College infrastructure strategy and sustainability

EAUC Scotland briefing paper for the Scottish Funding Council



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Executive summary

The policy context
Alongside other public bodies, the Scottish Funding Council (SFC) and Scotland's colleges are expected through a range of statutory requirements and non-statutory guidance to support Scotland's national sustainability objectives.

For colleges, strategic priority areas of focus should include emissions reduction; climate risk and adaptation; biodiversity; and learning for sustainability. Whilst the sector has made progress across these four areas, action and impact is limited both within institutions and across the sector.

For SFC, a strategic priority should include, through their influence, supporting colleges to maximise positive outcomes in the above areas of focus. This includes through the College Infrastructure Strategy's (CIS) development and implementation.

The problem
There is an ongoing and critical risk that college sector infrastructure development, investment and management do not adequately align to both sustainability and educational delivery needs, nor recognise that these are interrelated. The outcomes of this risk are:

- Higher operating costs
- Significantly increased asset retrofit costs
- Service disruption due to climatic events
- Decreased health and well-being for campus communities
- Decreased educational attainment and learner experience.

These risks are already being observed or are likely to be occurring within the sector.

The solution
With that in mind, EAUC Scotland recommend that a core driver of the CIS should be:

"To facilitate college infrastructure development, investment and management that enables a transition to low-carbon planning, design, delivery and operations, ensures resilience to current and future climate risks, and integrates nature and biodiversity to deliver high-quality, healthy and inclusive environments that support educational excellence and wellbeing for learners, staff and communities."

SFC should create and facilitate infrastructure and wider relevant processes and agreements that fundamentally steer colleges towards or restrict them to:

- Sustainable infrastructure design and construction (e.g. low embodied emissions; participatory decision making; spaces for experiential learning; climate risk ready)
- Sustainable operations across all three emission scopes (e.g. zero direct heating emissions; low utility use; infrastructure supports sustainable commuting behaviours)
- Flexible learning spaces, including quality outdoor learning environments

- Improved nature and biodiversity outcomes on site and through supply chains.

Potential high-level actions from SFC could include:

Action	Rationale
SFC requires all colleges to have comprehensive climate risk registers and adaptation action plans in place and be able to submit these as part of infrastructure funding applications.	If colleges cannot demonstrate comprehensive understanding of their climate risk and adaptation plans, then they won't be able to demonstrate and communicate it with designers/construction contractors. Current wider construction sector practices are outdated regarding modelling and understanding climate risk. There would be a critical risk that any investment in infrastructure is not adequately designed, delivered or managed that is climate resilient. This would likely result in expensive future retrofit costs and disruption to service delivery. EAUC Scotland have produced a freely available climate risk register guide and tool for colleges to use, alongside a climate risk communications pack and campus climate risk profiles.
SFC requires, where relevant, college infrastructure investments follow best practice building standards such as the Net Zero Public Sector Buildings Standard for New Builds and Refurbishment and Passivhaus.	If sustainability isn't a fundamental lens of college infrastructure design, investment and management, then it is likely to not be included holistically in design and is also likely later on to be cost-engineered out. This increases the risk of infrastructure being invested in that does not meet educational nor climate resilience needs, requiring additional investment in future.
SFC requires, where relevant, college infrastructure investments consider both embodied and	Scope 3 supply chain emissions and student and staff commuting emissions are the largest emission sources for colleges in Scotland – infrastructure investment and

