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Independent evaluation of the Commission for a Sustainable London 2012

Final report

March 2013

Commission for a Sustainable London 2012
Independent evaluation

A final report by **CAG Consultants**

March 2013

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CAG Consultants

Founded in 1983, CAG Consultants is an independent, employee-owned co-operative. We provide support, policy advice and training in a wide range of fields relating to sustainable development and climate change, regeneration and stakeholder & community involvement. We deliver high quality, innovative and thoughtful work for our clients, who include government departments, local authorities, public agencies, the NHS and regeneration and community planning partnerships across the UK. We pride ourselves on our strong ethical approach and our commitment to social justice and improving and protecting the environment. For more information, see www.cagconsultants.co.uk

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1. Introduction

1.1 Background

London was the first Olympic and Paralympic Games host city to establish and fund an independent assurance body focusing on sustainability. The Commission for a Sustainable London 2012 (referred to in this report as 'CSL') was formed in early 2007 to provide independent assurance and commentary over the sustainability of the London 2012 programme and legacy, and to carry out stakeholder engagement. In December 2012, CAG Consultants was commissioned to carry out an independent evaluation of CSL, prior to the organisation being wound up at the end of March 2013. This report sets out the findings from this evaluation.

We would like to express our thanks to the many stakeholders who generously gave up their time to contribute to this evaluation, including a number of stakeholders who had already moved on to new post-Games jobs or were in the process of doing so.

1.2 Purpose of the evaluation

As stated in the specification, the evaluation of CSL was commissioned '*to ensure that there is clarity about the successes, learnings and any potential failings of this particular experiment in public policy'.* The overarching question set for the evaluation was whether the Commission has added any value to the 2012 programme that could not have been obtained through other available means. The specification also stated that the evaluation should identify the policy lessons gained from the experience of CSL for strategic assurance of major projects.

1.3 Methodology

The following objectives were agreed at the outset of the evaluation:

1. to assess, at a strategic level, the added value of the Commission to the 2012 programme;

2. to identify the dimensions of the Commission's role that offered relatively more or less value; and

3. to identify the policy lessons for strategic assurance of major projects.

The methodology comprised the following key elements:

1. desk review of key material, e.g. the Commission's publications, including the annual reviews, post-games report and commentary by external agencies;

2. in-depth stakeholder interviews with the CSL secretariat, commissioners, key stakeholders from the delivery bodies (LOCOG, the Olympic Delivery Authority (ODA), the Government Olympic Executive (GOE), the Greater London Authority (GLA) Group and the London Legacy Development Corporation (LLDC)) and a range of external stakeholders. Interviews with CSL's Chair, two members of the secretariat and two external stakeholders were carried out face-to-face, with the remainder carried out by telephone;

3. an online survey, to allow a wider group of stakeholders to be engaged; and

4. attendance at and observation of a Commission roundtable event to gain insights into working practices.

39 interviews were conducted and 34 survey responses received. The anonymity of interviewees and survey respondents is maintained in this report. Details of the organisations represented by the interviewees and survey respondents are included in appendix A.

For the purposes of this report, participants are categorised as follows:

1. secretariat (the current secretariat and former manager);

2. commission stakeholders (the Chair, Commissioners and Co-opted Experts);

3. delivery body stakeholders (ODA, LOCOG, GLA, GOE and LLDC);

4. government stakeholders;

5. host borough stakeholders;

6. media stakeholders; and

7. external stakeholders (non-governmental organisations (NGOs), consultancies, statutory agencies).

The evaluation was guided by an internal steering committee comprising London 2012 stakeholders, including one ex-officio representative of the Commission. A draft version of this evaluation report was also peer-reviewed by a panel comprising people who had no direct involvement with the Commission's work, namely:

• Darryl Newport, Director, Sustainability Research Institute, University of East London;

- Geoff Lane, Partner Sustainability and Climate Change, PwC; and

- Penny Shepherd, Chief Executive, UK Sustainable Investment and Finance Association.

This final report takes into account the comments on the draft report received from the peer review group, steering group and CSL.

1.4 Limitations of the evaluation

As a summative evaluation, this evaluation has inherent limitations brought about by the reliance on reports and stakeholder accounts of processes and impacts going back as much as 6-7 years, rather than any ongoing observation over time.

The evaluation has also been compressed into a very short period. The fieldwork was conducted over a 6-week period which included Christmas and New Year. This has limited the level of detail which has been possible in our analysis and, to some extent, the number and spread of stakeholders interviewed. The evaluation was commissioned in the final week of LOCOG's existence and after ODA had closed, meaning many key stakeholders were either moving posts or had already done so. Whilst, in spite of these constraints, we successfully managed to engage with a large and wide group of stakeholders, compressing them within this short period constrained our ability to follow up potential 'lines of enquiry' that emerged from one interview to another.

The evaluation is also based on a relatively limited review of written sources. We have not, for example, investigated 'audit trails' relating to CSL's recommendations to see how they were followed through and the impact they have had. Neither has any quantitative analysis of cost-benefit or cost-effectiveness been carried out due to the time and budgetary constraints.

Essentially the evaluation is, therefore, our synthesis of and reflection on the views of the internal and external stakeholders contacted. Whilst we have endeavoured, where possible, to explore the validity of the assertions made by stakeholders through the desk research and discussions with steering group members, a degree of caution has been necessary in drawing firm conclusions from this evaluation.

1.5 This report

In section 2 of this report, we provide some brief background information on the establishment, operation and activities of CSL. The findings from the evaluation are presented in the subsequent sections. In section 3, we discuss the added value of CSL to the London 2012 programme. In section 4, we explore delivery issues, i.e. what worked well and not so well and what might have been done to improve CSL. In

Section 5, we explore some of the wider lessons which can be gained from the experience of CSL. This is followed, finally, in section 6 with some conclusions from the evaluation.

2. Context

2.1 The formation of the Commission

London made a commitment to the International Olympic Committee (IOC) and the public to deliver the most 'sustainable Games ever'. The Candidature File[1] included a number of specific commitments about how this overarching goal would be delivered, including a requirement for the London Sustainable Development Commission (LSDC) to independently monitor the sustainability of the London Games.

A separate independent commission was eventually established to fulfil this commitment, with a direct reporting line to the Olympic Board. PricewaterhouseCoopers LLP, in conjunction with Forum for the Future and their London Sustainability Exchange programme, were commissioned to develop an assurance framework (CSL, 2007) and terms of reference (CSL, 2007a), which were agreed in late 2006.

2.2 Terms of reference

The terms of reference set out the following aim, goals and role for CSL.

Aim

To provide independent assurance and commentary in order to enable the sustainability objectives of the London 2012 programme to be achieved and to support a sustainable legacy.

Goals

The key goals of the Commission are:

* *To provide the Olympic Board and other stakeholders with commentary, supported by objective evidence, to demonstrate whether Key Stakeholders have:*

    * *Robust plans and processes are in place to deliver SD objectives*

    * *Objective evidence that SD Objectives are being achieved*

    * *SD plans and performance to support a sustainable legacy*

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[1] London 2012's bid document to the International Olympic Committee, available at http://www.london2012.com/about-us/publications/candidate-file/

- *To provide a credible point of reference for all stakeholders, with respect to SD assurance issues.*

Role

The Commission's role is intended to be at a strategic level, acting as an advisor to the Olympic Board and a "Critical Friend" to Key Stakeholders.

The Commission will operate within the agreed Assurance Framework, which is intended to enable the Commission to provide stakeholders, most notably the Olympic Board, with an independent view on the sustainability status of the Games. This will be achieved through the review of definition, plans and progress with respect to SD objectives. In addition, the Commission will provide a valuable source of expertise and advice to Key Stakeholders, facilitating achievement of a sustainable programme and legacy.

2.3 Structure, management, funding

Reporting Line

CSL reported to the Olympic Board (jointly chaired by the Mayor of London and the Secretary of State for Culture, Media and Sport).

It was hosted by the GLA and based at City Hall but operated as an independent commission in accordance with its own Terms of Reference.

Funding

CSL was jointly funded by:

▪ LOCOG (30 per cent);

▪ the Olympic Delivery Authority (ODA) (30 per cent);

▪ Greater London Authority (GLA) (20 per cent); and

▪ the Government Olympic Executive (GOE), which was part of the Department for Culture Media and Sport (DCMS) and co-ordinated Government activity in respect of the 2012 Games (20 per cent).

Composition

CSL was led by a paid, part-time Chair, Shaun McCarthy, with a team of unpaid Commissioners and Co-opted Experts who provided expert advice and, to some extent, advice on its functions. The Commission was supported by a secretariat, initially comprised of three people. From April 2012, to cope with additional demand for

communications and administration during the Games, a full-time administrative assistant was added to the team, which allowed the previous administration and communications officer to focus on communications full-time.

Assurance framework

The assurance framework *'outlines the governance, planning, information gathering and reporting processes which CSL will undertake on an annual basis'* (CSL, 2007).

The framework set out a cyclical process of assurance, starting with a review of the overarching governance of the Games programme and strategy for sustainable development issues, followed by a planning stage to identify specific sustainable development issues for review, information gathering, analysis and then reporting to the Olympic Board and stakeholders.

An overview of the assurance framework is shown on the following page (it should be noted that this reflects early governance arrangements for London 2012 which subsequently changed).

Between November 2007 and November 2012 CSL published:

- five annual reviews, the first of which specifically focused on governance arrangements;
- 13 thematic reviews, covering:
    - o Reporting
    - o Design
    - o ODA procurement
    - o Skills, employment and business capacity
    - o Carbon measurement and management
    - o LOCOG procurement
    - o Waste and resource management
    - o Food
    - o Biodiversity
    - o Inclusion and healthy living
    - o Legacy
    - o Games preparations
    - o Post-Games report;
- Two shorter 'snapshot' reviews, covering:
    - o Transport

- o Merchandise;
- 26 official statements; and
- 235 recommendations.

Figure 1: Overview of the assurance framework

ANNUAL

REVIEW OVERARCHING GOVERNANCE ARRANGEMENTS AND SD STRATEGY (Section 4.1)

Governance
- Review documents.
- Conduct interviews with Olympic Board, OBSG Sustainability Group, OPSU and delivery bodies.

SD strategy
- Review the overarching SD plan and delivery body SD plans, where relevant.

External perspectives
- Understand external views through discussion with stakeholders and media review.
- Consider responsiveness of governance arrangements and plans to external perspectives.

Discuss findings with OBSG Sustainability Group and report to the Olympic Board

PRIORITISATION (Section 4.2)
- Confirm understanding of issue boundaries and definition.
- Assess the inherent risk of issues.
- Determine high, medium or low risk rating.

UNANTICIPATED ISSUES (Section 4.7)
- Respond to unanticipated issues identified by the delivery bodies or other stakeholders.

ONGOING

Planning (Section 4.3)
- Receive and review programme reporting for each of the delivery bodies via OPSU.
- Update the review programme to reflect information received.

Planning (Section 4.3)
- Develop the review programme including:
  – which issues will be subject to review,
  – when reviews will take place,
  – which organisations will be within the scope of review, and
  – which Commissioners will lead each review.
- Discuss the programme with the delivery bodies.
- Submit the programme to the OBSG Sustainability Group for review.
- Submit the programme to the Olympic Board for approval.

Information gathering (Section 4.4)
- Prepare questions and share with the delivery body in advance.
- Interview the relevant contact within the delivery body to understand governance of the issue, delivery risks, plans, policies and procedures, and information and monitoring arrangements.
- Obtain supporting evidence, for example, procedural documents, plans, audit reports, monitoring data, etc.

Reporting (Section 4.6)
- Participate in bi-monthly OBSG Sustainability Group meetings, as required.
- Provide reporting to the Olympic Board as follows:
  – Quarterly progress update and reporting on completed reviews, and
  – annual overview and summary report.
- The summary report will include by-issue reporting as follows:
  – findings and recommendations,
  – areas of good practice,
  – RAG assessment, and
  – significant matters identified falling outside the scope of review.
  - All reporting will be discussed and agreed with the delivery bodies and presented to the OBSG Sustainability Group prior to reporting to the OB.
  - Annual and ad-hoc reporting will be issued to wider stakeholders following discussion with the Olympic Board.

Enquiry and analysis (Section 4.5)
- Review information obtained and assess the need for further enquiry.
- The nature and depth of further enquiry will be based on the level of risk and significance associated with the issue, and sufficiency of evidence provided.
- Determine an initial RAG assessment of performance.
- Discuss and confirm findings with the relevant delivery bodies, agree actions and recommendations, and finalise RAG.

OPSU Programme reporting

Reporting

Planning

Information gathering

Enquiry and analysis

3. Added value

3.1 Sustainability

This section explores the added value of CSL in terms of the sustainability of the London 2012 programme. The uncertainty surrounding the level of added value is discussed first. This is followed by a description of the principal mechanism by which added value appears to have been achieved, i.e. providing leverage on sustainability issues within the delivery bodies. Some examples of added value which have been attributed to CSL are then given. Finally, stakeholder concerns about the scope and focus of CSL's action on sustainability are discussed.

