



Office for
Nuclear Regulation

Stakeholder Engagement Strategy 2020-25



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Introduction to our Stakeholder Engagement Strategy 2020-25

I am pleased to introduce this stakeholder engagement strategy, which sets out our objectives and intentions to inspire confidence across the diverse range of groups we engage with. By learning from others, working openly and transparently and communicating in accessible ways, we aim to deliver the intent set out in our Strategy 2020-25. Our success depends on the continued support and commitment from our stakeholders and greater two-way engagement.

The focus of our 2020 stakeholder engagement strategy was on building trust and more positive perceptions of ONR, as well as improving transparency. External assurance confirms our performance has been strong with a mature stakeholder engagement approach. Our most recent survey demonstrated that we continue to be viewed as professional, independent and trusted. Other feedback from Non-Government Organisations (NGOs), our dutyholders, government and international peers, demonstrates confidence in our ability to inform regulatory practices, standards and policy too.

We aren't complacent though, and stakeholder confidence remains at the core of our 2025 ambitions. This strategy will enable us to build on these firm foundations to improve our services and levels of engagement. We want to go from 'good' to 'great', by:

- Fully establishing our reputation as a credible voice that is recognised consistently as a global influencer of regulatory standards and practices and a trusted advisor across key policy areas;

- Expanding our reach by being more outward looking, extending our networks to enhance understanding of our work with interested parties to protect society; and
- Being even more transparent and accessible to our stakeholders and the practices, processes and systems across our organisation to enable greater two-way engagement.

As an organisation wide business strategy for stakeholder engagement, this document sets the direction and deliverables that will be implemented through directorate and divisional plans and operations to achieve the ambitions of ONR's Strategy 2020-25. It is a living document and will evolve as we take account of our changing operating environment, including our response to COVID-19 (coronavirus).



Katie Day
Director of Policy and Communications

Our Strategic Direction

Our Strategy 2020-25 sets out our mission, vision, strategic themes and new organisational values. They provide the context in which we have developed this document.

Our new mission focuses on protecting society, and our vision looks to a modern ONR that delivers value and trusted outcomes, which continue to inspire stakeholder confidence. That means a steely focus on exemplary regulation, with clear intent to modernise and improve how we work, to give the best possible service and value.

This means taking action where stakeholder feedback indicates we need to do better, including:

- Demonstrating **regulatory proportionality, consistency and efficiency**;
- Using our enabling regulation approach and appetite for innovation to realise the benefits of new technologies and approaches;
- Being clearer about the cost of our regulatory decisions; and
- Extending our stakeholder reach, including greater engagement on our plans, priorities and regulatory decisions.

2020 Communications Strategy Achievements

Our intention from 2017 to 2020 was to promote ONR as a world-class regulator, and explain our remit while protecting and upholding our reputation. With the formation of our Policy and Communications Directorate, we brought together our external relations functions to provide the leadership, consistency and operational expertise to drive improvements in how we work. With Senior Leadership Team (SLT) and Board advocacy, good quality communications and engagement have become integral to ONR, furthering our reputation for openness, in order to build trust and stimulate public confidence.

Below is a high-level summary of outcomes we have achieved since 2017:

Understanding and engaging our stakeholders

- Became fully compliant with the Regulators' Code requirement to ensure clear information, guidance and advice is available to those we regulate, including publication of our Enabling Regulation Guide;
- Strengthened relationships with UK government, supported by annual planning assumptions, effectively informing UK policy and horizon scanning;
- Published a Strategic Framework for International Engagement, clarifying our intent and activities to enhance our world-class regulator reputation, learn from others and share our expertise;
- Drove greater openness through regular publication of information about our regulatory decisions and performance, high quality, timely replies to public enquiries (95% within deadline), and the introduction of our Chief Nuclear Inspector's annual report; and
- Enhanced levels of two-way engagement with interested parties, including NGOs, site stakeholder groups and local liaison committees, markedly shifting confidence in ONR amongst those stakeholders.