operational emissions across all three emission scopes.	management needs to support a reduction in these emissions, where relevant.
SFC recognizes and embeds quality outdoor and experiential learning spaces as a key aspect of the College Infrastructure Strategy	There is a growing body of evidence to suggest that teaching in outside spaces can promote learning by improving learners' attention, levels of stress, self-discipline, interest and enjoyment in learning, physical activity and fitness, and community and cohort-building. However, despite its benefits and that outdoor learning is part of the formal curriculum for 3-to-18-year-olds under Scottish Government's Learning for Sustainability action plan, there are extremely few purposefully designed outdoor education spaces on Scottish college campuses. To date this has been a missed opportunity as: • It restricts learner experiences • Quality outdoor learning spaces are likely to cost less to implement and maintain than formal classroom settings • Quality outdoor learning spaces can present a climate adaptation measure (e.g. the ability to teach in a shaded outdoor space compared to an overheating classroom). More broadly, infrastructure that enables outdoor and experiential learning supports a whole-institution approach to Learning for Sustainability by connecting campus, curriculum and behaviours, and enabling the development of sustainability skills aligned with Scotland's net zero and skills agendas.
SFC facilitates sustainable infrastructure training for sector staff from estates, procurement, finance and education delivery.	Multiple internal stakeholders are involved in infrastructure design, implementation and management processes. However, there is a consistent and extensive lack of internal expertise regarding sustainability across the stakeholder groups. Feedback from the sector has been that institutions are reliant on consultants who are happy to push for BREEAM and easy "tick box wins" but if asked about more ambitious standards they cannot correctly advise.

	By improving internal college and sector expertise in this area, it is more likely that the right investments are implemented so that colleges are not locked into expensive and difficult to correct situations in the future. This is also critical to ensure that infrastructure decisions actively support Learning for Sustainability, including enabling behaviour change, experiential learning, and alignment between campus operations and the curriculum.

These principles and actions would support SFC and colleges in:

- Evidencing action in line with the PBCCD and the relevant statutory guidance
- Reducing operational costs
- Reducing future retrofit costs for climate adaptation and/or in response to future climate events
- Improving learner, staff and community outcomes.

Scottish Government policy and strategy

The Climate Change (Scotland) Act 2009, the Scottish Funding Council and Scotland's colleges

The Climate Change (Scotland) Act 2009 requires relevant public bodies in Scotland, including the Scottish Funding Council (SFC) and Scotland's colleges, to meet the climate change duties. The duties are set out in section 44(1) of the 2009 Act and require that a public body must, in exercising its functions, act:

a. in the way best calculated to contribute to the delivery of emissions reduction targets

b. in the way best calculated to help deliver the Scottish National Adaptation Plan

c. in a way that it considers most sustainable.

These are known as the Public Body Climate Change Duties (PBCCD).

In fulfilling the climate change duties, 'exercising functions' should be taken to encompass the public body's corporate operational functions, policy-making functions or influence, and the overall delivery function (i.e. the purpose of the body).

The Climate Change (Scotland) Act 2009 and the statutory guidance for public bodies

The statutory guidance for public bodies on the climate change duties is issued by the Scottish Ministers to Scottish public bodies under the 2009 Act.

The purpose of the guidance is to support public bodies in performing their climate change duties. It does this by providing context, setting out key values and expectations for public bodies when performing their duties, and detailing guidance and signposting to case studies and resources on operationalising sustainability.

Actions set out in the guidance should be undertaken in a way that is proportionate to each public body's size, assets, functions and influence.

All named public bodies are required to have "regard" to the guidance. However, the guidance is an advisory document only and, without a legal challenge to date being brought against a public body to test their fulfillment of the PBCCD, there is no legal precedent to help determine to what extent public bodies must align with the guidance. Responsibility for compliance with the climate change duties rests with public bodies themselves.