What level of additionality?

It is now widely reported that London 2012 was the most sustainable Games ever. A very wide range of organisations contributed to this. Much happened as a result of the commitment and initiatives of the delivery bodies themselves, and other organisations played significant roles. Isolating the precise role played by CSL is, therefore, far from straightforward.

There is no counterfactual against which we can compare the programme, so we do not know, for example, what the delivery bodies would have done anyway and it should be noted that the London 2012 programme had ambitious sustainability goals from the outset.

Furthermore, we can only speculate as to what different roles external organisations would have played in the absence of CSL. Some NGO stakeholders suggested they may have got more involved in the programme, pressuring for action, had CSL not been there.

The level of additionality provided by CSL is therefore uncertain. However, amongst the delivery body stakeholders we contacted the vast majority felt that CSL added significant value to the sustainability of the London 2012 programme.

> We already had our commitments and had our eye on the ball with sustainability, but the Commission helped to remind us of our commitments, point out gaps and their huge wealth of expertise was a big help in making the Games as sustainable as possible.

> [Delivery body stakeholder 15]

Only one delivery body stakeholder raised any doubts about whether CSL had materially impacted on the overall sustainability of the Games. This was on the grounds that a direction of travel with regard to sustainability had already been set.

Sustainability outcomes were achieved both through formal reviews and recommendations and, as discussed in 4.1, the linked, but more informal, advice provided in their role as 'critical friend'. Outcomes achieved via the latter are far harder to track and quantify.

In the early period of CSL, as set out in the assurance framework, the focus was on ensuring that sustainability was embedded within the overall governance arrangements and strategy for London 2012. The impact of this 'embedding' activity is also extremely difficult to quantify, particularly retrospectively, but in helping to build understanding of sustainability and establishing a direction of travel, it may well have been significant.

Where added sustainability value was achieved through behind-the-scenes activity or through sustainability being more effectively embedded in governance and strategy, it is likely to be hidden from view. Furthermore, there is a clear sense in which the mere presence of CSL impacted on the culture and attitudes of the delivery bodies throughout the programme. LOCOG's post-Games sustainability report affirms this, stating that '*[the Commission's] continual presence and scrutiny across the programme has helped all the delivery bodies raise their game*' (LOCOG, 2012, p12). Similarly:

> *CSL's existence meant sustainability was under a stronger spotlight and constantly reviewed.*

> [Delivery body stakeholder 8]

Leverage

The evidence suggests that that CSL provided leverage within the delivery bodies to influence senior managers and decision makers on sustainability issues. As David Stubbs' (LOCOG) case study of CSL suggested, '*CSL helped internal sustainability teams in LOCOG and the ODA leverage senior management attention and action. It was a very useful 'stick' with which to get Directors to focus on sustainability issues and to agree to implement programme requirements. This leverage was especially important in the early years of the programme when core governance and processes were being put in place*' (Stubbs, D, 2012, p.4-5).

This view was echoed by three other delivery body stakeholders. For example:

> *Their role was important in getting internal buy-in in some areas. Having an independent body that reports and engages with stakeholders was useful and critical to my internal work as it added an extra weight.*

> [Delivery body stakeholder 2]

> *It helped to raise the profile … partly because of CSL's strong links to the media. CSL commentary could affect our reputation, which resulted in internal players taking an active role, who might not otherwise have done so. CSL was capable of pushing key things through … They created a reputational risk for organisations of*

NOT doing things that CSL recommended – this was very powerful and resulted in things happening that would otherwise not have happened.

[Delivery body stakeholder 12]

Examples of added value

The tracking of progress with regard to CSL's recommendations, a function carried out by CSL, provides an overview of the number and range of issues which CSL sought to influence. It has not been within the scope of this evaluation to analyse the precise role of these recommendations, along with other CSL activity, in securing sustainability outcomes. However, some of the language used by CSL in reporting on these recommendations suggests that in some cases it is likely that action would not have been taken without their intervention. For example:

Following a distinct reluctance to set specific targets LOCOG responded to this recommendation and developed targets for key areas… (CSL, 2012, p3)

Initially the Commission was informed that it wasn't worth spending resources on monitoring sustainability criteria. After significant pressure by the Commission and recommendations such as the one listed [That City Operations urgently develop a clear set of targets, objectives, plans and procedures to comply with BS 8901 and to meet LOCOG's sustainability standards], the GLA seconded sustainability resources into City Operations during 2011… (CSL, 2012, p4)

This is also reflected in some of the comments from delivery bodies:

They helped us and pushed us… we may not have taken it so far otherwise… they really did press us.

[Delivery body stakeholder 14]

If Shaun [the CSL Chair] put three areas for improvement into his reports, we made damn sure we dealt with them. Their views were in the public domain - so we dealt with them.

[Delivery body stakeholder 4]

In addition, the interviews and survey highlight a number of examples of sustainability outcomes which stakeholders attributed – at least in part - to the actions of CSL. These include:

• The development by LOCOG of a suite of specific sustainability targets for key areas including venues, technology, logistics, air quality, ceremonies, catering, cleaning and waste.

- The Olympic Board agreed a policy on the use of hydroflourocarbons (HFCs[2]). This had a presumption against the use of HFCs unless there were environmental, technical or economic reasons for their use. This led, for example, to a decision not to cool the Aquatics Centre with HFCs, but to employ ammonium cooling instead.

- London 2012 published a materials policy statement, for mitigating the impacts of the manufacture, use and disposal of temporary materials and for dealing with environmentally sensitive materials such as PVC through the design and supply chain process. The secretariat point to knock-on effects in the supply chain from the implementation of these policies.

- A commitment was made to 'take reasonable endeavours to reuse or recycle at least 90 per cent, by weight, of the material arising from the installation and deconstruction of its temporary venues and overlay'.

- A full Games reference carbon footprint was developed, including the embodied emissions in the construction process.

- LOCOG adopted CSL's definition of a sustainable job in its employment and skills strategies. In addition, the LDA acknowledged the definition by shifting their use of 'sustainable' to 'sustained' jobs when referring to jobs lasting more than 6 months.

- The GLA seconded sustainability resources into City Operations during 2011 to develop a sustainability plan and to implement a BS 8901-compliant management system. Certification to BS 8901 was secured and targets were set for a range of sustainability measures. In turn, this led to improved outcomes such as zero waste to landfill from the live sites and a sustainable food sourcing system at Potters Field, the site of the Olympics Festival.

Scope and focus

Whilst the vast majority of stakeholders contacted believe that CSL added value to the sustainability of the Games, some stakeholders raised questions about the scope and focus of CSL's activity. Some of this was driven by dissatisfaction relating to single issues of concern which they feel were inadequately addressed by CSL, e.g. biodiversity, clean air, workers rights, sustainable food or Dow Chemical's sponsorship of the stadium wrap (although it should be noted here that most NGOs felt that CSL were effective in acting on issues of concern to them).

Others suggested more generally that CSL focused on the environmental aspects of sustainability at the expense of the economic and social aspects. For example:

> *I think the Commission's existence and its 'background presence' in holding the ODA and others to account (albeit very gently and with great political restraint),*

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[2] gases used in refrigeration and air conditioning with significant global warming potential

as opposed to any particular activity, probably served to keep sustainability further up the agenda when the serious 'cost engineering' of the Games began than it would otherwise have been. However the Commission was arguably more successful on the 'designed and built' aspects of environmental sustainability targeted by the first three of its five priorities than on the latter two[3], which I would suggest were probably of greater interest to many of the commission's members but were generally set aside by the ODA and very much lacking in agency by comparison.

[External stakeholder 26]

The biggest thing [they didn't do well] and the thing that's been apparent throughout is the focus on environmental issues. Often found myself frustrated that they didn't address the social and economic aspects of sustainability better. Don't know if it was about direction provided by Commissioners or the staff.

[Delivery body stakeholder 14]

According to CSL, London 2012's performance was better on environmental than ethical issues and the above frustrations may be a reflection of this. Such views do not appear to be borne out in terms of the subjects of CSL's reviews (which included, for example, reviews of healthy living & inclusion and skills, employment & business capacity) but it has not been within the scope of this evaluation to assess in any detail the balance of CSL's focus in their reviewing, reporting and other activity. However, one of the secretariat suggested that this imbalance may have been reflected to some degree in the nature of their stakeholder relationships, brought about partly by external perceptions of what sustainability means being limited:

It's fair to say that our engagement with social and economic NGOs was less productive than with environmental NGOs… although this may have stemmed as much from their perception of the boundaries of sustainability.

[Secretariat 3]

One external stakeholder also suggested that it was reflected in the balance of expertise incorporated within CSL. Specifically, it was suggested that the Commission should have included a Commissioner with labour rights and supply chain expertise from the outset. A commissioner with expertise in this area was appointed in the third round of commissioner appointments in April 2010. The first group of Commissioners, appointed in 2007, brought expertise spanning urban and social regeneration, diversity

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[3] The five themes were (1) Climate change, including minimising the carbon footprint of the Games, (2) Waste, including minimising waste at source, diverting waste from landfill, and facilitating long-term individual behavioural change, (3) Biodiversity, including enhancing the ecology of the Lower Lee Valley and other London and regional 2012 venues, (4) Inclusion, including promoting access, celebrating diversity and facilitating the physical, economic and social regeneration of the Lower Lee Valley and surrounding communities, (5) Healthy living, including inspiring people across the country to take up sport and develop active, healthy and sustainable lifestyles.

and inclusion, biodiversity, food, social housing, healthy living, energy and carbon, disability and access, air quality, community engagement, sports and community regeneration.

3.2 Finance

A full assessment of whether CSL added value to the London 2012 programme in financial terms would require detailed cost-benefit analysis, which has not been within the scope of this evaluation. Instead, we set out below:

*   the direct costs of CSL;

*   stakeholders' views on the indirect costs of dealing with CSL and following through on their advice and recommendations; and

*   the financial savings generated by the presence and actions of CSL.

Direct costs of CSL

Particularly in the context of the overall London 2012 budget, the direct costs of CSL were very small. Over the 7-year period in which CSL will have operated (2006/7 – 2012/13), total expenditure will be approximately £2.1m. This equates to approximately £300,000 per year, although the level of expenditure has varied significantly from year to year.

A large number of stakeholders felt that CSL represented excellent value for money. For example:

> *'The lifetime cost of CSL was approximately £2 million. This was shared across four organisations collectively responsible for a programme in excess of £11 billion. This was a minute fraction of the overall programme budget (0.02 per cent) and given the notional savings that can be offset from avoiding certain consultancy and auditing services, and the de-risking of reputation issues, CSL represented excellent value for money' (Stubbs, 2012, p7).*

Indirect costs of dealing with CSL and following through on their advice and recommendations

It has not been within the scope of the evaluation to determine the indirect costs of CSL. However, one delivery body stakeholder suggested that engaging with CSL and following through on their recommendations incurred some costs:

It is hard to say [whether CSL added financial value to London 2012] The Commission did sometimes help add value but often engagement with the Commission added a lot of time on our part and additional consultant cost.

<div align="right">[Delivery body stakeholder 16]</div>

Only one example of significant indirect costs resulting from CSL's recommendations was given. This related to the retrofit of HFC-free air conditioning to the aquatics centre. CSL's recommendation that a policy restricting the use of HFCs be developed, resulted in the need for a switch to a HFC-free design for the aquatics centre, which added a significant sum to the construction costs of the scheme.

However, whether these are considered to be additional costs or necessary costs depends, of course, on your view of the importance of the issue. Furthermore, in examples such as this, CSL argue that much of the additional cost could have been avoided had a decision been taken on use of HFCs earlier. The recommendation to address HFCs was in CSL's first report, *On Track for a Sustainable Legacy*.

Savings generated

The evidence highlighted a number of areas in which CSL may have generated cost savings:

1. In providing technical advice to the delivery bodies that would otherwise have had to be paid for:

   'For the public bodies in the London 2012 programme in particular (ODA, GLA and central Government), CSL's assessments on specific technical issues represented considerable cost savings. Without CSL, the normal recourse would have been to appoint consultants. In addition, while the sustainability assurance carried out by CSL did not preclude the need for other auditing services, it did remove the need for standard verification statements in the London 2012 Sustainability Report' (Stubbs, 2012, p.5).

2. The stakeholder management elements of CSL's role, discussed further in 3.5, appear to have led to significant cost savings for the delivery bodies:

   Without the Commission in place, LOCOG would have had to deal with the disparate sustainability stakeholder community at large on a regular basis, responding to queries and dealing with sustainability issues raised by these organisations. CSL removed the need for LOCOG to do this, enabling them to concentrate on the effective of delivery of the Games. It's hard to put a figure on the financial value this brought, but I think it was significant.

