Property acquisition	In planning for lease expiry, incorporate SD in decision on choice of property	Ensures CF locates itself in more energy efficient, sustainable thinking spaces/buildings	Angela Fox	Jun 2010

3.1.6	Office design	Incorporate SD considerations into office layout planning	Reduced carbon footprint, reduced costs	Services Managers	Mar 2011
3.1.7	Lighting	Install sensor switches	Reduced carbon footprint, reduced costs	Facilities Manager	Mar 2011
3.1.8	Individual action	Identify and communicate areas of staff responsibility for energy efficiency	Reduced carbon footprint, reduced costs	Services Managers	Jun 2010
3.1.9	Transport emissions	Develop approach to reduce travel-related emissions	Travel-related emissions are measured, managed and reduced	SOWG	Sept 2010

### 3.2 Natural resource use

As well as energy savings, we will reduce our use of natural resources: for example by using both sides of a piece of paper; using a glass or mug rather than a plastic or paper cup; repairing rather than replacing faulty equipment; replacing equipment only when it has passed its service life.

Working practices may be modified: by printing less and using double-sided printing; by using emails, the phone and video-conferencing rather than travelling; by using recycling bins in offices for all recyclables and using the waste bin only as a last resort. Staff will be responsible for reducing waste from their activities and developing efficient, sustainable behaviours in the workplace, but we will seek to identify and implement supportive policies, processes and performance recognition.

Objective	Priority area	Required action	Outcome	Owner	Target date
3.2.1	Baseline measure	Identify and quantify necessary baselines for natural resource use	The ability to set targets that are progressive and measure improvement	SOWG/ Reduced carbon footprint, reduced costs.	Mar 2010

3.2.2	Water	To review use of water and identify any practical ways of reducing usage	Water efficiency measures promoted to landlords or incorporated in future property decisions	Angela Fox	Jan 2011
3.2.3	Waste	Develop and implement a waste minimisation programme in line with ePIMS (data collection requirement for BIS)	Waste minimisation programme, linked to Greening ICT strategy	Services Managers	Jan 2011
3.2.4	ICT disposal	Review ICT disposal systems as part of Greening ICT strategy (3.1.3)	Reduced waste and energy consumption	SOWG/IT	Jan 2011
3.2.5	Consumable office supplies	Analyse volume of consumables, measure recycled waste, measure waste	Targets set for reduced waste	Services Managers	Jan 2011
3.2.6	Individual action	Identify and communicate areas of staff responsibility for waste reduction	Reduced carbon, waste and costs	Services Managers	Feb 2011
3.2.7	Recycling: paper/card, waste, glass/tins/plastic	To review process of recycling within each office and identify improvements	Increase recycling as proportion of total waste, minimise waste	Services Managers	Mar 2011

### 3.3 Procurement

Sustainable performance will be encouraged in others through the incorporation of sustainability criteria in our procurement policy. Goods and services bought in will be selected, alongside measures of price and performance, for the degree to which they are sourced from sustainable materials; for whether the plant which made them is sustainable or wasteful; for the resource efficiency of new equipment rather than simply its cost efficiency.

Objective	Priority area	Required action	Outcome	Owner	Target date
3.3.1	Procurement SD Strategy	Define SD parameters for each group of goods and services bought in, and general guidelines for one-off purchases.	Sustainability embedded in procurement process	Angela Fox/Paul Howe	Aug 2010
3.3.2	Procurement decisions on travel	Provide clear guidelines/guidance to staff on procurement of travel	Reduce carbon emissions output for 10:10 and reduction in costs (see 3.1.9)	Paul Howe and Services Managers	Aug 2010

### 3.4 People

We will take account of sustainability principles when developing all our HR policies.

Objective	Priority area	Required action	Outcome	Owner	Target date
3.4.1	Provide staff with ongoing feedback on the successes of embedding SD.	Encourage regular news feeds on progress against targets outlined in the SDAP.  Encourage staff to continue to present ideas to the SOWG or SDSG on areas for improvement and/or potential hurdles	Improve staff involvement with the scheme and identify areas for future improvement	SOWG / Internal Comms	July 2010 - ongoing

### **Sustainability at Consumer Focus: what can you do to play your part?**

All employees will be encouraged to take part and provide ideas of other ways where colleagues at Consumer Focus can make sustainable decisions within the workplace. We are committed to listening and explaining what and why we have agreed these targets.

The Steering Group wants to encourage a social sustainable work ethic at Consumer Focus where we work together to care for the environment as well as the environment in which we work.

Should you have further comments or suggestions throughout 2010/11- please email [sdap.consultation@consumerfocus.org.uk](mailto:sdap.consultation@consumerfocus.org.uk)



**Consumer  
Focus**  
Campaigning for a fair deal

## **Sustainable Development Action Plan 2010/11**

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