



Office for
Nuclear Regulation

Regulators' Code Self-Assessment 2020

Contents

Introduction.....	1
Our progress.....	2
Table 1 - Self-assessment against Regulators' Code themes	2
Progress against actions	3
Table 2 - Progress on outstanding actions from 2015 self-assessment (published in September 2015).....	4
Table 3 – Progress on outstanding actions from 2017 self-assessment (published in May 2018)	5
Table 4 – New actions identified through 2019/20 self-assessment.....	6
Self-assessment of how our current activity aligns with the Regulators' Code	7
Theme 1 - Regulators should carry out their activities in a way that supports those they regulate to comply and grow	7
Theme 2 - Regulators should provide simple and straightforward ways to engage with those they regulate and hear their views	10
Theme 3 - Regulators should base their regulatory activities on risk	14
Theme 4 - Regulators should share information about compliance and risk.	16
Theme 5 - Regulators should ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities to comply.....	18
Theme 6 - Regulators should ensure that their approach to their regulatory activities is transparent	21
List of complete and on-going actions	24

Introduction

This report details our self-assessment of compliance with the Regulators' Code over the period from our last published report in May 2018 through to March 2020. This includes an update on actions that we have committed to undertake in order to achieve, and move beyond, full compliance with the Code.

Published in 2014, the Regulators' Code comprises six themes and 29 principles, covering openness and transparency, competency, consistency, and risk-informed regulation. We have gone beyond statutory requirements to conduct annual self-assessments by publishing updates (previously in [2015](#) and [2018](#)) and now this one in 2020, which aligns with the end of our Strategy 2015-20.

Our self-assessment indicates we are meeting the requirements of the Regulators' Code, and are continuing to improve in areas that we have targeted - see Table 1. We have made significant improvements since 2018, as our performance continues to follow the upward trajectory seen in previous assessments. Of the six themes in the Code, we have maintained a 'green' (fully compliant) rating on two, and increased three from 'amber' (some changes needed) to 'green'. One theme (theme six) remains 'amber'.

To complete alignment with the Code and bring ourselves into full compliance with theme six, we need to publish service standards to explain what dutyholders can expect from us across our organisation. We have developed a set of standards, consulted on them with the Safety Directors Forum (SDF), and intend to publish them towards the end of 2020.

In line with the ambitions of our [Strategy 2020-25](#), we will continue to seek opportunities to modernise and improve in line with the Code, and go beyond compliance.

Our progress

Table 1 - Self-assessment against Regulators' Code themes

Theme	RAG rating (2018→2020)
Regulators should:	
1. carry out their activities in a way that supports those they regulate to comply and grow;	○ → ○
2. provide simple and straightforward ways to engage with those they regulate and hear their views;	○ → ○
3. base their regulatory activities on risk;	○ → ○
4. share information about compliance and risk;	○ → ○
5. ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities to comply;	○ → ○
6. ensure that their approach to their regulatory activities is transparent.	○ → ○

Progress against actions

During this period we have progressed work on a number of existing actions from previous self-assessments, and have introduced three new actions based on our most recent assessment over 2019/20 (shown in Table 4). Tables 2 and 3 summarise our progress on outstanding actions from the 2015 and 2018 self-assessments. The key actions that we continue to work on to take us to full compliance and beyond compliance are:

- a) Developing clear service standards for what dutyholders can expect from us across the organisation. Following consultation on the draft service standards with the SDF, we expect to publish a finalised version of this towards the end of 2020. Completing this action will bring us into full compliance with the Code under theme six.
- b) Applying the Regulator Nuclear Interface Protocol (RNIP) more consistently and widely, as well as reviewing its effectiveness, to ensure it remains fit for purpose. RNIP is a feedback protocol that allows regulators and dutyholders to consider how effectively they are working together, and allows us to go beyond compliance. We expect to undertake this work as part of our Strategy 2020-25.
- c) Developing our Organisational Effectiveness Indicators (OEI) framework and reviewing its effectiveness to take us beyond compliance with theme six. This work is ongoing.
- d) Playing an active role in cross regulatory working groups, such as government's Radiological Safety Group (RSG), to ensure that businesses with multiple regulators are regulated in a seamless and consistent manner. This helps to deliver coordinated and consistent advice and support to businesses. We are already fully compliant with theme two, and our participation in such groups as the RSG will help us to go beyond compliance.
- e) Establishing provisions for interested parties and the public to be appropriately consulted in the process for making significant regulatory decisions, establishing regulatory guidance or when updating licence conditions. This recommendation was made during the Integrated Regulatory Review Mission (IRRS) to the UK, and will be addressed as part of our Strategy 2020-25. The mission report is available on the [UK Government website](#). This is expected to take us further beyond compliance with theme two.

Table 2 - Progress on outstanding actions from 2015 self-assessment (published in September 2015)

Action	Status
5A. Review the content and layout of our website to make it more user-friendly, specifically tailoring it to our dutyholders by September 2016.	<p>○ On-going</p> <p>We are incrementally improving the usability of our website. However, we are constrained by the need to separate out IT infrastructure and services from the Health and Safety Executive (HSE) in order to modernise our systems and ways of working, as described in our Strategy 2020-25. We expect to begin delivery of a new website in 2021.</p>

Table 3 – Progress on outstanding actions from 2017 self-assessment (published in May 2018)

Action	Status
1. Improve our understanding of the growth duty and fully embed our enabling approach.	<p>○ Complete The growth duty is embedded in our enabling regulation guide, and understanding of cost considerations is included in our inspector training programme.</p>
2. Adopt a more systematic approach to external engagement in development of policies and service standards.	<p>○ Complete Addressed through improvements in our stakeholder engagement, such as consultation on regulatory guidance and our Strategy 2020-25.</p>
3. Review all our appeal routes to ensure they are consistently clear and impartial.	<p>○ Complete Our revised decision review process was published in December 2018.</p>
4. Regularly collate feedback given by dutyholders directly to inspectors and other staff on their experience of regulation.	<p>○ Complete Established mechanisms in place internally, such as through our inspectors, to gather and examine stakeholder insight to ensure effective communications. Annual reviews of safety and security, as well as stakeholder surveys provide further feedback.</p>
5. Review arrangements we have for sharing information with other regulators to ensure they remain effective and fit for purpose.	<p>○ Complete Information sharing is integral to memoranda of understanding (MoUs) and all agency agreements, which are subject to regular reviews. Those arrangements are supported by cross-regulator groups, such as those covering radiological safety and transport regulation.</p>
6. Gather feedback from dutyholders on their experience of accessing and using guidance.	<p>○ Complete Gathered through stakeholder surveys, dutyholder feedback, SDF and consultation on draft guidance.</p>
7. Develop clear service standards for what dutyholders can expect from us across the business.	<p>○ On-going We have consulted on the draft service standards with the SDF and are planning to publish in 2020.</p>
8. Improve our regulatory Key Performance Indicators (KPIs), making them better linked to international standards for nuclear regulators.	<p>○ On-going We have implemented our OEI Framework, which will be further developed.</p>

Table 4 – New actions identified through 2019/20 self-assessment


Action	Status
<p>9. Review the Regulator Nuclear Interface Protocol (RNIP) to see if it remains fit for purpose for ONR and revise information on the website to reflect how it is currently used.</p>	<p>○ On-going We intend to develop an internal, organisation wide framework for gathering feedback and insight. A review of RNIP will be included within that work. This will be addressed through our Strategy 2020-25.</p>
<p>10. Establish cross regulatory working groups to ensure that businesses with multiple regulators are regulated in a seamless and consistent manner.</p>	<p>○ Complete We engage with government's Radiological Safety Group to ensure that regulators with radiological safety responsibilities give coordinated and consistent advice and support to businesses. We also lead and participate in other cross-regulatory groups, such as the Health and Safety Regulators Group.</p>
<p>11. Establish formal provisions for businesses (and other stakeholders) to be appropriately consulted in our process for making significant regulatory decisions, establishing regulatory guidance or when updating licence conditions.</p>	<p>○ Ongoing This action is a part of one of the recommendations made during the IRRS mission to the UK, and will be addressed through our Strategy 2020-25.</p>