<div align="right">[Delivery body stakeholder 15]</div>

ODA and GLA representatives made similar comments, with one GLA stakeholder suggesting that they would have needed an additional full time post just to deal with sustainability queries had CSL not been there.

3. It is well understood that, particularly in relation to construction, the earlier sustainability is considered in the design process, the cheaper it is to achieve sustainable solutions. Two delivery body stakeholders suggested that CSL's work helped to ensure that sustainability was factored into the design process at an earlier stage than might otherwise have been the case. For example:

   In construction and development, the earlier you decide on measures (e.g. rainwater harvesting), the cheaper it is. So the work they did on early specification of sustainability measures meant that these could be delivered at a cheaper price. If sustainability had been an after thought, or CSL had come along three years into the project, we would have had a much more antagonistic relationship [because it would have been more costly to take sustainability on board]. I can't quantify it, but CSL's early work was crucial to the economically feasibility of sustainability measures.

   [Delivery body stakeholder 4]

4. Some specific actions which CSL pushed for are quoted as having saved significant sums of money. For example, Government stakeholder 1 suggested that the decision to decontaminate soil by washing on-site, a decision which CSL is said to have influenced, saved approximately £68m compared to the landfill cost.

3.3 Governance

This section explores the different dimensions of the added value which stakeholders have suggested CSL brought to the governance of the London 2012 programme, namely:

1. coordination and integration between the delivery bodies;

2. brokering solutions; and

3. allowing the delivery bodies to focus on delivery.

Coordination and integration between delivery bodies

The secretariat suggested that their programme-wide overview of London 2012 enabled them to identify issues that were at risk of falling between multiple organisations and not being effectively addressed. Examples given include:

1. Persuading the delivery bodies collectively to see carbon as a strategic issue. This led to the commissioning of the first comprehensive carbon footprint to include embodied carbon.

2. The last mile (the area from a transport hub to a venue), a space in which many organisations were responsible for different aspects of sustainability (and other) issues. In addition, the organisations involved varied from venue to venue. CSL recognised that there was a serious risk of inconsistency of approach, with:

   • varying standards from venue to venue;

   • varying standards from inside and outside venues; and

   • with the Olympic Park, varying standards outside different exits from the Park.

   They recommended both in their waste review and then in their sustainable games preparation review that LOCOG take a lead in this area, to co-ordinate action around all its venues, and for TfL to take a lead in the central London area. CSL suggest that there was evidence of good co-ordination in some of these areas during the Games.

3. Waste management in the dismantling of temporary facilities and transformation of the Olympic Park. In their waste review, CSL highlighted that there would be:

   • contractors working for LOCOG 'bumping out';

   • other contractors from LOCOG removing temporary overlay;

   • another set removing LOCOG temporary venues;

   • a further set removing ODA temporary venues, some of which GOE had responsibility for finding reuse options for; and

   • contractors beginning the site transformation.

   CSL suggested that there was a risk that waste would often be seen, deliberately or otherwise, as someone else's responsibility, and that the targets for reuse and recycling would be at significant risk if the ODA, LOCOG and GOE (and then LLDC when they took on the transformation role) did not properly co-ordinate and manage the process. The waste review recommended that the London 2012 Sustainability Group take on a co-ordination role. This is reported by CSL to have led to a good level of co-ordination of waste management and to have contributed to targets being achieved.

4. Skills and employment. CSL suggest that their review of this area was widely recognised amongst the people involved with the Games as being the first time

anyone had been able to take a whole programme view of the issues and opportunities and to bring them together into a single report. CSL suggest that this enabled them to see the complete picture, realise some of the opportunities and see the potential for greater joint working. It made a series of recommendations including provision of a single point of access for prospective employees and the development by LOCOG of a strategy to provide employment opportunities for residents in the five Host Boroughs. CSL report that these issues were addressed and the programme was able to benefit from it.

5. The management of legacy in the Lea Valley. This was covered in CSL's Legacy review where they recommended that: key East London organisations come together to formulate a community of practice and a critical path for meeting wider legacy aspirations and initiatives; and a future-proofing strategy for the entire Lee Valley be commissioned that actively identifies and removes road-blocks to the whole river-valley becoming a single, sustainable, urban, green infrastructure system with enhanced economic, social and environmental outcomes and amenity. The aim was to try to ensure that a broader view be taken by those responsible for different areas of the Lea Valley in order to deliver a more comprehensive outcome. It remains to be seen if this will happen going forward.

Although we did not receive comments on this from delivery body stakeholders, some external stakeholders felt that CSL contributed these sorts of benefits to the planning and delivery of the Games. For example:

> *One of the issues for the games bodies was that silos existed between ODA, LOCOG etc. The Commission did a lot to bang heads together and get people to work together on solutions.*

[External stakeholder 35]

Brokering solutions

Three of the external stakeholders we interviewed felt that CSL played an important role in terms of brokering solutions on issues of importance to the NGOs. One NGO stakeholder referred to CSL's role in brokering solutions in relation to energy and emissions and suggested that they generally found it more productive to take their issues to CSL rather than directly to the delivery bodies, as they found them to be an 'honest broker' who would 'sweat the issues' on their behalf [external stakeholder 29].

Allowing the delivery bodies to focus on delivery

Linked to the previous point, as discussed in 3.5 and 3.6, CSL also played a critical role in stakeholder management, which contributed to the delivery bodies being able to concentrate on delivery.

> *Its [CSL's] existence helped to reassure the general public, special interest groups and other external bodies. In the absence of CSL, the Olympic partners may well*

have faced more challenges and these could have become a source of unhelpful distractions.

[Delivery body stakeholder 1]

The biggest value that I got was that they [CSL] were there as an interlocutor. It meant the project timetable wasn't adversely impacted by single interest organisations.

[Delivery body stakeholder 7]

3.4 Knowledge promotion and best practice

CSL have played a significant role in ensuring that the learning gained from London 2012 is recorded and shared. They made recommendations to the ODA about developing a learning legacy and their 2012 Legacy review included the recommendation that '*LOCOG, with appropriate support from Government, creates its own learning legacy that can be shared publicly beyond the IOC family to the events industry more broadly so as to optimise the public and private sector investment in the 2012 Games and its impact on major events in the UK and worldwide'* (CSL, 2012d, p4). Initially, LOCOG indicated that it had limited resources to meet this requirement but would be willing to work with others should resources be forthcoming. However, LOCOG has now produced its learning legacy material and this has recently been uploaded to the learning legacy website. The website includes short reports, tools and templates, case studies and research summaries that document how the work for London 2012 was approached, the lessons that have been learned and the successes that could benefit others. The material is arranged across ten themes, one of which is sustainability.

CSL's publications are also an important part of the learning legacy of London 2012. Since CSL were the first independent body to provide sustainability assurance for an event on the scale of London 2012, their body of work is unique. They reported that their post-Games report has been downloaded over 1000 times and their waste review over 3000 times.

A minority of stakeholders suggested that CSL missed an opportunity to encourage knowledge promotion amongst the wider public, although it should be noted that this was not part of CSL's remit. Others set this within a wider perceived failure to effectively communicate sustainability messages as part of the Games. It should be noted however, that in spite of public knowledge promotion not being part of their remit, CSL did generate considerable public interest in their work, including during Games time. For example, CSL's records suggest that:

• 89 pieces of Commission-focused media items were published by external media providers during games time;

- there was a 200% increase in traffic to their website during Games time (9,266 visitors) based on comparison to the same period in the previous year;

- a video about CSL was produced and launched during Games time (with 581 views in total to date);

- 36 blog posts were made; and

- 6 news pieces were released.

Games-time sustainability communications was also an issue considered as part of CSL's post-Games review, which included drawing out lessons for the future.

3.5 Managing expectations of external stakeholders

CSL maintained a large database of external stakeholder organisations, with whom they were in regular contact. There were four main forms of engagement with stakeholders:

- as part of annual stakeholder consultations, which attracted between 21 and 63 stakeholders per session;

- as part of preparing specific reviews;

- one-to-one meetings between the Chair and individual stakeholders (these averaged about 15 per month); and

- and a regular newsletter.

CSL refer to the development of 'trusted relationships' with the NGOs in which they were able, to a degree, to engage them in the process of developing their advice and recommendations on some key issues.

The majority of external stakeholders contacted as part of this evaluation very much welcomed this aspect of CSL's work. For example:

> It avoided a stop-start approach to engagement.

> [External stakeholder 7]

Much of CSL's stakeholder engagement was about managing expectations, e.g. working with stakeholders to understand what could realistically be achieved in terms of clean air, energy or materials. In doing so they acted as a 'buffer' between the external stakeholders (particularly the NGOs) and the delivery bodies. This role has been highly valued by the delivery bodies.

'From the perspective of the London 2012 delivery bodies… they successfully managed to filter stakeholder issues – particularly among environmental NGOs – to the extent that CSL rapidly became the primary go-to body. This meant less time and effort being spent on dealing with disparate stakeholder issues, a point recognised by the Sustainability team in the Vancouver 2010 Organising Committee, who remarked they wished they had had a CSL equivalent to help manage all the pressure groups they were confronting' (Stubbs, 2012, p4).

We had very few major sustainability bodies who were directly critical. The media was primarily managed through CSL and, given the huge scale of the games and the public and media interest, this was in general handled well.

[Delivery body stakeholder 13]

We didn't get huge amounts of questions, NGO pressure etc, because they knew they could go to the CSL and get an honest answer.

[Delivery body stakeholder 7]

The value added by CSL in terms of stakeholder relations is likely to have been significantly heightened by the fact that they appear to have taken a very different approach to communications compared to the delivery bodies. CSL talked about operating in a 'positive comms environment', i.e. maintaining close, two-way relationships with the press and stakeholders, with the delivery bodies generally being more closed. This is reflected in some of the comments of external stakeholders and the media:

They [CSL] were a source of reliable, credible information that was not so readily available from LOCOG. They were very helpful… We never really got LOCOG's voice on some of these issues… The Commission was effectively providing information on what was going on within LOCOG. LOCOG's policy was 'not to talk'. They went to ground when big issues blew up. So the Commission helped the public understand what was going on.

[Media stakeholder 1]

One of the frustrations about covering LOCOG was access to them. They were quite impermeable. So having anyone who could hold them to account was useful.

[Media stakeholder 2]

3.6 Credibility and reputation

The vast majority of stakeholders, including delivery bodies, Commissioners and external stakeholders, felt that CSL also added value to the credibility and reputation of the programme.

Absolutely [the Commission added value in terms of credibility and reputational value]. Their approach was very structured, debate was very thorough and they were very professional. Their reports were also taken very seriously by the public which meant that public trust was high as was public interest. Part of that is due to the transparency and the credibility of the people involved in the Commission.

[Commission stakeholder 4]

The independence of CSL and their credibility in the eyes of external organisations, including the press and third sector bodies, was important in helping to reassure external stakeholders that sustainability was being taken seriously. The commission also played a valuable role in relation to special interest groups (e.g. environmental NGO's), engaging with such groups on sustainability issues and taking account of their concerns without becoming compromised by any political agendas.

[Delivery body stakeholder 1]

I suppose they did [add value in terms of the credibility and reputation of London 2012], because from a public and media point of view, we knew there was someone there to hold the Olympic bodies to account… The Commission did give the Games extra credibility. It was good to know that a body was keeping an eye on these issues. This added credibility to LOCOG too.

[Media stakeholder 2]

It [CSL] disposed a lot of the stakeholders, particularly the NGOs, particularly the NGOs who were coming at it from a fairly negative and hostile position, that there was a reputable, reliable, third-party bunch of people there keeping the Olympic bodies under some kind of scrutiny. And I talked to quite a lot of them through the period of the build up the games and so on. And without exception they all thought it was good thing the commission was there… They felt that it was a very strong reinforcer of credibility for the whole sustainability performance story.

[External stakeholder 18]

The fact that CSL gave the programme greater credibility from a sustainability perspective was seen by many to have been a key contributor to the absence, in the main, of negative coverage of the Games from a sustainability perspective. This was reflected in the comments of delivery bodies, the media, Government and other external stakeholders.

The issue over Dow was the only serious organised opposition to anything the Games were doing; compared to previous Games, that is remarkable. CSL played a key role in this.

[Delivery body stakeholder 8]

It avoided a stop-start approach to NGO engagement… I have a general feeling that they avoided a damaging spat with NGOs which could have been serious, either damaging the Olympic 'brand' or leading to a rowback from LOCOG on sustainability.

<div align="right">[External stakeholder 7]</div>

There was… a big issue about the Dow wrap. A lot of people were looking at this with raised eyebrows, and I think the Commission gave a bit of credibility to LOCOG on this issue… They did help because they provided another voice in the debate about things, an authoritative voice. They contributed greatly and added credibility.