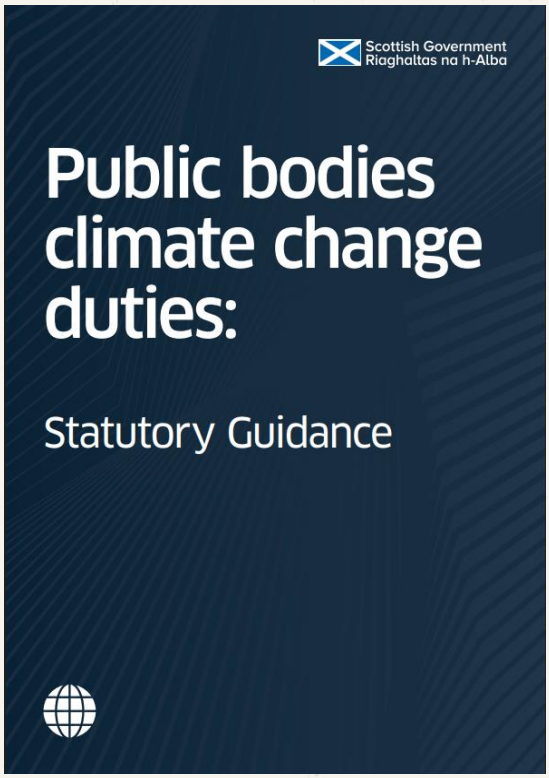


Figure 1: The purpose of the above statutory guidance (published 2026) is to support public bodies in performing their climate change duties.

Reporting and external auditing against the Act and statutory guidance

SFC and colleges are required to report to Scottish Government each year their progress against the PBCCD. This process is currently facilitated by the Sustainable Scotland Network (SSN). Reporting guidance and historical reports are available on their website.

Historically, there has been no or limited external auditing of institutional responses to the PBCCD and statutory guidance. This has changed through the creation of Environmental Standards Scotland (ESS), an independent public body set up to ensure environmental laws and standards are adhered to in Scotland, replacing the European Union's scrutiny and enforcement role after Brexit. ESS have significant statutory powers (Table 1) and can require the SFC and colleges to take remedial action if found not to be complying with environmental law, including the Climate Change (Scotland) Act.

In addition, Audit Scotland have increasingly embedded environmental aspects into their auditing of public bodies. A lessons learnt report was published in March 2026.

Table 1: summary of Environment Standards Scotland's statutory powers and their description (ESS 2026).

Statutory Power	Description
Information notice	Requires a public authority to provide us with any information we need to be able to carry out our functions.
Improvement report	Report to the Scottish Parliament setting out what a public authority must do to comply with environmental law or to improve effectiveness. The Scottish Government must respond to the report by submitting an Improvement Plan to the Scottish Parliament for approval.

Compliance notice	Requires a public authority to take steps within a specified timescale to address a failure to comply with environmental law and to prevent that failure being repeated.
Judicial review	Enables ESS to apply for judicial review or to intervene in other civil court proceedings where there is a serious failure to comply with environmental law and where there is a risk of serious environmental harm.

What does the Act and statutory guidance mean for the SFC, colleges and the College Infrastructure Strategy?

In summary:

- SFC and all of Scotland's colleges are required to fulfil the PBCCD listed within the 2009 Act
- In doing so, SFC and colleges must reflect on the content of the statutory guidance and be satisfied that they are able to demonstrate their reasoning for why they have approached delivery of the PBCCD in their specific way
- The CIS and its implementation should be informed by the PBCCD and statutory guidance
- SFC and colleges must report to Scottish Government annually their progress against the duties through PBCCD reporting
- There is a growing role of external auditing in this space from Environmental Audit Scotland and Audit Scotland. Critically, ESS have significant statutory powers to secure public body compliance with environmental law and how it is implemented or applied (Table 1). The SFC and colleges should recognise not meeting the PBCCD as a strategic risk.

With this in mind, a core driver of the CIS should be:

"To facilitate college infrastructure development, investment and management that enables a transition to low-carbon planning, design, delivery and operations, ensures resilience to current and future climate risks, and integrates nature and biodiversity to deliver high-quality, healthy and inclusive environments that support educational excellence and wellbeing for learners, staff and communities."

Spotlight on Learning for Sustainability and how it relates to college infrastructure

Learning for Sustainability

Learning for Sustainability (LfS), or the international equivalent Education for Sustainable Development (ESD), "gives learners of all ages the knowledge, skills, values and agency to address interconnected global challenges including climate change, loss of biodiversity, unsustainable use of resources, and inequality. It enhances the cognitive, socio-emotional and behavioural dimensions of learning and encompasses learning content and outcomes, pedagogy and the learning environment itself." (UNESCO)

In Scotland, LfS is an entitlement for all learners, and strong recent policy developments such as the LfS Action Plan have anchored this more deeply in 3-18 education. LfS is also increasingly driven in further education through the following developments:

- GTCS Professional Standards for College Lecturers - two standards include sustainability in learning and teaching
- SFC Outcomes Framework and Assurance Model: Net Zero and EDI as cross-cutting themes
- NextGen HN by Qualifications Scotland, revised qualifications: LfS key aspect and mandatory part of qualifications
- Tertiary Quality Enhancement Framework: sustainability is in the renewed QAA Quality Code, which college quality assurance processes now build on.