Self-assessment of how our current activity aligns with the Regulators' Code

Theme 1  Regulators should carry out their activities in a way that supports those they regulate to comply and grow

Overview

Our last report demonstrated that we were carrying out our activities in a way that supports the growth of our dutyholders, and we have continued to improve our processes and training programmes to go beyond compliance with the Code.

Code Ref	Requirement	How do we meet this requirement	Status
1.1	Regulators should avoid imposing unnecessary regulatory burdens through their regulatory activities and should assess whether similar social, environmental and economic outcomes could be achieved by less burdensome means. Regulators should choose proportionate approaches to those they regulate, based on relevant factors including, for example, business size and capacity.	Whilst our priority is ensuring that all dutyholders maintain the high standards that we expect, our enabling approach, as described in our Enabling Regulation Guide, ensures that this is done in an efficient manner that is tailored as necessary to each dutyholder.	

Code Ref	Requirement	How do we meet this requirement	Status
1.2	<p>When designing and reviewing policies, operational procedures and practices, regulators should consider how they might support or enable economic growth for compliant businesses and other regulated entities. For example, by considering how they can best:</p> <ul style="list-style-type: none"> • understand and minimise negative economic impacts of their regulatory activities; • minimising the costs of compliance for those they regulate; • improve confidence in compliance for those they regulate, by providing greater certainty; and • encourage and promote compliance. 	<p>When designing and reviewing policies, we apply our enabling approach. This helps to minimise the costs and negative impacts on businesses, which improves compliance and confidence in our regulations.</p> <p>For example, we made advances in the way we support dutyholders to comply and grow with our Generic Design Assessment (GDA) modernisation and Advanced Nuclear Technology (ANT) vendor engagement.</p> <p>We continue to improve our consideration of costs of our regulation:</p> <ul style="list-style-type: none"> • In line with government policy, we have made our process for consideration of costs under the Business Impact Target (BIT) more focused. The economic impact of all our regulatory measures that come in scope of the BIT such as our guidance, are considered in this way and we report to Parliament on any significant impacts. • Following on from the recommendations of the NERA report we have developed a process to consider the cost of regulatory decisions, and we have committed to being clear about the costs of our regulatory decisions in our Strategy 2020-25. 	○

Code Ref	Requirement	How do we meet this requirement	Status
1.3	Regulators should ensure that their officers have the necessary knowledge and skills to support those they regulate, including having an understanding of those they regulate that enables them to choose proportionate and effective approaches.	<p>We have an extensive training programme for our inspectors, and we recruit a diverse range of specialists in terms of experience, specialism and background.</p> <p>The ONR Academy provides effective training and development to all our staff, and our inspectors are further trained, mentored and subject to an assessment of their competency prior to being issued with a full warrant. They are then subject to periodic reassessment every five years to ensure their understanding of the law remains valid. Our warranting process is checked against international expectations by the International Atomic Energy Agency (IAEA).</p>	○
1.4	Regulators should ensure that their officers understand the statutory principles of good regulation and of this Code, and how the regulator delivers its activities in accordance with them.	<p>In our enforcement policy statement we set out five principles of enforcement. These principles align with the Regulators' Code and form a key element of our core inspector training.</p> <p>As indicated above, our inspectors are assessed on their understanding of these principles of the law as part of the warranting and re-warranting process.</p>	○


Theme 2 Regulators should provide simple and straightforward ways to engage with those they regulate and hear their views

Overview

We have gone from 'amber' to 'green' status on this theme since the last report following the delivery of all of our original actions. Effective engagement continues via liaison groups, and our use of social media channels and webinars have provided a new way for our stakeholders to engage with us directly.