<div align="right">[Media stakeholder 1]</div>

There were lots of stakeholders out there looking for problems. There were very few scandalous sustainability stories linked to London 2012, which is a testament to CSL. Environmental groups don't trust the organisers or central government. CSL maintained their independence. When they disagreed with something, it was in their reports. The CSL team were skilled at managing stakeholders.

<div align="right">[Government stakeholder 1]</div>

One external stakeholder suggested that CSL helped to maintain the Games organisers' credibility by restraining over-inflated claims about what was being achieved in terms of sustainability:

Nobody on the Olympic bodies fell into the temptation of over-claiming as to what they were doing because they knew the commission was there and could have the remit to and the right to kick in and say, "Nope… that is not what's happened." Now, that never happened as explicitly as that. There were times when over-claiming was questioned by the commission. So it reduced the risk of hype inside the Olympic bodies, which actually is a really important guarantor of credibility in a system like this.

<div align="right">[External stakeholder 18]</div>

4. Delivery

4.1 What worked well?

This section begins by setting out evidence for the apparent effectiveness of CSL in getting their recommendations listened to and acted upon. It then explores a number of characteristics of CSL which appear to be key to this, namely:

1. CSL's reporting line;

2. the combination of 'critical friend' and assurance roles; and

3. CSL's maintenance of a strategic approach.

Apparent effectiveness

As of November 2012 the Commission had made 235 recommendations. At the time of this report being prepared the status of them was as follows:

* complete – 93 (40 per cent);

* closed (either the essence of the recommendation has been achieved but not in the way in which it was originally envisaged and written or it has been superceded by a subsequent recommendation making it obsolete) – 77 (33 per cent);

* progress made – 41 (17 per cent);

* significant risk – nine (four per cent);

* no evidence yet – 10 (four per cent); and

* not achieved – five (two per cent).

Only around ten per cent of their recommendations had either not been achieved, were at significant risk of not being achieved or had no evidence yet to assess progress. Taken at face value, these figures suggest that CSL's recommendations have generally been listened to and acted upon by the delivery bodies and suggests that CSL did have leverage and influence over them, as discussed in 3.1.

The evidence points to a number of key reasons behind this apparent effectiveness and these are discussed below.

Reporting line

The ability for CSL to take issues to the highest level (i.e. the Olympic Board) when necessary appears to have been critical to their successes. This was built in to the assurance framework and terms of reference. Whilst the framework encouraged CSL to first seek resolution of issues with the delivery bodies themselves (see discussion of the 'no surprises' principle below), they were able to escalate issues to the Olympic Board Sustainability Group and the Board itself where necessary.

The Terms of Reference state that the *'Chair will meet the Olympic Board bi-annually or more frequently if there are issues of substance to discuss'*, and that the *'Chair will have access to the Chair of the Olympic Board to discuss urgent and important issues by exception'* (CSL, 2007). This mechanism was utilised, for example, in ensuring that appropriate policies were developed for the use of environmentally sensitive materials. The fact that CSL had this reporting line appears to have been significant in them gaining leverage with the delivery bodies.

Critical friend

The 'critical friend' role (more informal ad-hoc advice and support) played by CSL appears to have been highly valued by most of the delivery bodies.

> *They did act as a good critical friend – very important. My team knew about sustainability already but CSL gave confidence that we were on the right path. It is always good to have a sounding board and to be open to discussion.*

[Delivery body stakeholder 2]

Through achieving and maintaining the trust of the delivery bodies, CSL have been in a position to combine this critical friend role with their more formal strategic assurance role. In fact, their ability to provide credible, constructive advice appears to have directly contributed to their formal recommendations being listened to. CSL appear to have established their credibility from an early stage.

> *They did well overall as they built a reputation early on as an organisation that would act as a credible and independent critical friend… the Commission team gave [us] confidence in their actions. They also got the senior management engaged and trusting in their advice, allowing open dialogue. Trust is crucial in such instances.*

[Delivery body stakeholder 13]

Simply keeping confidences was also identified as an important element of building trust between CSL and the delivery bodies:

> *I needed to take Shaun into my confidence and needed to trust him. A good old-fashioned characteristic that is important. There is that personal aspect, an element of trust.*

<div align="right">[Delivery body stakeholder 9]</div>

The 'no surprises' principle (e.g. through sharing draft reports and raising issues in private in advance of publication) which was built in to the assurance framework also appears to have been critical in trust being engendered with the delivery bodies. On a number of occasions, this seems to have allowed a period during which CSL were able to (a) work with the delivery bodies to find a solution and (b) work with the external stakeholders to enable them to understand the issues. This seems to have been critical to achieving much of the added value that we have explored in this evaluation, i.e. not just enabling more sustainable outcomes but also aiding governance through brokering solutions, managing the expectations of external stakeholders and maintaining the credibility and reputation of the programme.

A specific example given by CSL and some delivery body stakeholders of where the critical friend role worked well is in relation to the ODA's cancellation of the planned on-site wind turbine. CSL were able to work with the ODA in advance of the cancellation being made public to identify alternative ways of meeting their overarching energy commitments, e.g. alternative on-site renewables, off-site renewables and on-site energy management. The fact that CSL were able to then subsequently voice their support for the alternative approaches put forward by the ODA is believed to have been of significant benefit to the ODA in terms of their stakeholder relations.

> *They did play an important role in brokering solutions e.g. when the Olympic bodies were unable to deliver a wind turbine in the Olympic Park as planned, the Commission helped them meet an appropriate solution that helped meet carbon target through local investment in domestic energy. This solution was ideal as it met concerns about high environmental standards but without leaving LOCOG facing undue costs… The CSL worked with ODA to resolve this and avoid problems with stakeholders.*

<div align="right">[Delivery body stakeholder 13]</div>

Whilst CSL and the delivery bodies generally appear to have found the combination of the roles of strategic assurer and critical friend to be mutually beneficial, one stakeholder questioned whether the two should have been combined because of the risk of the assurer becoming too close to the assured. This is discussed further in section 5.

Maintaining a strategic approach

Sustainability is a very broad topic and CSL's assurance framework recognises the importance of the organisation focusing attention on those areas with the most significant potential sustainability impact. Given the relatively limited resources

available to CSL and the pressures upon them from a wide group of interested stakeholders, maintaining a strategic approach was critical in terms of (a) not spreading their resources too thinly, and (b) maintaining the trust of the delivery bodies.

The assurance framework describes a process to be followed by CSL to identify material sustainability issues and prioritise which ones should be subject to detailed review. Based on this process, a 'materiality matrix' was subsequently developed to deal with emerging issues. This enabled the significance of these issues to be determined based on:

1. whether an issue is material to the delivery of the London 2012 programme (the relevance of the issue) and, if so;

2. its level of impact and urgency.

The matrix was used to assess issues relating directly to delivery as well as to reputational or value-based issues.

Particularly in the context of our comments on the resourcing of CSL (in section 4.3) we suggest that this careful and considered approach to filtering issues was an important aspect of CSL's effectiveness. Had they not maintained a strategic approach focused on the most significant issues, the quality of their assurance and advice would have deteriorated and they would have harmed their relationships with the delivery bodies.

There were occasions when delivery body stakeholders felt that CSL strayed beyond their brief, whilst a minority of external stakeholders felt that there were single issues that were missed or neglected. To some extent, this was probably due to the unprecedented nature of the organisation and its role. Strategic assurance of sustainability was a new concept. It is also a reflection of the fine lines that CSL had to tread between engaging effectively with external stakeholders and maintaining constructive relationships with the delivery bodies. However, on the whole, CSL appear to have got the balance right.

> *They made good decisions about deciding which topics to focus on for their reviews and how to prioritise.*

[Delivery body stakeholder 8]

4.2 What worked less well?

This section explores a number of aspects of CSL which some stakeholders perceived to have worked less well, namely:

1. the role of the Commissioners;

2. its level of boldness in dealing with the delivery bodies;

3. its resourcing for the event phase of the London 2012 programme;

4. the scope of its engagement with stakeholders; and

5. its ability to effectively address legacy issues.

The role of the Commissioners

The Commissioners' role was highly valued by the secretariat but one secretariat member also expressed some uncertainty about the level to which they could make use of them, given the voluntary nature of their positions and the limited time commitments they made to the role.

> *We knew the Commissioners were committing 20 days to the project and 12 of these would be taken up with monthly meetings. We knew that we were dealing with often very busy people and had to gauge the extent to which we would be able to involve them with a report / review / detailed issue. This meant that it could sometimes feel like we were asking a lot of them when we involved them in complex issues.*

> [Secretariat member 3]

As noted in the quote above, commissioners agreed to commit 20 days per year to their role. However, 12 of those were taken up by Commission meetings, and one Commissioner suggested that the 20 day commitment was unrealistic:

> *We committed to do 20 days a year, free of charge - a huge commitment, rather unrealistic. In practice it has been less: monthly meetings; meetings with external stakeholders etc. So, much less than 20 days a year - particularly recently.*

> [Commission stakeholder 3]

A small number of external and delivery body stakeholders expressed a view that the commissioners were too peripheral to the work of CSL:

> '*The group of Commissioners did not meet sufficiently often or have adequate oversight of the work of the secretariat. In reality, they were too far removed from the action. The scope and role of the Commissioners had been a matter of discussion at the time the Assurance Framework was drawn up, with some arguing for a stronger, remunerated role. In the end it was decided to have unpaid Commissioners who, as a result, would have more limited involvement in the programme' (Stubbs, 2012, p6).*

It is not clear that the Commissioners actually helped drive the agenda or were simply a sounding board.

[External stakeholder 35]

Generally however, the Commissioners themselves felt positive about both CSL and their role within it. One Commissioner referred to '*an occasional feeling among some of us (Commissioners) that we would put time into commenting on documents and sometimes our comments then seemed to disappear into a black hole, such that we weren't always sure if they'd been taken into account. And if not, why not?'* [Commission stakeholder 1]. This stakeholder went on to acknowledge that this was probably largely to do with the limited capacity of the secretariat to outline how their responses had been utilised.

Another Commissioner suggested that '*the Commissioners were not involved enough in the Commission's responses to difficult issues'* [Commission stakeholder 3]. However, following the Dow Chemicals issue, CSL developed a tight process for engaging with Commissioners on every emerging issue.

Particularly in the context of having a small secretariat, it may have been beneficial to have been able to make more extensive use of the Commissioners. Part of the explanation for the constraints on making more use of the Commissioners may lie in the number of Commissioners (12), which made it time-consuming for the secretariat to engage with them as a group.

Boldness and independence

Pragmatism is important, as recognised in the Terms of Reference, which state that '*The Commission will recognise the practical realities and challenges to hosting the Games, and recognise the need to integrate the economic, social and environmental, and other objectives for the Games'* (CSL, 2007). Striking the balance between idealism and pragmatism was clearly a constant challenge for CSL.

Some examples were given, including advice on the use of particulate filters on site vehicles. Although promoted by GLA guidance and supported by the Clean Air for London campaign, CSL supported the ODA's assessment that their cost effectiveness could not be justified. On other occasions they adopted views which were directly conflicting with the delivery bodies, and the delivery bodies would have appreciated a more pragmatic approach:

We did have times when CSL's position was in stark contrast to ours, which was not helpful. They could therefore have better appreciated the challenges of changing policy at a late stage.

[Delivery body stakeholder 13]

However, the general view amongst the delivery body stakeholders is that they got the balance right most of the time. For example:

They were not zealots but pragmatic, recognising time and financial constraints. CSL were chivvying, chasing, prodding but all the time trying to get improvement out of us. But it was not '0 to 100' but '0 to 10 this week and then more…'   They were not unrealistically idealistic.

[Delivery body stakeholder 4]

Some external stakeholders recognised the difficult balancing that CSL had to achieve:

Their approach was pragmatic rather than driven or campaigning. Often it meant that issues were resolved reasonably well but whether the outcomes were the absolute best for sustainability is more debatable.

[External stakeholder 35]

A minority, inevitably, felt that CSL had been overly pragmatic or cautious. For some, this simply related to dissatisfaction regarding particular issues, such as particulate filters for on-site vehicles or the Dow Chemicals stadium wrap. One Commission stakeholder, however, made a broader point, linked to questions of whether CSL was sufficiently independent of the delivery bodies to be able to be sufficiently bold in carrying out their assurance function:

We could have been more radical and ambitious in certain areas. That applies to the whole Games not just the Commission… Only 10 out of 80 merchandise lines came out of the UK. To some extent we were too deferential to the delivery bodies. .

[Commission stakeholder 4]

This stakeholder suggested that CSL was too deferential to the delivery bodies and questioned whether this was due to them being in constant fear of having their funding cut. The issue of funding and independence appears somewhat awkwardly in the media protocol within CSL's Terms of Reference:

'Affirming its status as an independent body, the Commission is jointly funded by the Greater London Authority group (Transport for London and the London Development Agency), the London Organising Committee for the Olympic Games, the Olympic Delivery Authority and the Department for Culture, Media & Sport and reports direct to the Olympic Board' (CSL, 2007).