The role of college infrastructure in Learning for Sustainability

College infrastructure plays a critical enabling role in LfS as the learning environment extends beyond the classroom: encompassing buildings, spaces, grounds and how they are managed. This also builds on Scottish Government policy which is clear that all 3-to-18-year-old education settings' buildings, grounds and policies should support LfS.

When designed and managed well, infrastructure can enable LfS by:

- Embedding sustainability into everyday learning, making low carbon systems, biodiversity features and resource use visible and usable as teaching tools
- Creating flexible and experiential learning environments including outdoor spaces and adaptable buildings that support project-based, interdisciplinary and place-based learning
- Shaping behaviours and norms which influence how learners and staff engage with energy use, travel, waste and nature through intuitive building design and campus layout
- Supporting whole-institution approaches where teaching, operations and student experience reinforce each other - connecting campus and curriculum.

Conversely, poorly designed or managed infrastructure can act as a barrier to LfS by:

- Restricting teaching approaches through inflexible, outdated or mono-functional spaces that limit active or experiential learning
- Undermining sustainability messaging –where inefficient buildings, poor thermal comfort or visible design flaws contradict sustainability ambitions or curriculum content
- Locking in unsustainable behaviours and costs through high energy demand, car-dependent campuses or lack of integration with nature
- Reducing resilience and learner outcomes where issues such as overheating or flooding disrupt teaching and learning, impair concentration and cognitive performance, and negatively affect health and wellbeing.

Infrastructure decisions are not neutral. They can enable or constrain delivery of LfS. Ensuring that capital investment actively supports flexible learning, visibility of sustainability, and alignment between campus and curriculum is therefore essential to delivering both educational and sustainability outcomes.

Where is the college sector now?

Greenhouse gas emissions reporting

The college sector generally has better quality emissions footprint reporting than other public sectors in Scotland and has improved each year over the past 10 mandatory reporting years. However, there are gaps in reporting from different institutions as shown in table 2 below (EAUC Scotland PBCCD 2024/25 College Analysis Report). Bolded emission sources in table 2 identify which sources colleges should, as a minimum and where relevant, report emissions from in line with the PBCCD statutory guidance and freely available resources (e.g. from EAUC and APUC).

Table 2: Summary of the number of colleges reporting specific emission sources for 2024/25 and a comparison against the previous years' reports. Bolded sources reference emission sources colleges should be reporting as a minimum, where relevant.

	Emissions source	Number of institutions reporting	Percentage of sector	Change from 2023/24
Scope 1	**Energy (natural gas; gas oil; biomass; other fuels)**	24	100	=
	F-gases	15	63	+2
	Fleet vehicles	18	75	-1
	Land use and livestock	0	0	=
Scope 2	**Electricity**	24	100	=
Scope 3	**Electricity and purchased heat and steam transmission and distribution**	22	92	+1
	Waste	21	88	=
	Water	24	100	+1
	Business Travel	22	92	+3
	Hotel stays	9	38	+3
	Staff homeworking	19	79	=
	Supply chains	15	63	+3
	Commuting	8	33	-1
	Student relocation emissions	1	4	=
	Fuel- and energy related activities (WTT)	0	0	=
	Investments	0	0	=
	Leased assets	0	0	=
	Student homeworking	0	0	=

Key

Green = improved sector reporting and/or 100% reporting rate

Orange = no reporting change compared to previous year and <100% reporting rate

Red = decreased sector reporting

Greenhouse gas emissions reduction

Total reported operational[1] emissions reduced by 9% compared to 2023/24 and a 43% reduction compared to 2015/16. This has been largely driven by significant reductions in emissions from electricity (-65% since 2015/16) and natural gas (-20% since 2015/16).

