

SLCC Reporting on the Scottish Biodiversity Duty 2018 to 2020



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A. Biodiversity and the SLCC

The Scottish Legal Complaints Commission (SLCC) is a Non-Departmental Public Body employing 57 staff at our office in central Edinburgh. As an office-based organisation, our primary contribution to the conservation of biodiversity continues to be focused around resource efficiency, the use of sustainable suppliers and encouraging staff engagement with green issues.

The SLCC has an obligation under the Nature Conservation (Scotland) Act (2004) and the Wildlife and Natural Environment (Scotland) Act (2011) to consider biodiversity while carrying out day to day responsibilities, and to produce a publicly accessible report every three years detailing the steps taken to meet the duty. This report covers the period from January 2018 to December 2020, and follows on from our second Biodiversity report, published in January 2018.

In 2015 and 2017, we reported that our Board and Senior Management Team were committed to improving resource efficiency within the organisation, and in this paper, we hope to illustrate how that commitment has been maintained, and how we have built on our previous actions to achieve continuous improvement.

B. Actions Taken and Change Monitoring

The SLCC has continued our accountability via our Sustainability policy, the formalised policy was updated in 2018, and it sets out our primary aims around reducing paper consumption, minimising corporate travel, sustainable procurement, reducing wasted energy and recycling. The policy is reviewed every two years, is easy to read and readily accessible to all staff. Highlighted in the policy is our sustainability promise to continue to look for improvements in our way of working, to provide bi-annual updates to staff and the Board on our sustainability performance, and to support internal engagement events

An important biodiversity aim from the last reporting period (2015-2017) was to work closely with our Landlord's agents and other Tenants in the building to drive forward plans for more energy efficient lighting and heating systems as well as the introduction of shared facilities for food waste recycling. In November 2018, our office lighting was upgraded to a more energy efficient LED system. Additionally, the system was fitted with 'occupancy' sensors that allow for the lights to turn off in areas that are vacated and saves on unused, wasted electricity.

The SLCC has also contributed into the campaigning of our Landlord to arrange food waste collection for the whole building. Since February 2019, a central food waste collection service has been in place. In the first year, 2.75 tonnes (2750kgs) of food waste has been collected which would have otherwise been put into landfill. Changeworks Recycling Limited provides the collection service and is the same provider that the SLCC uses for its own recycling collection. In actively choosing the same provider, the SLCC



hopes to save on carbon emissions. Changeworks is a front-runner in the recycling industry as one of the first recycling company to recycle all their collected materials solely in the UK.

We continue to provide opportunities to boost staff wellbeing while also benefitting the environment. We joined the Cycle to Work scheme in 2015, and 3 people have made use of the service to buy a bike. This has provided them with a clean mode of transport and a chance to get out in green spaces, and we continue to support the scheme. In September 2020 we signed up to the NHS Fleet scheme which gives staff the opportunity to purchase fully electric cars more affordably through salary sacrifice. We are encouraged that there has been one member of staff signing up to the scheme. The SLCC serves to promote sustainable commutes and we are fortunate that the situation of the office is a one minute's walk from Waverly station and several bus stops which allows staff to favour public transport over motorised vehicles and also provide staff with travel loans to allow them to buy annual season tickets. The SLCC is committed to monitoring the transport usage of staff and as part of 2019 and 2020 climate week Staff reported that the majority of SLCC use public transport (bus, train, tram) and walking and cycling over driving to work.

We continue to have an ongoing destruction project which is concerned with the destruction of paper records that have reached the end of their agreed retention period. This work has provided us with an opportunity to take a substantial step forward in terms of our re-use of filing equipment (folders, file dividers, hanging slings, plastic wallets and even paper clips). As paper files reach their destruction date, all materials that can be reused are retained and used again, while documents are sent for confidential recycling. Our stationery order has gradually reduced as the project has progressed, and there is now a clear preference for re-use where possible

A new organisational strategy

In late 2019 and early 2020 we also developed a new organisational strategy for the organisation.



This included an assessment of environment considerations, from the impact of increasing extreme weather events to what part we could play in tackling environmental issues. A summary of the considerations our strategy was based on was published for discussion. We consulted on this and based on our own thinking

and feedback from stakeholders we set ourselves the ambitious goal of being fully paperless by 2024. The legal sector is still heavily reliant on paper, and so this ambition includes working with businesses to implement a rule changes requiring that files are submitted to us electronically to allow the full digitisation of our process. The response to COVID-19 started to overtake this, but means planning is in place to ensure we do not return to old ways of working afterwards.

Late in 2020 the organisation has started planning the next phase of its evolution. Decisions are not yet finalised, but there are now options under consideration which may see a reduced office floor plate, and use maintain much lower levels of commuting, consumption and waste maintained.

The Impact of Coronavirus on Sustainability at Scottish Legal Complaints Commission

From March 2020, following Government guidelines surrounding the Coronavirus pandemic all staff began working from home. Remote working has had major consequences on our office environmental impact. We would categorise these as short term – consequences that resulted from the closure of the office and long term – consequences that we do not expect to go back to how they were when returning to the office.

Lower energy consumption was a considerate short-term consequence from all staff working from home. As the office was not in use, the office lights and all PCs were switched off and the Landlord's Agent turned off the building's heating between April and October 2020. The bathroom facilities were not in use, which reduced water usage. There was also less waste material created This is evident in the comparison of recycling collection between the dates 1st April and 29th October in 2019 and 2020 as shown in the chart below.