Code Ref	Requirement	How do we meet this requirement	Status
2.1	Regulators should have mechanisms in place to engage those they regulate, citizens and others to offer views and contribute to the development of their policies and service standards. Before changing policies, practices or service standards, regulators should consider the impact on business and engage with business representatives.	<p>Our new Strategy 2020-25 highlights our commitment to openness and transparency.</p> <p>Effective regular engagement is undertaken with a diverse range of stakeholders, including the Safety Directors Forum (SDF), local site groups and our NGO forum. Our extended use of webinars and social media channels provides a new direct way for our stakeholders to engage.</p> <p>We consult on aspects of our regulatory guidance and conducted extensive engagement and consultation on our new strategy.</p>	

Code Ref	Requirement	How do we meet this requirement	Status
2.2	<p>In responding to non-compliance that they identify, regulators should clearly explain what the non-compliant item or activity is, the advice being given, actions required or decisions taken, and the reasons for these. Regulators should provide an opportunity for dialogue in relation to the advice, requirements or decisions, with a view to ensuring that they are acting in a way that is proportionate and consistent.</p> <p>This paragraph does not apply where the regulator can demonstrate that immediate enforcement action is required to prevent or respond to a serious breach or where providing such an opportunity would be likely to defeat the purpose of the proposed enforcement action.</p>	<p>The conclusions of our site interventions are always shared, discussed and agreed with dutyholders before inspectors leave site, and the need to clearly explain non-compliance is an integral part of inspector training.</p> <p>Our dutyholders regularly engage with inspectors to discuss regulatory action, and also have opportunities to discuss action at senior levels in ONR where appropriate.</p>	○
2.3	<p>Regulators should provide an impartial and clearly explained route to appeal against a regulatory decision or a failure to act in accordance with this Code. Individual officers of the regulator who took the decision or action against which the appeal is being made should not be involved in considering the appeal. This route to appeal should be publicised to those who are regulated.</p>	<p>We welcome challenge on our regulatory decisions, and have a formal decision review process to ensure that challenges are handled in a clear and impartial manner.</p> <p>Dutyholders are able to challenge inspectors during regulatory interactions, and escalate issues through regular meetings as necessary before formal channels are needed. Most issues are in fact successfully resolved through routine engagement.</p>	○
2.4	<p>Regulators should provide a timely explanation in writing of any right to representation or right to appeal. This explanation should be in plain language and include practical information on the process involved.</p>	<p>Our model enforcement letter gives a clear description of the appeal route for enforcement action.</p>	○

Code Ref	Requirement	How do we meet this requirement	Status
2.5	Regulators should make available to those they regulate, clearly explained complaints procedures, allowing them to easily make a complaint about the conduct of the regulator.	Our formal complaints process is easily accessible on our website.	

Code Ref	Requirement	How do we meet this requirement	Status
2.6	Regulators should have a range of mechanisms to enable and regularly invite, receive and take on board customer feedback, including, for example, through customer satisfaction surveys of those they regulate.	<p>We have a range of mechanisms that make us compliant with this aspect of this theme. However, we are working to continually improve the way in which we engage our stakeholders to receive feedback on the way that we regulate.</p> <p>One key mechanism that we use is the Regulatory Nuclear Interface Protocol (RNIP), which is a feedback protocol that allows regulators and dutyholders to consider how effectively they are working together. This supports effective dutyholder engagement, providing timely feedback after each interaction. The mechanism provides for instant feedback and is currently limited to our Regulatory Directorate, but we believe that it could be applied more widely across all stakeholder engagement. Now that RNIP has had some time to become established, we are now focusing on reviewing its effectiveness and the consistency of its application to ensure it is fit for purpose.</p> <p>We have also introduced methods to collect additional dutyholder feedback as part of the annual reviews of safety and security. This is in addition to our annual stakeholder survey.</p> <p>Although we have met the standard expected by the Code we are aiming to go further to better co-ordinate stakeholder engagement, as set out in our Strategy 2020-25. This will be achieved through initiatives such as the gathering of more systematic feedback, and using our Well Informed Regulatory Decisions (WIReD) programme to capture our customers' perspective.</p>	○