Electricity use and emissions

Emissions from electricity use reduced 15% compared to the previous year and reduced 65% compared to 2015/16. It is important to note that the conversion factor for emissions per kWh of electricity used also decreased 14.5% compared to the previous year. Therefore, whilst emissions from electricity use have decreased significantly, electricity use itself has remained stable at a college sector level. In future, it is expected that sector electricity use will increase as more colleges electrify heating systems, whilst emissions should continue to fall in the short-to-medium term as more renewable energy connects to the national grid system.

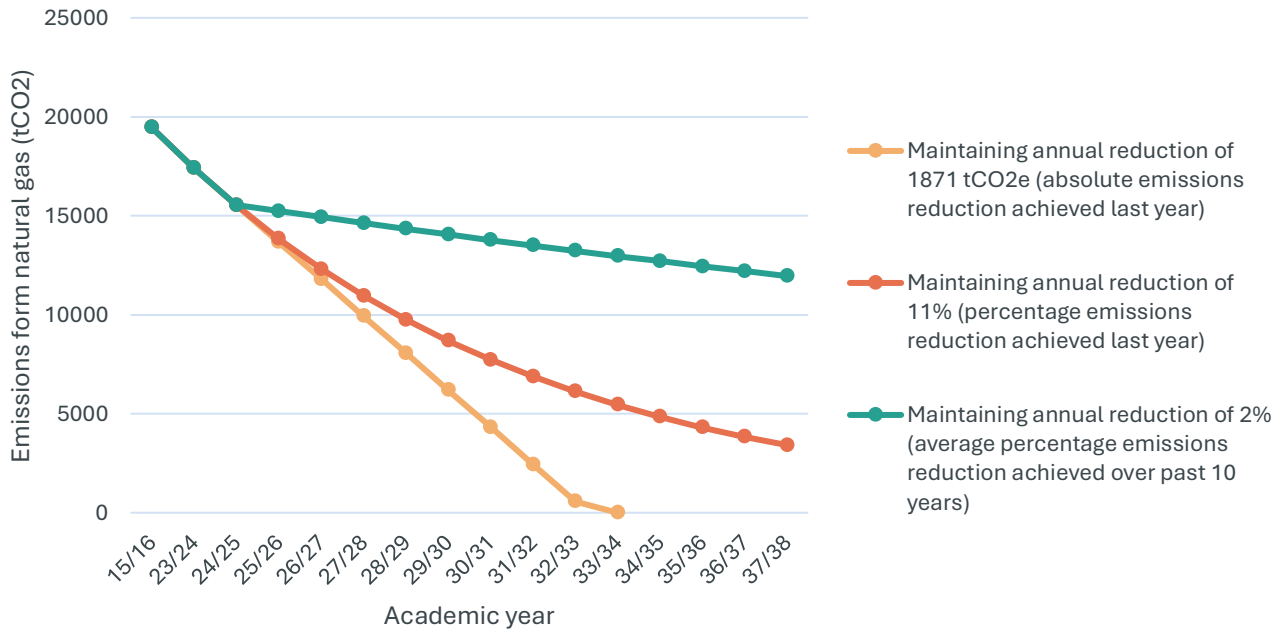
Natural gas use and emissions

Emissions from natural gas reduced 11% compared to the previous year and reduced 20% compared to 2015/16. Over half of the reported emissions reductions in the past year came from just 5 colleges. This has largely been the result of successful large-scale heat decarbonisation and fabric upgrade grant funding, improved building energy management and space consolidation actions which have reduced need for natural gas heating. Since 2021, 9 colleges have received a total £23.7m for energy efficiency and heat decarbonisation projects through the Scottish Green Public Sector Estate Decarbonisation Scheme.

Graph 1 illustrates three natural gas decarbonisation pathways using recent and historic reduction trends. Recognising that Scottish Government has expected all public sector heating systems to be fossil-fuel free by 2038 (note EAUC are awaiting confirmation from Scottish Government this target is still in place), maintaining an annual reduction of 1871 tCO2e - the absolute emissions reduction achieved last year – is the only scenario presented that meets this target. This scenario also demonstrates the significant impact transformative heat decarbonisation funding from Scottish Government has had on changing sector natural gas use and can continue to have if provided with the same consistency.