Data intelligence, stakeholder research and insight

- Put in place effective mechanisms to gather feedback from our stakeholders, including annual surveys, intelligence from inspectors, and through annual reviews of safety to inform our Organisational Effectiveness Indicators.

Media, reputational management and public relations using digital and social media

- Grown our digital presence with engaging social media content driving a four-fold increase in followers, and establishing a new webinar programme to be more accessible to wider audiences;
- Enhanced our media liaison by positioning our skilled press officers as the interface and enabling our SLT to act as key spokespeople; and;
- Driven more consistent external communications through alignment across our digital channels, and internally with our staff – so our stakeholders hear the same message, whichever route it comes from.

Brand and identity

- Established a clear ONR visual identity that centres on our staff and promotes our work consistently across our publications, documents and buildings; and
- Refreshed our brand to signal the start of our Strategy 2020-25, and ensured our publications and content are visually consistent and easily recognised.

Nuclear Horizon

Our Strategy 2020-25 sets out the factors that have influenced our direction and intent as an organisation. Our horizon scanning, informed by stakeholder engagement, remains essential so that we can plan, prioritise and respond to the changing world around us.

We recognise there are, and will be, specific aspects of the regulatory framework where we need to inform policy thinking and implementation, both at home and abroad. We've set those out below:

Cross cutting and International

- Nuclear industry recovery from COVID-19, including economic case
- Climate change and net zero
- Nuclear Sector Deal
- Better Regulation arrangements, including Growth Duty measurement and reporting; and enabling innovation
- Regulatory standards and practices
- Regulatory collaboration through legal and administrative arrangements and boundaries, to reduce regulatory burden
- Public disclosure
- Charging arrangements and fees regulations

Decommissioning

- Nuclear Decommissioning Authority (NDA) funding arrangements and strategy to continue priority hazard and risk reduction activities
- UK Decommissioning strategy, including working with the Western European Nuclear Regulators Association (WENRA) and the International Atomic Energy Agency (IAEA) in defining and shaping good practice across costs and impact to inform the UK position
- Geological Disposal Facility – siting and regulatory framework

New Reactors

- Generic Design Assessment
- Funding models, including Regulated Asset Base
- Regulation of Advanced Nuclear Technologies
- Regulation of fusion

Operating Facilities

- End of life policy framework and arrangements to access the Nuclear Liabilities Fund
- Defence funding and spending priorities to continue priority hazard and risk reduction activities

Security

- Full roll out of security assessment principles (SyAPs), including revision to underpinning legislation

Safeguards

- Developing our full capability by December 2020 and delivering a new regulatory function
- Safeguards Fees regulations

Our 2025 Journey

This business strategy outlines our priorities to inspire stakeholder confidence. It will be delivered through activities agreed within our annual corporate plan and supporting directorate business plans.

Below, in summary, are the key activities and outcomes that we can expect to see year on year to 2025. These are in addition to our established programme of proactive publication and engagement:

By 2020 21, we will:

- a) Ensure our stakeholders are informed and benefiting from effective two-way communications in relation to our COVID-19 (coronavirus) response, evidenced by regular feedback and surveys.
- b) Set out our strategic intent by publishing and engaging on our Strategy 2020-25 and our 'Approach to regulating innovation', supported by a refreshed ONR identity and consistent strategic narrative.
- c) Make our international engagements more targeted, strategic, and fully aligned to our Strategic Framework for International Engagement.
- d) Explain our ambitions to be an exemplar of openness and transparency, outlining the direction and deliverables to achieve them within the next four years.
- e) Clarify our engagement strategy with academic institutions and professional bodies.

By 2021 22, we will:

- a) Begin to develop a clearer framework for our strategic domestic engagement, including how we will contribute to government's climate change and net zero policies, as well as better learn from those we engage with, such as other regulators, to improve our effectiveness.
- b) Be engaging more across industry and through the supply chain to further promulgate our approaches to enabling regulation and innovation.
- c) Be able to effectively report on the impact and outcomes of all our international engagements to show how we are delivering value and benefit to our stakeholders.
- d) Publish our framework for openness and transparency, which will have taken account of stakeholder feedback and ideas to shape how we work in the future.
- e) Be supporting the Safety Directors Forum to implement good practice for effective site stakeholder groups and local liaison committees, to widen public engagement.