It was suggested by Commission stakeholder 4 that it would have been better for the funding to have come wholly from Government, and from a department not directly connected to the delivery of the Games. They suggested that greater independence and an assured future would have allowed CSL to be more robust and confident in their

approach. It should be noted that CSL adopted a model which is similar to the private sector, on the advice of PwC, in which businesses pay for their auditors and independence is maintained through an independent reporting line.

CSL themselves acknowledged that they could have been bolder in their dealings on some issues. For example, they expressed some regret that they didn't push LOCOG harder on their merchandise supply chain, recognising that instead it took *'the release of an undercover dossier to push LOCOG into any action'* (LOCOG, 2012c). The statement goes on to say: *'The Commission pressed LOCOG for months over core issues including full disclosure of its supply chain… This is being corrected now and we welcome the action, but it could have been done last year'*.

This issue also relates to questions about the roles given to CSL in its Terms of Reference. Specifically, can a body which is acting proactively as critical friend to the delivery bodies, thereby needing to maintain close and constructive working relationships, also provide a sufficiently robust assurance function? Similarly, can a body which is seeking to provide a reference point for external stakeholders realistically maintain objectivity in its reporting and recommendations? One Commission stakeholder spoke about the risk of 'regulatory capture', i.e. being 'captured' by either the stakeholders or the delivery bodies.

CSL recognised these challenges. They talked, for example, of stepping in and out of their assurance role when dealing with the delivery bodies and of maintaining 'Chinese walls' between the staff carrying out reviews on particular topics and the staff providing more informal advice. They also talked about the challenge of not becoming too embedded with the delivery bodies and, conversely, not becoming a campaigning group for stakeholders.

Patently, these are difficult and precarious paths to tread. It is to CSL's (and, in particular, the Chair's) very great credit that they appear to have largely maintained constructive relationships both on the stakeholder and delivery body sides. It does, however, raise questions about whether it is realistic to expect future strategic assurance bodies to effectively maintain each of these different functions with a similar level of resources. This is explored further in sections 4.3 and 6.

Gearing up for the Games

LOCOG suggested that whilst CSL worked well during the construction phase of London 2012, the structure, processes and resourcing were inappropriate for the event management phase:

> *From mid-2011 (one year before the Games) there was a noticeable switch in focus from the conventional project management-based approach to assuring the construction programme, to the more fluid nature of event management. This brought in a broader spread of disciplines and interests: for example, marketing, sponsorship, retail, ceremonies, culture and education programmes, merchandise,*

> *brand protection, catering and temporary construction. This period also marked the start of official test events and Games Readiness testing. Allied to this was the massive expansion of LOCOG and the increasing pace and intensity of preparations for the Games (Stubbs, 2012, p6).*

They went on to suggest that this presented significant challenges in terms of the formal review and sign-off processes being too cumbersome, CSL being drawn into responding reactively to individual issues and being less objective and evidence-based in their reporting and communications.

LOCOG suggested that the root cause of this was that CSL was designed as *'a one-size-fits-all approach to cover two vastly different situations: a major construction project and a global mega-event'* (Stubbs, 2012, p6). They acknowledged that this might have been addressed, at least in part, if LOCOG had provided more structured training and briefings for the CSL team, particularly on Games operations. However, they concluded that insufficient effort was given to supporting CSL's readiness for the Games both in terms of the assurance framework, the nature of CSL's in-house skills and the overall level of resources available during the event phase.

CSL did adopt a very different approach to assurance during Games-time. This included:

* developing a detailed games-time schedule which included visiting every unique venue and some venues more than once;

* training (with LOCOG, the GLA and GOE in attendance for ISO 2012 1 and GRI EOSS);

* development of process flow assurance with LOCOG;

* rolling schedule of pre-games site based assurance with email reports back to LOCOG;

* Games time survey of visitors to London 2012 venues, including non-LOCOG venues, with more than 300 people surveyed; and

* accompanying SGS (LOCOG's assurers) on all day audit of the Greenwich Park test event to ensure that the two bodies' methodologies were aligning and to be clear about what the 2012 1 audit process would be focussing on.

However, CSL did refer to being significantly stretched in terms of resources during this period and acknowledged that the framework worked less well during the Games. This issue might have been addressed through CSL bringing in specialist staff on a temporary basis or through bringing in specialist consultancy support. However, the cuts to CSL's budget which were agreed in March 2011 made it more difficult for CSL to being in extra support during Games-time.

An external stakeholder working in the assurance industry concurred with this view, but sets it within a general issue of events not being seen as a discrete industry:

> *CSL did a better job around the construction phase. There were lots of sustainability stories related to the construction of the stadium and other venues which were communicated around the world. But not so much related to the event. I feel that CSL did not really understand the concept of an event. As a general rule, events are not seen as a discrete 'industry'.*

> [External stakeholder 14]

They went on to suggest that the principal gaps were in CSL not identifying the event industry as a key audience and not having sufficient expertise in relation to events. However, whilst none of the Commissioners were from the private events assurance industry, one Commissioner and two Co-opted Experts had very significant expertise in this area[4] and CSL's senior assurance officer had events and environmental auditing expertise from a local government background, including environmental site auditing. CSL staff also attended a 3-day training course in BS 8901 and GRI EOSS reporting, sufficient to be accredited as sustainability assurers under the AccountAbility scheme.

External stakeholder 14 suggested that the failure to properly understand and engage the events industry led to an opportunity being missed to pressure all of the Olympic sponsors to adopt ISO20121 which, they suggest, could have led to wider take-up within the UK. It should be noted that CSL did recommend that all organisations using the London 2012 brand should have consistent sustainability standards.

Stakeholders

We noted in section 3.5 CSL's extensive work with external stakeholders and the fact that this was widely lauded both by many of these external stakeholders themselves and by the delivery bodies. The following comments should be seen in that context.

CSL's own feeling that they could have done more to engage with social and economic stakeholders has already been noted. Others made wider points about the benefits which could have been gained by investing even more in engagement than CSL did:

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[4] Eleni Theodoraki is Professor in sustainable events management at Napier University, David Jackman was co-author of BS8901 for BSI and Jill Savery is the current Sustainability Director for the Americas Cup

More engagement work would have been useful but I'm not sure how they would have done it as they were very busy. There also could have been more listening to stakeholders, understanding their concerns and also explaining what the Commission was working on. In the end I think some stakeholders gave up on engaging, partly because CSL was trusted to be doing its job but in some cases because people felt left out.

[Commission stakeholder 4]

One external stakeholder who was in regular contact with CSL, whilst largely welcoming the role played by CSL, expressed a certain lack of clarity about the role they played, which suggests that CSL could have benefited from investing more resources in communication and stakeholder management, particularly during the early phases of CSL's existence:

It took a while to fathom out what their role was, as to how much oversight they had - to what extent they were inside or outside the tent… It was never clear whether they were an outside regulator of LOCOG (which they weren't really), or an inside adviser.

[Media stakeholder 2]

Dealing with legacy

The important post-Games role of CSL was clearly envisaged at the outset, with the Terms of Reference setting out a role for CSL up to 2014 *'to ensure that wider legacy benefits continue to be assured post Games'* (CSL, 2007). However, following a review of the Commission's role in early 2011, it was decided to cut short the lifespan of CSL and wind up the organisation in March 2013.

Although CSL carried out a review of the plans for legacy in 2012, it is unclear to us how an organisation with a lifespan to 2014, let alone to 2013, could have played an effective role in the strategic assurance of the legacy of the Games.

The importance of ongoing assurance is reflected in CSL's *recommendations finalisation project plan*, which provides an analysis of the current status of CSL's recommendations which remain open. It suggested that 18 (now reduced to 14) recommendations '*require a legacy owner if possible as they will need to be considered in the longer term (almost all of these relate to the work of the London Legacy Development Corporation)'* (CSL, 2012, p1). In addition, it suggested that '*not all of the further 12 recommendations earmarked for closure as a result of the Making a Difference review will end up being closed following it. If this is the case they will need to have potential legacy owners identified also'* (CSL, 2012, p1)*. The implication of this is that up to 26 recommendations will need to be adopted by a 'legacy owner', but it is unclear who will assure these in the absence of CSL.

4.3 What could have been done to improve CSL?

Building on the previous section, this section explores a number of aspects of CSL which might have been improved or which may need to be considered for future similar bodies:

1. appropriate resourcing;

2. greater independence;

3. a lifespan for legacy; and

4. a process of formative evaluation.

Appropriate resourcing

CSL are understandably proud of their achievements relative to their costs. They certainly appear to have punched above their weight, relative to the their incurred costs. This was largely due to the professionalism, expertise and dedication of the Chair and secretariat, which is widely recognised by stakeholders.

Finding an appropriate level of resourcing for this role is a fine balance. Had CSL been expensive or perceived to be in any way bloated, then this could have seriously undermined their reputation. However, we would suggest that any future similar strategic assurance body may well require a higher level of resourcing (or, given the underspend in some years) a greater freedom or willingness to spend available resources. This would enable them, particularly, to ensure that effective internal separation between the assurance and critical friend roles can be maintained, that sufficient resources can be invested in stakeholder management/ communications and that additional specialist expertise can be brought in when necessary.

For future models, consideration should also be given to having a smaller group of Commissioners, with which the secretariat could engage more easily. CSL is likely to have benefited from the Commissioners being given a stronger role, possibly including remuneration for their input.

Greater independence

Again, largely due to the skills of the Chair and staff, CSL managed on the whole to successfully combine constructive, trusted 'critical friend' relationships with the delivery bodies and effective assurance of their performance. However, giving CSL an even greater independence than they had may have improved external stakeholders' perceptions of their independence. As already noted, a minority of stakeholders, including one Commission stakeholder, felt that they were, at times, too 'cosy' in their relationships with the delivery bodies and some put this down to the organisational and funding relationships behind CSL.

It is not clear to us how independent sources of funding could have been secured for CSL, nor how they might be secured for future similar bodies. However, greater operational independence could have been achieved by housing them in an organisation which was not involved in the delivery of the Games and this may have provided additional benefits. At an operational level, the arrangement to house the staff and operational support within the GLA meant that, in addition to the process in place with funders to seek agreement on budgets and any variance from this, a parallel process was required to satisfy the legal and procurement hurdles of the GLA as a public procurement authority. This meant that CSL needed to engage in two processes to obtain permission to hire staff and to procure services. The GLA's internal processes were not designed to make decisions on behalf of an independent body.

CSL staff were in a larger staffing structure yet were also not part of the functioning of these structures. The CSL Manager reported technically to the Manager of SD in the GLA, but from a functional perspective the Chair set the strategic direction for the Commission and the Manager reported to the Chair on a daily basis. The benefit of being part of a larger structure was that the legal, finance and procurement functions of CSL were performed by the GLA, and staff had access to the pastoral care elements of the GLA's employment conditions. However, these functions could have been performed by another body, had the secretariat been housed within an independent organisation.

Future such models should ensure that the operational structures are established such that the assurance body is clearly seen to be independent from the delivery bodies and is not restricted by procedural requirements associated with the body in which they are housed. One option, of course, would be to house the organisation entirely independently but establishing an entirely independent structure and operation is only likely to be justifiable if the body is significantly larger and with a longer lifespan.

A lifespan for legacy

CSL have provided assurance of the plans for legacy. However, given the significance of legacy issues in the whole rationale for hosting the Games, we see a strong case for CSL to have been given a much longer life in order to provide assurance of the delivery of those Plans. This could have been in a scaled-down form focused just on the Legacy plans, funded by the LLDC, or could have been achieved through transferring staff to another organisation, which could then have provided assurance across major projects in London as a whole.

This issue is highlighted in CSL's legacy review which noted that the LLDC (formerly the Olympic Park Legacy Company – OLPC) was giving consideration to the issue, although we understand that since they are now part of the GLA, any decision to have an assurance body would now be done in discussion/agreement with the GLA, with the LLDC fitting into any wider plans rather than creating a dedicated body or function for them. CSL suggest that such a function may best form part of a body with wider assurance responsibilities:

The way in which the OPLC wishes to seek sustainability assurance of its work beyond March 2013 is one for the organisation to give thought to over the coming months. We have suggested that, if another assurance body is considered for establishment in London post March 2013, it would make sense for this to have a remit over major projects… (CSL 2012d; p30).

Notwithstanding the operational difficulties discussed above, the most likely route to providing assurance would be to integrate it within the functions of the GLA or London Assembly. However, consideration would be needed as to how transparency and independence could be achieved, particularly in relation to the LLDC, given that the LLDC is part of the GLA. Another critical question is how such a function could be funded. The most likely source would be the LLDC and any other major projects which were the subject of the assurance, although this is unlikely to be politically popular. The opportunities and barriers to future strategic assurance are discussed further in section 5.