[1] EAUC Scotland define “operational emissions” as all scope 1 and 2 emissions, as well as scope 3 emissions from electricity and hear transmission and distribution, water supply and treatment, waste, business travel, hotel stays and homeworking.

Graph 1: Projected college sector emissions from natural gas use based on recent and historic reduction trends



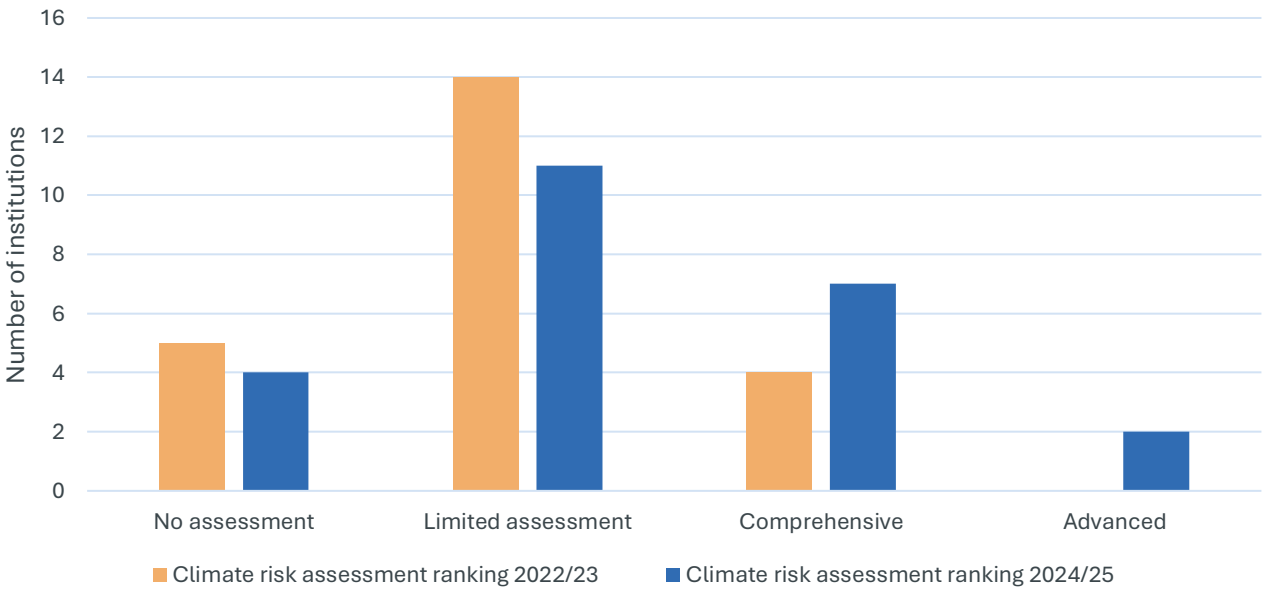
Key reflections for the College Infrastructure Strategy

- Colleges need to ensure that infrastructure heating systems are non-fossil fuel powered. Maintaining the historical pace of change does not meet Scotland's targets.
- The transition from fossil fuel heating systems to non-fossil fuel systems will require substantial, consistent, multi-year funding.
- To date, Scottish Government funding to colleges has not covered the costs for upgrading connections to the national grid.
- Generating renewable energy on-campus or through direct wire systems can reduce operational energy costs and present a return on investment. Substantial renewable energy schemes may reduce the need for upgrading connections to the national grid associated with electrification of heat.
- Anecdotally, college sector's understanding of infrastructure needs and space utilisation appear low. Improving building and energy management systems present an important for lowering heating and electricity demand.
- College infrastructure design faults present resistance to climate mitigation, adaptation and educational aims. For example, sector feedback shows that south-facing facades with standard glass fronts can cause overheating in classrooms on sunny days. This impacts staff and student wellbeing and attainment. To counter this, colleges could invest in air conditioning. Whilst this addresses the issue of overheating, it increases emissions from electricity and refrigeration gases and raises operational costs. College infrastructure needs to be considered through the lenses of climate mitigation, climate adaptation and user wellbeing and learning.