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By 2022 23, we will:

- a) Be participating, at the most senior levels, in networks and engagements (beyond our sector and borders) to consider matters of common interest such as government policy, regulatory co-operation, cost-effectiveness, and horizon scanning.
- b) Be more transparent with dutyholders on the economic cost of our regulation, and be engaging more effectively on charging.
- c) Introduce effective communication skills for all staff, as a core element of our ONR Academy programme and continuous professional development, in support of greater openness and transparency.
- d) Engage on proposals for appropriate community/public consultation on regulatory decisions, aligned to International Atomic Energy Agency (IAEA) best practice.
- e) Be working with dutyholders to enable greater openness and transparency across the industry through effective public information and disclosure programmes.

By 2023 24, we will:

- a) Make publication of case studies on regulatory impact and good operational practice routine, including the impact of academia engagement.
- b) Be recognised through external accreditation for stakeholder service.
- c) Have in place a robust Academy programme so our staff are competent and confident to deliver consistent, plain English communications.
- d) Be systematically using stakeholder feedback to improve our effectiveness and impact organisation-wide, including realising the benefits from our Well Informed Regulatory Decisions (WIReD) project, so we can act on intelligence and insight across dutyholder interactions.
- e) Launch our new fit-for-purpose website to enhance accessibility.

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By 2024 25, we will:

- a) Be recognised through external accreditation for use of plain English and accessibility of our publications.
- b) Be receiving feedback from our stakeholders that we are more proportionate and consistent in our regulation.
- c) Have established our reputation through the industry and supply chain for being open to innovation, so they are engaging with us at the earliest opportunities.
- d) Be considered value for money consistently by government, our dutyholders and the public.
- e) Be viewed as an exemplar of openness and transparency, influencing national and international practice, and undertaking appropriate consultation on key regulatory decisions.

Strategic Themes

Our Strategy 2020-25 outlines the four strategic themes that will underpin how we will deliver our mission and achieve our vision over the next five years. This business strategy will support work across all four themes, although it is principally aligned to strategic theme two – inspiring stakeholder confidence.

Strategic Theme 1: Influencing proportionate improvements

Effective stakeholder engagement, especially with those we regulate, is an enabler to securing safe nuclear operations across Great Britain. We have an established programme of interactions with our dutyholders, based upon effective two-way engagement to ensure we maintain the high standards required by UK law, using our full range of enforcement powers if necessary.

Improve systematic inspection and intervention feedback and learning with duty holders to improve impact.

We already listen and act on feedback from the many sources we get, including surveys and the Regulatory Nuclear Interface Protocol (RNIP). We now intend to deploy organisation-wide structures and processes to bring greater consistency and better analysis in how we gather and use stakeholder feedback. Enhancing our use of audience insight and understanding will inform our regulatory interventions, as well as our stakeholder engagement priorities, messaging and activities.

Strategic Theme 2: Inspiring stakeholder confidence

(a) Collaborate with, and learn from, UK and international organisations and regulators to improve our work, the outcomes we influence and seek to ensure no unnecessary regulatory burden.

To do this we will:

- Work more collaboratively and strategically with other regulators, at home and abroad, joining up to reduce duplication, using our collective voice to inform regulatory policy driving improvements in the provision of information to the public, and providing peer review to help us get a more balanced measure of our effectiveness and impact.
- Expand our stakeholder reach by diversifying and widening our current networks beyond our traditional nuclear partners, looking to the wider energy and national infrastructure sectors, to build a greater understanding of our role and support our own horizon scanning, and enabling greater agility to respond to our changing operating environment.