Evaluation

Every two years, the delivery bodies scrutinised the budget and operation of CSL. CSL was not without significant scrutiny. However, one significant weakness of the assurance framework is that it outlined no mechanism for ongoing evaluation of the assurance body. Whilst this summative evaluation will help to ensure that the successes of CSL are celebrated and the lessons from its experience learnt, a mid-term independent evaluation or, ideally, a process for ongoing evaluation should have been conducted. As a minimum, some evaluation should have been carried out prior to the closure of the ODA. An ongoing process of evaluation would have been useful in helping to ensure that CSL evolved appropriately during its lifetime. This need not necessarily have required any more resources than those invested in this summative evaluation but a more formative process may well have provided a mechanism for identifying necessary and appropriate evolutionary changes in CSL's structure, size, operation and areas of expertise. We suggest that future such initiatives should have ongoing independent evaluation built in to their management structures and work programmes.

5. Wider lessons

5.1 Context - strategic assurance of sustainability

CSL was created *'to provide independent assurance and commentary to enable the sustainability objectives of the London 2012 programme to be achieved and to support a sustainable legacy'* (CSL, 2007).

This approach was unique to London 2012. No other Games or major sporting event has incorporated an independent strategic assurance body to scrutinise performance against its sustainability objectives.

Previous Games have had some form of critical oversight from a designated sustainability or environmental body. The 1994 Lillehammer Olympics, for example, featured Project Environment Friendly Olympics (PEFO), a mechanism funded by the Norwegian Government which brought NGOs under one banner to work with the Games organisers to create an environmentally-friendly Games (see for example Atkin, 1994).

In Sydney, Green Games Watch 2000 was an NGO environment watchdog, consisting of a coalition of NGOs (see Nature Conservation Council of New South Wales, 2000). Unlike PEFO, it operated independently from government and unlike CSL did not have any formal remit to scrutinise the Sydney 2000 Games.

In many ways, however, the lineage of the CSL is linked more closely with two UK-based sustainability advisory bodies: the UK Sustainable Development Commission (SDC) – now abolished - and the London Sustainable Development Commission (LSDC). Indeed, some of the delivery body stakeholders involved at CSL's formation stage reported that these bodies provided a template from which CSL was created. The working model for both the SDC[5] and the LSDC[6] was and is a group of experts with

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[5] The SDC's role in relation to the UK Government was threefold:
- an official watchdog function, scrutinising progress on implementing its sustainable development strategy;
- monitoring targets on the sustainable management of the Government estate and procurement; and
- providing policy advice; and helping to build capability across a range of departments (Sustainable Development Commission, 2011).

[6] The LSDC's remit is to *'advise the Mayor of London on ways to make London a sustainable, world-class city'*, doing this through:
- using its London Sustainable Development Framework to guide sustainability activity in London, and monitor progress;
- promoting the integration of sustainable development into all strategic decision-making in London;
- stimulating and encouraging research, programmes, or action plans to further the purpose of the Commission and the implementation of the London Framework for action; and
- providing an independent London voice on matters that relate to sustainable development, and take responsibility for advocating, encouraging, supporting and promoting best practice on sustainable development in all sectors (LSDC, 2006).

knowledge from across social, environmental and economic spheres – known as Commissioners – supported by a secretariat. The SDC was both an advisor and watchdog, while the LSDC is primarily an advisory body.

However, the model that evolved for CSL also employed ideas from the assurance industry. In particular, CSL took advice from PwC on global good practice to develop an assurance framework to guide its operations.

5.2 Defining strategic assurance

What is strategic assurance? … I would like to see 'independent assurance' defined.

[Delivery body stakeholder 11]

The term strategic assurance is not one commonly used in assurance circles. On the one hand, strategic sustainability scrutiny and advisory bodies, such as the SDC and the LSDC, are referred to using terms such as 'critical friends', 'watchdogs' and 'advisors'.

On the other hand, there is a vast sustainability assurance and certification industry encompassing standards-based third-party assurances processes, such as environmental management systems (e.g. ISO 14000), events management systems (e.g. ISO 20121) site or building audits (e.g. BREEAM), product certification (e.g. MSC, FSC, Soil Association, LEAF), internal and external financial audits and checks on annual sustainability reports. This is discussed further below.

As highlighted above, the CSL model blended the approaches of bodies like the SDC and the LSDC with concepts and tools from the assurance world. In many ways, therefore, CSL itself has helped to shape and define the term strategic assurance.

When defining its role in regard to strategic assurance, one secretariat member advised that CSL would generally refer back to its terms of reference and the Assurance Framework:

I'd say the aim and goals of the Commission indicate what we have sought to deliver as a Commission and the overview of the Assurance Framework … showing the scope, characteristics and principles of our assurance give some further granularity to it.

[Secretariat member 3]

In this respect, the goals of the Commission as a strategic sustainability assurance body were to provide:

- commentary to demonstrate whether the delivery bodies had:

    o robust plans and processes were in place to deliver sustainability;

    o objective evidence that sustainability objectives were being achieved;

    o plans and performance to support a sustainable legacy; and

- a credible reference point for stakeholders (see section 2 for more details on CSL's purpose and remit).

The strategic nature of their activities is emphasised in the Assurance Framework which required an initial focus on overarching strategy and governance and subsequently a clear framework for focusing attention on those areas with the most significant sustainability impact.

5.3 Relationship with traditional third party assurance

As described in section 5.2, there is a plethora of third-party assurance and certification systems and processes for sustainability. Many of these were used by the delivery bodies during the Games.

BREEAM, for example, was used to certify the sustainability performance of London 2012 Games venues. ISO 20121 was developed as a direct result of the Games and employed by LOCOG (see box below). Meanwhile, London 2012's Pre-Games Sustainability Report, *Delivering Change,* was issued with an 'A' grade by the Global Reporting Initiative (GRI) in April 2012. This included using a new events sector supplement to the GRI framework, the development of which was supported by LOCOG (CSL, 2012f).

Very broadly speaking, third party assurance and certification processes involve features such as a set of standards to be adhered to or aimed for, a process or system to be followed to get there, and self-reporting on progress, often backed up by some form of retrospective external audit.

ISO 20121

"ISO 20121 is a management system standard that has been designed to help organisations in the events industry improve the sustainability of their event related activities, products and services.

ISO 20121 is based on the earlier British Standard called 'BS 8901 Specification for a Sustainability Management System for Events' which was first developed in 2007. Due to the high level interest in BS 8901, it was decided to create an international version of the standard to coincide with the London 2012 Olympics.

In simple terms, ISO 20121 describes the building blocks of a management system that will help any event related organisation to:

- *Continue to be financially successful*

- *Become more socially responsible*

- *Reduce its environmental footprint*

ISO 20121 applies to all types and sizes of organisation involved in the events industry – from caterers, lighting and sound engineers, security companies, stage builders and venues to independent event organisers and corporate and public sector event teams.

Organisations that successfully implement the standard will be able to seek independent recognition of their achievement through a process called 'Certification'."

Source: ISO 20121, *Welcome to the ISO 20121 website,* [Online], Available at: http://www.iso20121.org/ [Accessed 5 February 2013]

5.4 The value of strategic assurance

In this evaluation, there was also broad support for the concept of strategic sustainability assurance amongst the stakeholders interviewed and surveyed.

Survey respondents, for instance, were asked 'Do you think that the use of an independent assurance body like [CSL] provides anything above and beyond traditional third party assurance of sustainability?' 14 respondents said yes, six said they didn't know and just two said no. There was a similar balance of support amongst those interviewed.

> *From the delivery bodies' perspective the engagement with CSL throughout the project represented a different challenge from conventional third-party auditing*

and verification work. It was a continuous process that required considerable work from the Sustainability team and regular involvement of senior management. This effort was worthwhile in that it helped ensure that sustainability continually remained high on the agenda and across all key departments (Stubbs, 2012, p7)*.*

It is worth emphasising that most stakeholders did not regard strategic assurance versus third-party assurance as an either-or choice. Indeed, there was general consensus across stakeholder types that the CSL model works well in tandem with third-party assurance processes such as ISO 20121.

> *Even with [ISO 20121] and the range of other tools and guidance now available, there is considerable merit in having an independent, authoritative structure to provide assurance over the sustainability programme.*
>
> *The new management system and reporting tools will help organisations and projects to address sustainability but in any high profile, big budget activity with public interest you need more evidence of 'walking the talk – independent assurance in some form is a valuable concept to plug the gap.*
>
> [Delivery body stakeholder 3]

We have already explored the specific added value brought by CSL but stakeholders also highlighted a number of benefits to strategic sustainability assurance more generally, including:

1. **Strategic oversight**. A strategic assurance body is able to look across the 'big picture' of a major event, project or policy process, taking a systems-based approach to bring different threads together to weave a coherent narrative of progress in meeting sustainability objectives. For example:

> *It should mean that assurance parties do have a greater understanding of an organisation and the overall goal of the project or organisation rather than a [standards-based] assurance body which is called in to look at a particular instance.*
>
> [Delivery body stakeholder 16]

> *It does add value and enable a better appreciation of the bigger picture and the integration of different aspects of sustainability.*
>
> [Delivery body stakeholder 6]

> *Yes, what they provided was above and beyond EMS [Environment Management Systems]. They provided a voice for sustainability to the rest of the world. CSL could look at things at a strategic level. An auditing system wouldn't necessarily pull the threads together. EMS is more of a bolt on.*
>
> [Delivery body stakeholder 7]

2. **Forward-looking.** Some stakeholders highlighted the strength of having an assurance body that has oversight of decisions made right at the outset of a major project or event such as the London 2012 Games. This form of assurance is not just about following processes but also about strategically determining future challenges and risks. It encourages delivery bodies to ensure that the most sustainable choices are made from the beginning, in contrast to traditional assurance audits which are retrospective in nature:

   Decisions made at the outset need to be sustainable so a strategic focus is important. EMS is retrospective, applied to whatever is set up, which may be more or less sustainable

   [Delivery body stakeholder 7]

   ISO is about reporting later. As assurance body is engaged now with the process

   [External stakeholder 36]

3. **Independence and credibility**. The issue of CSL's independence has already been discussed but it is generally recognised that an independent strategic assurance body, in contrast to a third-party process which might involve self-reporting with external audit and verification only occurring at the end, can enhance the credibility and robustness of the assurance process.

   A strategic assurance body is independent, not a 'tick box' exercise. With ISO you self-report through the process, with an inspection only at the end, so there's less independent criticism. ISO is about reporting later.

   [External stakeholder 36]

   Independent assurance produces a far more credible outcome to external stakeholders, including civil society and socially responsible investors

   [External stakeholder 22]

4. **Breadth**. Linked to this, stakeholders highlighted the wider scope that a strategic assurance body has compared to a process-based assurance standard. This breadth applies to strategic assurance's reach across the different elements involved in Olympic and Paralympic Games – it can look at the sustainability performance of whole systems, plans, organisations, processes, and so on – as well as the full range of issues – environmental, social and economic – that sustainability encompasses.

5. **Proactive rather than passive**. Many stakeholders valued the fact that CSL was able to be proactive, flexible and 'relevant' throughout the delivery process of the Games. This contrasts with some stakeholders' views that standards-based assurance is a more passive, 'tick-box' process.

A specific assurance body has visibility and can therefore receive concerns, which can inform its work; has commissioners with particular skills and personal commitment to the process; can build its work from one exercise to the next.

<div align="right">[External stakeholder 16]</div>

Flexibility was built into CSL's Assurance Framework:

… it is essential that the SD assurance framework is flexible and evolves to reflect the changing understanding of SD issues and their management over the course of planning, delivery and legacy of the Games (CSL 2007a, p3).

6. **Two-way dialogue**. Linked to the proactive nature of the strategic assurance model, stakeholders were also appreciative of the two-way dialogue that a strategic assurance body can facilitate with those responsible for delivering sustainability objectives:

    An organisation which is scrutinising has more of an on-going role, and also there was a vested interest for all to ensure that LOCOG did do best practice - since all parties wanted to see a games run with a good reputation. So it is positive that good practice proposals were made by CSL and then implemented - which is more of a two-way conversation.

    <div align="right">[External stakeholder 8]</div>

    A number of stakeholders highlighted that a more fluid, two-way approach can help deliver a more nuanced approach, assuring sustainability in ways that a 'tick-box' approach cannot:

    Third party certification is a very black and white process. Yet sustainability isn't black or white. CSL is more about having a conversation, and adds value in ways that third party certification can't.

    <div align="right">[External stakeholder 14]</div>

7. **Transparency**. Another common stakeholder view was that an independent strategic assurance body provides transparency about what delivery bodies are doing to achieve sustainability objectives. This not only provides reassurance to external stakeholders (see above) but also helps to focus minds internally on the commitments made.

    There is no doubt that the parallel commentary CSL provided increased the transparency of the progress being made on sustainability and kept minds focused on the core commitments in a way that an internal assurance process may not have.