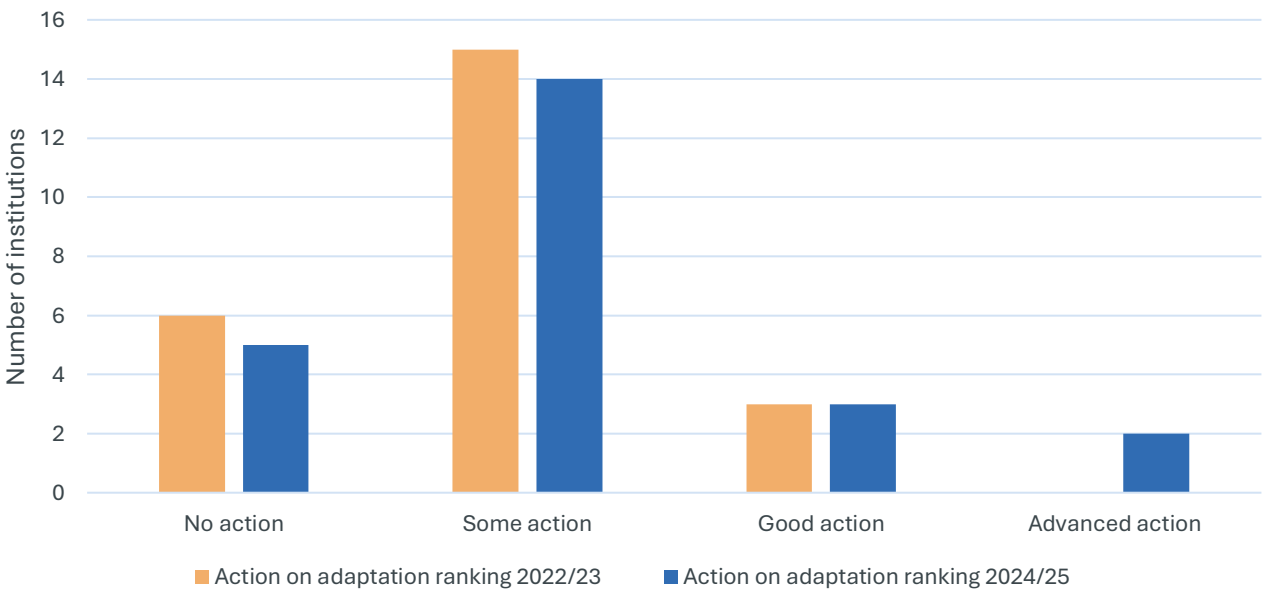
Reporting of climate risk and adaptation action

Graphs 2 and 3 show the Sustainable Scotland Network's assessment of the sector's evidence of understanding of institutional climate risk and the level of adaptation action taken based on 2022/23 and 2024/25 PBCCD submissions.

Graph 2: Comparison of college understanding of their own climate risk evidenced in PBCCD reports 2022/23 and 2024/25



Graph 3: Comparison of college adaptation action as evidenced in PBCCD reports 2022/23 and 2024/25



Between the 2022/23 and 2024/25 reporting periods, the college sector has evidenced a marked improvement in its understanding of climate risk. 63% of sector evidenced “No assessment” or “Limited assessment” for 2024/25 compared to 83% for 2022/23. However, 2 colleges that scored “Limited assessment” in 2023/24 scored “No assessment” in 2024/25. This suggests that consistency in reporting quality could be a challenge for some colleges and that the number of colleges with no climate risk assessment in place is lower than shown in Graph 2.

Whilst understanding of climate risk is deepening across the college sector, Graph 3 shows that there has been limited improvement in colleges evidencing stronger action on adaptation. However, 5 colleges scored “Good action” or “Advanced action”, presenting a good opportunity for knowledge-sharing within the college sector.