- Continue to welcome and participate in peer review internationally, with future IAEA missions and international conventions, as well as responding to the Integrated Regulatory Review Service (IRRS) 2019 mission recommendations and findings to further enhance our performance.
- Align to the objectives of our Strategic Framework for International Engagement, secure key positions within international conventions and international organisations to further our global influence across regulatory standards and practices, and seek to positively influence the climate change agenda.

(b) Retain public trust by seeking to be an exemplar of transparency through activities such as local and national engagement, proactive publication of clear information and considering accessibility requirements from the outset.

To do this we will:

- Publish our first Openness and Transparency Framework, which will include early proposals and a timeline for how we intend to fully align to IAEA standards, by consulting appropriately on key regulatory decisions in the future.
- Encourage greater industry transparency by leveraging our influence within prominent groups such as the Safety Directors Forum and the Society for Radiological Protection, alongside our administrative powers for reporting, to establish more proportionate public disclosure programmes that will enable a better public understanding of radiological safety.
- Adopt good practice from other domestic and international regulators, establishing better two-way engagement and appropriate consultation in the formulation of guidance and standards and key regulatory decisions.
- Take a leading role in the Nuclear Energy Agency's work to improve communication around risk and build greater trust between regulators and the public they serve, using feedback from our stakeholders to ensure the work is fit for purpose and can be applied effectively to further public understanding and engagement.
- Undertake further engagement with dutyholders to inform and shape a review of our charging methodology and/or fees regulations.
- Be more proactive with structured and targeted messaging about the cost-effectiveness of our regulation, to facilitate greater understanding of how we create and add value. This will include demonstrating how we are becoming more efficient and driving better value for government, industry and the public, through our organisational change programmes (such as our IT modernisation and WIReD).
- Publish a stakeholder charter to enhance our customer focused approach to our interactions with the public, and seek to achieve external accreditation for our standards of correspondence with the public and accessibility of information.
- Continue to gather stakeholder feedback and insight from independent stakeholder surveys, enabling us to learn and improve, as well as adapt to evolving stakeholder needs.

(c) Engage industry bodies, supply chain and potential investors to promote consistent awareness and understanding of our enabling approach and regulatory innovation.

To do this we will:

- Demonstrate that we are an enabling regulator that is 'open for innovation', using our 'Approach to regulating innovation' publication to set out our appetite and expectations, and to enable the embracing of new ideas and technology, where it is safe to do so across the industry and supply chain.
- Be more outward-facing by extending our industry stakeholder reach and direct engagement with the supply chain (existing and potential, within and outside the sector), investors, industry clients, developers and others, to socialise our approach, in order to build understanding, manage risks and encourage feedback. This will also benefit our horizon scanning, improving our awareness of future regulatory demands.

(d) Inform nuclear policy with the UK government at the earliest stages.

To do this we will:

- Augment and evolve our relationships with government, by taking a more corporate and disciplined approach to informing policy, providing advice on strategic matters that affect industry safety, and continuing to build relationships at the most senior levels (ministers and officials) through targeted, proactive engagement by our SLT and Board.
- Firmly establish ONR as a strong, credible advisor to government without compromising our independence, by more actively participating in networks that shape policy, and make better use of our insight and expertise to inform policy design and development.

(e) Strengthen our relationships with academia to inform our capability, research and decisions.

To do this we will:

- Put in place a strategic and better co-ordinated approach in how we engage with academia and other professional bodies, to provide those groups with more focus, increase our visibility and credibility, and give more profile to how we work together to further safety outcomes.
- Welcome greater academic insight, as well as peer review, impartial validation and critique of our regulatory framework, to provide additional assurance to the public and to support our continuous improvement.

Strategic Theme 3: Creating a culture of inclusion and excellence

The involvement and support of our staff is fundamental to deliver the priorities under strategic theme two. Our values define how we work internally and externally. That means we expect to see the impact of those values (accountable, open-minded, fair and supportive) in how we engage our stakeholders.

Further, we need every member of ONR to be an advocate for what we do and be able to explain it clearly to stakeholders, orally and in writing. We will drive a culture of excellence for stakeholder engagement through the organisation, to increase buy-in from staff at all levels and help us deliver our messages consistently and in plain English.