    <div align="right">[External stakeholder 26]</div>

5.5 The risks of strategic assurance

Whilst there was a clear consensus amongst stakeholders that strategic assurance, as demonstrated by CSL, can offer value above and beyond traditional third-party assurance processes, there were a minority who were less convinced:

> *It could be argued that there are creditable third party assurers out there whose authority would be equal or even greater to that of a bespoke organisation.*

> [External stakeholder 24]

Stakeholders identified a number of specific drawbacks or risks to a strategic assurance approach. Note that these drawbacks or risks reflect stakeholders' answers to questions about strategic assurance in the round, rather than about CSL directly, and so should be treated as generic comments about the concept of strategic assurance rather than about CSL itself.

Key stakeholder concerns included:

1. **The risk of corporate capture.** A number of stakeholders, particularly external stakeholders, were concerned that a strategic assurance body can run the risk of partial 'capture' by those it is assuring, because they can become too close to them, there can be conflicts of interests or because the information provided to the assurer by those it is overseeing may only be partial[7].

   > *There is the potential for partial 'capture' of the assurer by the assured.*

   > [External stakeholder 26]

   > *Relying solely on information provided by delivery bodies may not present the whole picture.*

   > [External stakeholder 10]

   > *Sometimes there is accusation of bias – i.e. you are too close to them.*

   > [Delivery body stakeholder 10]

2. **Lack of prescription**. One delivery body stakeholder expressed concerns that a strategic assurance approach lacks prescription compared to a process-based, third-party assurance approach. The latter typically involves a systematic process for assessing whether standards have been achieved, based on common principles and standards agreed by the industry concerned.

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[7] It should be noted that stakeholders did not put forward any evidence that this had happened in the case of CSL but rather that this is a generic risk for any strategic assurance body.

A strategic assurance approach, on the other hand, is more fluid by necessity: it is an emerging concept open to interpretation and there is not currently a set of commonly-agreed guidelines and systems, as would be the case with third-party assurance; and it is also a forward-looking, systems-wide approach that arguably requires some degree of pragmatism and flexibility in the way it is delivered.

The concern of this stakeholder therefore seemed to be that a lack of prescription about how strategic assurance models should operate could mean that the findings and recommendations of a strategic assurance body could lack the rigour and weight of a third-party operations-based assurance system.

It is worth noting, however, that the principles for sustainability assurance are developing. ISAE 3000, for example, now provides a principles-based standard for non-financial assurance engagements. Furthermore, CSL 2012 itself now provides a model for future sustainability assurance bodies.

3. **Costs**. One stakeholder questioned whether the cost of delivering strategic assurance could be a potential downside, particularly in the current economic climate of austerity. The cost were seen both in terms of the actual costs of any body but also in terms of the opportunity cost to those being assured as a result of the time and resources needed to respond to and engage with the assurance body.

   In the case of CSL, as noted in section 3.2, it is difficult to determine its full financial value and cost of CSL without a proper cost-benefit analysis. It is certainly true that any assurance approach will involve some costs, although as section 3.2 highlighted, a strategic assurance approach can also result in financial savings.

4. **Barrier to delivery**. Linked to the above, one survey respondent also highlighted that a fully effective strategic assurance body could hold up delivery of a project.

   If the assurance body itself does fulfil its function effectively it can be an impediment rather than assistance to the delivery of a project.

   [External stakeholder 25]

   In the case of London 2012, CSL emphasised that the principles of pragmatism and 'no surprises' – where findings and recommendations were shared and discussed with delivery bodies before publication - were employed from the outset to deal with this.

5. **Duplication**. Another external stakeholder highlighted a potential risk that strategic assurance could end up duplicating work already being under third-party assurances processes.

   Whilst this could be a risk, another stakeholder also thought that strategic assurance was compatible with third-party assurance processes:

> *There is no need to duplicate the assurance schemes already in existence. CSL could set the framework and then work in partnership with the existing schemes to assure the detail of delivery.*

<div align="right">[External stakeholder 19]</div>

It is worth noting that CSL reported that it did seek whenever possible to dovetail its work with certification bodies. This included liaising with SGS over the BS8901 certification process for LOCOG, as well as assuring and then utilising the internal assurance process for the ODA's programme office.

5.6 A future for strategic assurance?

This section reflects on the findings to consider whether the strategic sustainability assurance model has a future. How replicable is the model in other settings? And what lessons can we draw from the CSL model to inform future bodies? We consider how replicable the model might be, by considering three potential applications for the model:

- for future Olympic and Paralympic Games and other major sporting events;

- for major infrastructure and regeneration projects; and

- for government decision-making processes.

Before doing so, we also highlighted three key limitations to replicating the CSL model identified by stakeholders.

Limitations to replicating the CSL 2012 model

Despite the support for strategic sustainability assurance as a concept, a number of stakeholders also expressed reservations about how replicable the strategic sustainability assurance model demonstrated by CSL 2012 is.

Unique to the Games

A sizeable minority of stakeholders felt that the strategic assurance model is only appropriate for the Olympic and Paralympic Games themselves, because of their sheer size and scope compared to other major sporting events or infrastructure projects. For example:

The value of CSL was important because the Games was more enormous than people realise. For other projects, because they will be building infrastructure <u>or</u> putting an event on, rather than the two together, then maybe ISO 20121 might be enough for other events.

[Delivery body stakeholder 7]

Cultural specificity

There was also a belief amongst a large minority of stakeholders that a strategic assurance body worked for London 2012 because of the cultural acceptance of the need for independent sustainability assurance, reflected at the time by the existence of bodies like the SDC. As a result, there was concern that such a model might not work in different political and cultural contexts:

Whether the same model would work in Sochi or Rio is very hard to say. Every Games is unique as is every culture … the question is whether other countries have the supporting structures in place that are strong enough to allow it to work as well.

[Delivery body stakeholder 6]

I don't know if it's in the minds of anybody that they really know how to handle that because there isn't backdrop of engagement processes of that kind like we have here in the UK … The Commission was to some degree politically and culturally unique to the London Games.

[External stakeholder 18]

Lack of political will

Regardless of the pros and cons of strategic assurance, one stakeholder expressed the belief that political support for the concept of strategic sustainability assurance did not exist in the UK and so was unlikely to be supported:

There doesn't appear to be the political will. It's not just about events, it could be about any major project. But no one wants to do it, probably because they are afraid to do it, to give such a small body such independence.

[Commission stakeholder 8]

Notably, while there may be less of an appetite for strategic sustainability assurance within the public sector, there is some evidence of this type of approach beginning to be used in the private sector. During this evaluation, for example, we came across an example of a multinational company with a long-term sustainability policy who have commissioned a third-party organisation to understand whether it is likely to achieve its objectives.

Olympic and Paralympic Games and other major sporting events

The strategic sustainability assurance model has now been tested and proven to work in London 2012 so this is the most direct opportunity for replication.

Indeed, the majority of stakeholders who answered questions about the future of strategic assurance believed that the CSL model should be replicated in future Olympic and Paralympic Games and other big sporting events:

> *I felt CSL 2012 added greatly to the credibility of London 2012 and should be a model for future Olympics and other mega sporting events, like the Commonwealth Games, FIFA World Cup and Rugby World Cup.*

> [External stakeholder 22]

There were concerns that CSL was perhaps culturally and politically unique to London 2012 and wouldn't work in other countries and settings (see above). Whilst this may be true, however, there is arguably a role for the IOC to play in promoting the CSL model to help to 'normalise' the concept for future bidders and future Games.

At the very least, the IOC could play a role in championing the CSL model and hold it up as good practice to encourage future Games to replicate it. It could go further however. One stakeholder suggested, for example that it could encourage the model through bidding requirements:

> *For the Olympics, it would have to be committed to as part of the bid, so the IOC should make it a requirement in their bidding framework.*

> [External stakeholder 36]

Another, bolder, suggestion, was that the IOC could form a permanent secretariat that would support a strategic assurance process for each Games:

> *I'd like to see the IOC creating a permanent secretariat to support host cities.*

> [External stakeholder 3]

Major infrastructure and regeneration projects

This evaluation has found that the majority of stakeholders think that the strategic assurance of London 2012 as a major infrastructure project was a success. This suggests that replicating the CSL 2012 model to oversee the commissioning and delivery of to major infrastructure and regeneration projects in the future could also have significant value.

Indeed, based on its own experience, CSL made the case that strategic sustainability assurance should have a future beyond London 2012, particularly in relation to major projects:

From our own perspective, we believe that the very act of creating an independent assurance body to oversee the Games programme continues to be world-leading. This Commission appropriately ends on 31st March 2013 but its own legacy is worth further consideration. We have recommended that the Greater London Authority consider the value of strategic assurance for major projects in London going forward.

[CSL, 2012d; p3]

In its own survey of stakeholders, CSL found general support for the idea:

Stakeholders who responded have generally expressed support for this question to be explored further (this includes all the 2012 Key Stakeholders). It would therefore be appropriate in this context for the GLA to explore the concept of strategic sustainability assurance further, preferably with other, wider stakeholders beyond the 2012 Programme which are responsible for commissioning and/or delivery of major projects.

[CSL, 2012d; p51]

In this evaluation, a number of stakeholders could also foresee opportunities for strategic assurance in the context of major infrastructure projects or regeneration projects. However, a similar number of stakeholders were more sceptical about the idea.

The view expressed by a handful of the sceptical stakeholders was that such projects are already subject to sustainability appraisals, environmental impact assessments (EIA) and other forms of regulation and assurance, and so they were not convinced a strategic assurance approach was a necessary addition to these existing processes. For example:

To set up an equivalent body for managing high-speed rail just doesn't really work for me. I mean, not least because if you look at the requirements for such projects, scrutiny will already happen on bits of the sustainability impact story. That's all stuff that's going to have to be done anyway.

[External stakeholder 18]

Sustainability appraisals and EIAs are undoubtedly important parts of the management of any large project. It is worth noting, however, that they are different to having independent strategic assurance as they don't have the kind of on-going, forward-looking evaluation and reporting that comes from the assurance the CSL model provided.

Furthermore, the more sceptical views were generally expressed in relation to the use of *individual* strategic assurance approaches for single infrastructure projects. There was very little reflection from stakeholders on the feasibility and appropriateness, in

principle, of a single strategic assurance body to oversee key the commissioning and delivery of multiple infrastructure projects at some level.

Major infrastructure and regeneration projects can be complex and multi-dimensional, with opportunities and risks for the economic, social and environmental impacts on communities. Ensuring that the best sustainability outcomes are achieved is a challenging task and unsatisfactory compromises can be made at the commissioning and delivery stages as a result of financial, technical, political and other constraints, even when the commissioning and delivery bodies have the best intentions.

Given CSL's success during London 2012, this raises the question of whether the CSL model could add value to this type of high profile, complex, multi-stakeholder project. The legacy work in Queen Elizabeth Olympic Park is an obvious current example and the regeneration of the Greenwich Peninsula a previous example of where the model may have had relevance.

Indeed, CSL has recommended that a sustainability assurance body should oversee the Olympic legacy work and said that the Olympic Park Legacy Corporation (now called the London Legacy Development Corporation) was actively considering this idea. We noted in the previous chapter of this report the importance of securing an effective assurance function for the legacy of the Games.

Government decision-making processes

Variations of the CSL model – albeit without any formal assurance functions - have already been applied at different levels of government in the UK. This report has already mentioned the now-defunct SDC as well the LSDC. Critical friend bodies for sustainability previously existed at the regional level in England before this tier of governance was removed by the current UK Government. In Wales, a Commissioner for Sustainable Futures has replaced some of the function that the SDC played there.

Whilst the number of independent sustainability bodies has declined in recent years, the CSL model raises the question of whether its particular blend of assurance of critical friend approach could be replicated to provide independent sustainability assurance over key infrastructure and regeneration decisions made by governments at the national and regional levels.

Governments in the UK do, to some degree, internally assess the sustainability impacts of key decisions, there is no independent strategic assurance process for these. Yet external strategic assurance of sustainability was deemed to have been of real value to London 2012. Given this, governments in the UK should reflect on the learning and successes from CSL's work and consider whether the model could be applied or adapted to help assure that the most sustainable outcomes are achieved in key decision-making processes.

In London, any independent strategic assurance body or process would need to ensure that it complimented the existing governance framework, taking into account the scrutiny and critical friend roles already played in respect to sustainability by the GLA, the London Assembly, the London boroughs and other key bodies in the capital.

6. Conclusions

6.1 Added value

London made a commitment to the International Olympic Committee (IOC) and the public to deliver the most 'sustainable Games ever'. CSL have played a significant role, along with many others, in enabling this to be achieved.

The precise level of additionality brought by CSL is impossible to define retrospectively, particularly since there is no counterfactual against which we can compare the programme. However, the consensus amongst delivery body and other stakeholders contacted as part of this evaluation was that CSL added significant value to the London 2012 programme. This added value has a number of different dimensions:

1. **Sustainability outcomes.** Through helping to embed sustainability within the governance and strategy for the programme, providing leverage to those within the delivery bodies who were seeking to deliver sustainability and through their advice and assurance activities, the evidence suggests that CSL had a significant impact on the sustainability of London 2012.