Key reflections for the College Infrastructure Strategy

- The Climate Change Committee has published its fourth independent assessment of UK climate risk (May 2026). The report highlights three priority risks for the UK by 2050 at around 2°C of global warming:
  - Intensifying heat: recent record hot summers (such as 2018, 2022 or 2025) will become the new normal summer. Heatwaves lasting at least a week will be common.
  - Growing flood risk: intensity of heavy bursts of rainfall throughout the year could be around 15–60% higher than in the late 20th century - driving more risk of flash flooding and potential risks to life. Sea levels will be 20–45 cm higher around UK coasts than today, raising the severity and frequency of coastal flooding and coastal erosion.
  - Rising drought and wildfire risk: despite bursts of increasingly heavy rain, summers will, on average, become drier. The number of days that have the potential conditions for serious wildfires could double, and the wildfire season will be longer, leading to increased exposure to the health harms from fire smoke and damages to infrastructure and buildings.
- Whilst improving, most colleges only have a basic understanding of their current and future climate risks.
- Most colleges are unable to demonstrate good action on adaptation.
- Anecdotally, colleges already experience climate risk challenges, particularly relating to overheating and flooding. This not only impacts infrastructure but also increases financial costs and reduces the opportunity for investment elsewhere, reduces staff and student health and wellbeing and reduces the student learning experience and potentially educational outcomes.
- Referenced in the statutory guidance, the Climate Change Committee advises, as a minimum, policymakers and public bodies to plan for 2°C of global warming by 2050, and to assess the risks for 4°C by 2100.
- There is a significant risk that current and future capital investment in college infrastructure is undermined by future climate events due to improper design and implementation.
- The Climate Change Committee (2022) identify that early adaptation investments deliver high value for money, with benefit-cost ratios typically range from 2:1 to 10:1. Conversely, delayed action increases societal costs significantly.

Learning for Sustainability in colleges

Evidence from across the Scottish college sector shows that Learning for Sustainability (LfS) is not yet embedded consistently across institutions, despite clear policy drivers.
There are strong pockets of practice across colleges and subject areas, often driven by committed individuals. However, these are typically fragmented rather than systemic, with limited alignment between curriculum, campus and operations.

Several common challenges limit progress:

- Limited staff capacity and competing priorities, meaning sustainability is often deprioritised unless it is required or incentivized
- Gaps in knowledge and confidence, with sustainability often understood narrowly (e.g. as environmental only), limiting its integration across subjects
- Weak integration into assessment and qualifications, and limited alignment with the learning environment, reducing its visibility and impact on learner outcomes
- Disconnection between campus and curriculum, meaning infrastructure and operations are not consistently used to support learning.

At the same time, there is significant untapped potential. Colleges are already major contributors to social sustainability (e.g. addressing inequality and supporting communities) and are critical to delivering green and wider sustainability skills, aligned with Scotland's net zero and skills agendas.

Infrastructure also plays an important role in shaping behaviours and building use. How buildings are designed, operated and experienced influences how learners and staff engage with energy, waste, travel and resource use. Without this alignment, there is a risk that infrastructure undermines, rather than reinforces, learning and behaviour change objectives.

These challenges highlight the need for joined-up governance, strategy and action. Without a coherent whole-institution approach, there is a risk of fragmented activity, reduced impact, and perceptions of "greenwashing" where sustainability is not meaningfully embedded.

Key reflections for the College Infrastructure Strategy:
To realise this potential, infrastructure investment must actively support a whole-institution approach to LfS - where campus, curriculum, operations and behaviours are aligned, including enabling flexible and experiential approaches to learning. This is essential not only to deliver educational and sustainability outcomes, but also to improve learner outcomes and experience, maximise the value of public investment and support Scotland's wider policy and skills objectives.

Summary and recommendations

SFC and Scotland's colleges are required to fulfil the PBCCD listed within the 2009 Act and, in doing so, must have due regard for the content of the statutory guidance. SFC and colleges should be satisfied that they are able to demonstrate their reasoning for why they have approached delivery of the PBCCD in their specific way. This includes the development and implementation of the College Infrastructure Strategy.

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