Another short-term consequence was the saving on carbon emissions from staff no longer commuting or requiring to travel for work and all meetings have moved to online video or phone calls including board and mediation sessions. In September 2020 85% of Staff and board members reported that 'reduced travel' was the highest adopted green behaviour encouraged by Lockdown.

Other trends reported as a direct result of working from home have been less food waste as all meals are eaten at home food is less likely to be wasted. Similarly, reduced plastic use as staff were not in the office, the regularly bought lunches in convenient plastic take away packaging and small plastic bottles, for instance, were replaced with homemade meals served on crockery. Buying locally, as the supermarket stocks were depleted, local shops were used much more regularly. The SLCC has also encouraged Greener behaviours like reusable face coverings and purchasing of eco-friendly bamboo single use cutlery instead of plastic.

The SLCC has also noted long-term effects in sustainability as remote working has encouraged greener working behaviours and the SLCC has shifted processes from what was once paper heavy to digital. This is evident in external correspondence, as employees have moved where possible to sending emails and digital file sharing from the more traditional paper letter and post. The SLCC's annual spend on royal mail postage,

for instance is down 74% in 2020 which in turn has had a knock-on effect on paper and envelope reduction. These behaviours are classified as long-term as they will continue when the SLCC are back in the office.

C. Mainstreaming

The SLCC maintains its commitment to sustainability choices made in previous years, so we still have office plants that use peat free planting systems, our photocopier/printer paper is responsibly sourced and carries the FSC C008924 logo, and the 'think before you print' message is accepted into standard working practices. One example of mainstreaming is how our plastic cup consumptions has gradually reduced.

We continue to use a biodegradable brand of liquid hand wash in our kitchen area, which has reduced plastic consumption, and is releasing fewer chemicals into the water system. Similarly, switching from standard dishwasher tablets to a plant and mineral based version does not make a discernible difference to the cleanliness of dishes, but has reduced our environmental impact for some years.

We recognise that a positive way to move forward with our corporate approach to sustainability is to inform and support staff in their individual efforts to live more sustainably. For example, instead of putting empty coffee jars straight in the recycling bin, staff can then take the empty jars home to re-use for food storage



(therefore reducing their own plastic consumption) and we have a collection of plastic carrier bags in the kitchen, ready for re-use.

Staff organised their own collection point for disposable coffee cups (and rota for taking them to a suitable recycling point) and also recognised that non-confidential papers could be re-used to make

notepads, therefore helping us in our aim to reduce unnecessary paper consumption.

Whilst we are keen to reduce the waste that ends up in landfill by providing recycling points throughout the office, we have prioritised the reduction of single use plastics such as the purchase of water in plastic bottles in recent years and this is evident by a decrease in the number of kilograms collected in the current and previous reporting periods.

D. Working in Partnership

We continue to work with a local café for our catering requirements. Since 2011 deliveries have been made on foot and with minimal packaging and in 2016 our supplier agreed to provide whole pieces of fruit rather than mixed fruit pots in order to further reduce waste. Our milk supplier is a locally sourcing dairy and where possible we try to buy ad-hoc items from local shops rather than order for delivery so that we can reduce our carbon footprint. We also work with other businesses in the building to share resources and re-use items that

become available. Our stationery provider is ISO 9001 and ISO 14001 certified and has won awards for their own sustainability efforts. They also support our aim to reduce our environmental impact by providing environmentally friendly product options and bundling deliveries so that carbon emissions can be reduced.

E. Communication

Active participation in national campaigns such as Pass it on week, Earth Hour and Climate Week gives us a structured opportunity to refresh staff awareness of resource efficiency and sustainability issues. Our campaigns usually focus on changing behaviours (both at home and in the office) because we recognise that that is where real change stems from. We've used Climate week as a platform to collect data and suggestions from staff and Pass it On Week events such as book and DVD sales have highlighted opportunities for re-use while helping us raise money for our nominated staff charity.



We aim to reinforce the message that small changes can make a big difference to local communities and to the country and environment as a whole. In 2019 the physical noticeboard went digital to save on printing and paper use. In 2020, we have provided the online staff engagement platform Trickle which has allowed staff to share Green and energy efficient tips digitally when not in the office during Climate Change Week and more recently. We provide links to external organisations for further information and we undertake annual surveys on recycling and staff travel, so that we can report back to the team on our progress.

We have also tried to find different ways of awareness and participation. As part of Climate Week 2019, staff attended a workshop on Food Waste held by Love Food Hate Waste initiative and contributed enough money towards planting two trees in the Scottish Highlands. In 2020 as staff were participating from home, the focus was mostly how staff could be more sustainable at home and there was an online workshop set up for mending clothes.

F. Highlights and Aims for the Future

Following the shift in working behaviours associated with remote working, such as paperless, email instead of postage and digital file storage instead of paper files and the reduction in travel particularly for meetings, we aim to encourage staff to keep up with these behaviours when returning to the office.

The SLCC's highlight of the past three years (in normal working) is the way in which staff have embraced a culture of reducing consumption, re-using items and recycling where necessary. This has been clearly reflected in small changes to our way of working and the staff-lead actions taken during the period.

Whilst the SLCC now has a large majority of staff actively campaigning and participating in green behaviours, we aim to continue the awareness and participation for those not so engaged in the importance of sustainability. We will explore ways of how to encourage full staff participation in our ongoing quest to reduce consumption and introduce sustainability into all process of the SLCC.