2. **Finance.** Particularly in the context of the overall London 2012 budget, the direct costs of CSL were small. CSL appear to have punched well above their weight and a large number of stakeholders feel that CSL represented excellent value for money. Whilst it is clear that engaging with CSL and following through on some of their recommendations led to expenses being incurred by the delivery bodies, whether these are considered to be additional costs or necessary costs depends, of course, on your view of the importance of the issues. Furthermore, the evidence highlights a number of areas in which CSL may have generated significant cost savings for the delivery bodies.

3. **Governance.** The secretariat highlighted a number of instances in which their programme-wide overview of London 2012 enabled them to identify issues that were at risk of falling between multiple organisations and not being effectively addressed. CSL also aided delivery by helping to broker solutions, particularly in relation to issues of importance to NGOs. By helping to manage the expectations and inputs of external stakeholders, CSL also enabled the delivery bodies to focus on delivery.

4. **Knowledge promotion.** CSL have played a significant role in ensuring that the learning gained from London 2012 is recorded and shared, particularly through ensuring that the ODA and LOCOG's learning was captured. CSLs publications are also a unique body of work and therefore also an important part of the learning legacy of London 2012.

5. **Managing the expectations of external stakeholders.** CSL, and particularly CSL's Chair, developed trusted relationships with a wide range of external stakeholders. They were able to act as a buffer or broker between the external stakeholders (particularly the NGOs) and the delivery bodies and this role has been highly valued by the delivery bodies. The value added by CSL in terms of stakeholder relations was significantly heightened by their positive and open approach to communications, which appears to have been in contrast to some of the delivery bodies.

6. **Credibility and reputation of the London 2012 programme.** There is a broad consensus that CSL added very significant value to the credibility and reputation of the London 2012 programme. The fact that CSL gave the programme greater credibility from a sustainability perspective is seen by many to have been a key contributor to the absence, in the main, of negative coverage of the Games from a sustainability perspective.

6.2 Delivery

CSL's recommendations appear to have been listened to and acted upon by the delivery bodies. The evidence points to a number of key reasons behind this apparent effectiveness:

1. **Reporting line.** The ability for CSL to take issues to the highest level (i.e. the Olympic Board) when necessary, which was built in to the assurance framework and terms of reference, appears to have been critical to their successes.

2. **The 'critical friend' role.** Through achieving and maintaining the trust of the delivery bodies, CSL have managed to combine a critical friend role with their more formal strategic assurance role. In fact, their ability to provide credible, constructive advice appears to have directly contributed to their formal assurance recommendations being listened to. The 'no surprises' principle appears to have been critical in trust being engendered with the delivery bodies and to providing the space in which solutions were able to be found.

3. **Maintaining a strategic approach.** Given the relatively limited resources available to CSL and the pressures upon them from a wide group of interested stakeholders, maintaining a strategic approach was critical in terms of (a) not spreading their resources too thinly, and (b) maintaining the trust of the delivery bodies. CSL's careful and considered approach to filtering issues has been an important aspect of their effectiveness.

However, some stakeholders perceived some aspects of CSL to have worked less well:

1. **The role of the Commissioners.** The Commissioners' role was highly valued by the secretariat and, generally speaking, the Commissioners were positive about their role, but the evidence suggests that they may have been too peripheral to the work of CSL at times. Particularly in the context of having a small secretariat, it may have been beneficial to have been able to make more extensive use of the Commissioners.

2. **Boldness and independence.** Striking the balance between idealism and pragmatism was clearly a constant challenge for CSL. The general view amongst the delivery body stakeholders is that they got the balance right most of the time. However, CSL have suggested that they could have been bolder on occasion and a number of external stakeholders also feel that they were too cautious at times. Some stakeholders linked this to questions over the level of independence which CSL had.

3. **Gearing up for the Games.** LOCOG suggested that, whilst CSL worked well during the construction phase of London 2012, the structure, processes and resourcing were inappropriate for the event management phase. This is a view echoed by some external stakeholders. CSL definitely did gear up for the games and adopted a very different approach during Games time and although CSL themselves acknowledge being significantly stretched in terms of resources during this period, we have no evidence to suggest that this affected the outcome of their assurance work.

4. **Stakeholders.** CSL carried out extensive work with external stakeholders and this role was widely lauded. However, CSL felt that they could have done more to engage with social and economic stakeholders and others made wider points about the benefits which could have been gained by investing more resources in communications and engagement.

5. **Dealing with legacy.** The important post-Games role of CSL was clearly envisaged at the outset, with the Terms of Reference envisaging a role for CSL *'to ensure that wider legacy benefits continue to be assured post Games'* (CSL, 2007). Although CSL carried out a review of legacy in 2012, it is unclear who will provide assurance of legacy in the absence of CSL.

This report explores a number of aspects of CSL which might have been improved or which may need to be considered for future similar bodies:

1. **Appropriate resourcing.** CSL certainly appear to have punched above their weight, relative to the their incurred costs. However, we would suggest that any future similar strategic assurance body may well require a higher level of resourcing (or, given CSL's underspend in some years) a greater freedom or willingness to spend available resources. This would enable them, particularly, to ensure that effective internal separation between the assurance and critical friend roles can be maintained, that sufficient resources can be invested in stakeholder management/ communications and that additional specialist expertise can be brought in when

necessary. For future models, consideration should also be given to having a smaller group of Commissioners, with which the secretariat could engage more easily.

2. **Greater independence.** It is not clear to us how independent sources of funding could have been secured for CSL, nor how they might be secured for future similar bodies. However, greater operational independence could have been achieved by housing them in an organisation which was not involved in the delivery of the Games and this should be considered for future similar bodies.

3. **A lifespan for legacy**. CSL have provided assurance of the plans for legacy. However, given the significance of legacy issues in the whole rationale for hosting the Games, we see a strong case for CSL to have been given a much longer life in order to provide assurance of the delivery of those Plans. This could have been in a scaled-down form focused just on the Legacy plans, funded by the LLDC, or could have been achieved through transferring staff to another organisation (most likely the GLA), which could then have provided assurance across major projects in London as a whole.

4. **Evaluation.** A mid-term independent evaluation or, ideally, a process for ongoing evaluation, would have been useful in helping to ensure that CSL evolved appropriately during its lifetime. It may well have provided a mechanism for identifying necessary and appropriate evolutionary changes in CSL's structure, size, operation and areas of expertise. We suggest that future such initiatives should have ongoing independent evaluation built in to their management structures and work programmes.

6.3 Wider lessons

The value of independent strategic assurance of sustainability

Stakeholders of all types expressed broad support for the concept of strategic sustainability assurance. The benefits of such an approach were:

1. **Strategic oversight.** A strategic assurance body is able to look across the 'big picture' of a major event, project or policy process, taking a systems-based approach to bring different threads together to weave a coherent narrative of progress in meeting sustainability objectives.

2. **Forward looking.** A strategic assurance body has oversight of decisions made right at the outset of a major project or event. It encourages delivery bodies to ensure that the most sustainable choices are made from the beginning, in contrast to traditional assurance audits which are retrospective in nature.

3. **Independence and credibility**. An independent strategic assurance body can enhance the credibility and robustness of the assurance process.

4. **Breadth**. A strategic assurance body has wider scope compared to a process-based assurance standard, in terms of its reach across different elements involved in an Olympic and Parlaympic Games – it can look at the sustainability performance of whole systems, plans, organisations, processes, and so on – as well as the full range of issues – environmental, social and economic – that sustainability encompasses.

5. **Proactive**. A strategic assurance body can be proactive, flexible and 'relevant' throughout the delivery process. This contrasts with some stakeholders' views that standards-based assurance is a more passive, 'tick-box' process.

6. **Two-way dialogue**. A strategic assurance body can facilitate an ongoing two-way constructive dialogue with those responsible for delivering sustainability objectives.

7. **Transparency**. An independent strategic assurance body provides transparency about what delivery bodies are doing to achieve sustainability objectives. This not only provides reassurance to external stakeholders but also helps to focus minds internally on the commitments made.

Despite broad support for the model of strategic assurance demonstrated by the CSL, stakeholders did identify a number of potential drawbacks or risks to this approach.

1. **The risk of corporate capture**. A strategic assurance body can run the risk of partial 'capture' by those it is assuring. There is a risk they can become too close to those they are assuring, there can be conflicts of interest and the information provided to the assurer by those it is overseeing may only be partial.

2. **A lack of prescription.** A lack of commonly-agreed prescribed standards and principles for undertaking a strategic sustainability assurance approach (compared to third-party assurance and certification) could mean that the findings and recommendations of a strategic assurance body could lack the rigour, consistency and weight of a third-party operations-based assurance system. The principles for sustainability assurance are developing, however, and CSL 2012 itself now provides a template for future sustainability assurance bodies.

3. **Costs.** The costs of a strategic assurance could be a potential downside, both in terms of the actual costs of the body but also in terms of the opportunity cost to those being assured as a result of the time and resources needed to respond to the assurance body. Any assurance approach will involve some costs, however a strategic assurance approach can also result in financial savings.

4. **A barrier to delivery.** A strategic assurance body could hold up the delivery of a project. In the case of London 2012, CSL employed the principles of pragmatism and 'no surprises' to deal with this risk.

Replicability

There was general support across all types of stakeholders for the concept of strategic sustainability assurance for major events and projects in the future but there were also a number of reservations about how replicable the model is:

1. **Unique to the Games**. A sizeable minority of stakeholders felt that the strategic assurance model is only appropriate for the Olympic and Paralympic Games itself, because of its sheer size and scope compared to other major sporting events or infrastructure projects.

2. **Cultural specificity.** There was also a belief amongst a large minority of stakeholders that a strategic assurance body worked for London 2012 because of the cultural acceptance of the need for independent sustainability assurance, reflected at the time by the existence of bodies like the SDC. As a result, there was concern that such a model might not work in different political and cultural contexts.

3. **Lack of political will.** One stakeholder expressed the belief that political support for the concept of strategic sustainability assurance did not exist in the UK and so was unlikely to be supported. There is some evidence of this type of approach beginning to be used in the private sector, however, even if support for the approach in the public sector may be less strong.

These limitations notwithstanding, there are several potential applications for the model:

• for future Olympic and Paralympic Games and other major sporting events;

• for large infrastructure or regeneration projects; and

• for government decision-making processes.

Stakeholders expressed strong support for the CSL model to be replicated in future Olympic and Paralympic Games. It has already been tested and proven to work in London 2012 so this is the most direct opportunity for replication. The IOC should consider how it can promote the CSL model to help to 'normalise' the concept for future bidders and future Games.

The success of CSL in providing strategic assurance to the infrastructure elements of London 2012 suggests that replicating the model to oversee the commissioning and delivery of to major infrastructure and regeneration projects in the future could have

significant value. Whilst a significant number of stakeholders were sceptical about the individual application of the CSL model to one-off infrastructure projects, the CSL model could add value to the commission and delivery of high profile, complex, multi-stakeholder projects, including the legacy work in Queen Elizabeth Olympic Park.

Finally, the CSL model raises the question of whether its particular blend of assurance and critical friend approach could be replicated to provide independent sustainability assurance over key infrastructure and regeneration decisions made by governments at the national and regional levels.

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Appendix A: Interviewees and survey respondents

Interviewees

39 interviews were conducted. The interviewees are listed below.

- 3 members of the current secretariat and the former manager

- CSL's Chair and 7 commissioners/co-opted experts

- 12 representatives of the delivery bodies (ODA, LOCOG, GOE, GLA and LLDC)

- A representative from the Host Borough Unit

- A representative of the IOC

- A representative from DEFRA

- 2 representatives of media organisations

- 11 representatives of other external agencies, including:

    o Best Foot Forward

    o Bhopal Medical Appeal

    o Bioregional

    o Friends of the Earth

    o Forum for the Future

    o Greenpeace

    o Natural England

    o TUC

    o WWF

Survey respondents

34 survey responses were received from the following organisations:

- GLA

- 2 representatives of the LLDC

- Beyond Green Ltd.

- BT

- CIEH

- CIRIA
- Defra
- Earth Champions Foundation
- Ecotricity Group Limited
- Environment Agency
- Fairtrade Foundation
- Formerly RICS
- Greener Upon Thames
- House of Lords Sport @ the 2012 Olympics
- IHRB
- LB Newham
- LB Waltham Forest
- LB Newham
- Lewisham Pensioners' Forum
- London & Partners
- 2 representatives of the London Wildlife Trust
- London Sustainability Exchange (LSX)
- National Audit Office
- Sport England
- SPS Consultancy Services Ltd
- Sustain: The alliance for better food and farming
- Traidcraft
- TUC
- UK Athletics
- unionlearn SERTUC
- WRAP