Our internal communications, staff engagement activities and Academy training programme will be enablers to achieving those ambitions.

Bring greater focus to improving performance and productivity through training, and enhanced leadership and management capabilities

To do this we will:

- Put in place training and development to enable our staff to have a clear and consistent understanding of best-in-class stakeholder engagement principles and practices, together with hands on up-skilling to make sure all communications are clear and accessible.
- Enhance the use of our internal communications to support staff in their interactions with stakeholders, by providing clear, consistent and accessible information they can share with stakeholders and the public, that better explains what we do and why, and encourages feedback.

Strategic Theme 4: Modernising how we work

To achieve our intent for stakeholder confidence by 2025, modernising our communications and engagement is integral to our approach. This includes streamlining our processes, adopting new technologies and building capability. We've made steady progress, but to go from 'good' to 'great' we have to continue to develop our services and outputs to join best-in-class in standards across government, regulators, and international peers.

Streamline our processes and introduce technology to help us work better and more efficiently

To do this we will:

- Enhance our approach to stakeholder management through better organisational co-ordination, including more clearly defined roles, robust audience segmentation, and adopting customer relationship management principles alongside WIReD, to enable sharper management, targeting, and use of resources to maximise the impact of our external engagement.
- Bring a more human, inclusive, and authentic tone to our content, using storytelling and a consistent strategic narrative to underpin our communications and engagement.
- Move more and more from broadcast information to collaboration and advocacy, to build wider awareness and trust in ONR, beyond those we normally engage with. We will also seek independent, credible voices within and outside the industry to help raise the profile of our work and the key policy areas that we inform, where appropriate to do so.
- Develop new in-house capability to optimise new and existing communication channels, including social media and other digital channels, to modernise our services and enable greater accessibility of our information to stakeholders and the public.
- Launch a fit-for-the-future, user-centric, fully accessible website that meets the requirements of the public and aligns with Government Digital Services' research and best practice.

What success will look like in 2025?

We will be an organisation that is modern, transparent and delivers trusted outcomes and value. This will be demonstrated by stakeholder feedback that confirms we continue to inspire confidence with improved perceptions across proportionality, consistency, efficiency, enabling innovation and consultation on plans/priorities.

We'll be routinely informing government policy, as well as influencing global regulation, with wider reach extending across sectors and borders. A sharper focus on gathering and using feedback to inform our operations and engagement activities will be enabling a more customer-focused approach to our stakeholder and public interactions. This will be supported by more modern, accessible systems and enhanced two-way engagement and consultation, aligned to best-in-class across our peers. And we'll be producing information that is inclusive, accessible and easy to understand.

Our performance will be measured through our Organisational Effectiveness Indicator (OEI) framework. Specifically:

- **OEI 4** – We are open and transparent in our regulation and decisions; and
- **OEI 5** – Stakeholders and dutyholders are confident in our regulation of the industry.

To inform those indicators, we will seek by 2025 to:

- Maintain our performance, measured through our annual stakeholder survey, in those areas where we are strong (80% + positive). This includes being viewed as professional, trusted and independent; and

- Improve our performance by 10 percentage point increase in positive responses, against 2019 benchmarks, across: proportionality (58%), consistency (62%), efficient ways of working (36%), promoting innovation (33%) and engagement on plans/priorities (61%).

In addition to those indicators (tier 3) already reported through established policy and communications directorate arrangements in our OEI framework, we'll also seek to measure our success by:

- Increased satisfaction and trust from newly targeted stakeholder segments, such as academia (measured through the stakeholder survey and feedback from engagements);
- External accreditation for customer service and accessibility;
- Perceptions of ONR as a trusted regulator (measured through media monitoring of sentiment and stakeholder feedback);
- Effectiveness of engagements (measured by routine and systematic feedback, including the RNIP); and
- Improved user satisfaction and engagement across our digital channels (measured through specific surveys, feedback mechanisms and introducing engagement indicators during 2021).