Theme 3 ○ Regulators should base their regulatory activities on risk

Overview

We are mature in this area and routinely design our regulatory activities based on risk. We are moving beyond compliance on this theme by introducing programmes such as WIReD to ensure that our inspectors have the best possible access to the evidence that they need to make decisions in an efficient manner.

Code Ref	Requirement	How do we meet this requirement	Status
3.1	Regulators should take an evidence based approach to determining the priority risks in their area of responsibility, and should allocate resources where they would be most effective in addressing those priority risks.	<p>We are mature in this area and routinely design our regulatory activities based on risk. Our planning is based on risk through well-embedded processes. For example using prioritisation lists to allocate resources to address the highest risks first.</p> <p>WIReD is intended to improve our inspectors' ability to access information quickly and easily which will help to ensure that their approach is based on the latest evidence.</p>	○
3.2	Regulators should consider risk at every stage of their decision-making processes, including choosing the most appropriate type of intervention or way of working with those regulated; targeting checks on compliance; and when taking enforcement action.	<p>Our outlook is fundamentally risk based, and we have a well-established regulatory planning function that considers risk well. Our Enforcement Management Model describes the risk-based criteria against which decisions are made.</p> <p>We continue to improve the way we internally test our performance in this area. Following our preliminary assurance mapping exercise we now routinely reinforce the importance of ensuring that our reviews fully cover the five purposes of ONR, and also that they are informed by the detailed descriptions of risks in our Strategic Risk Register and lower tier risk registers.</p>	○

Code Ref	Requirement	How do we meet this requirement	Status
3.3	Regulators designing a risk assessment framework, for their own use or for use by others, should have mechanisms in place to consult on the design with those affected, and to review it regularly.	We have good mechanisms in place to consult on our frameworks, as demonstrated by the successful engagement with the consultation that we have held previously on our Security Assessment Principles (SyAPs) and Safety Assessment Principles (SAPs).	○
3.4	Regulators, in making their assessment of risk, should recognise the compliance record of those they regulate, including using earned recognition approaches and should consider all available and relevant data on compliance, including evidence of relevant external verification.	We recognise the compliance record of those we regulate within our Enforcement Management Model, and work with internal regulators to ensure credit is taken for other forms of assurance at sites that are broadly compliant.	○
3.5	Regulators should review the effectiveness of their chosen regulatory activities in delivering the desired outcomes and make any necessary adjustments accordingly.	<p>We regularly review the impact of our regulatory strategy by overseeing the performance of all the dutyholders we regulate in our regulatory divisions and sub-divisions. We discuss dutyholder performance in our Quarterly Site Reports, which are published on our website and discussed with site stakeholder groups and local liaison committees.</p> <p>We have also reviewed our process and guidance to inspectors for the assignment of regulatory attention levels. This has resulted in a more systematic process that strengthens the evidential basis by which attention levels are assigned.</p> <p>Our outcome based approach to regulating safety and security means that both we, and our dutyholders, are focused on delivering the desired outcomes in a flexible manner.</p>	○

Theme 4 ○ Regulators should share information about compliance and risk

Overview

Our approach to regulation is fundamentally risk based, focus on helping our dutyholders to achieve compliance by engaging proactively. We have a close working relationship with other regulators, which allows us to minimise the duplication of regulatory requests, and ensure that the information we hold is shared wherever feasible to improve regulatory efficiency.

Code Ref	Requirement	How do we meet this requirement	Status
4.1	Regulators should share information about compliance and risk.	<p>As we have regulatory oversight of nuclear safety, health and safety (on nuclear sites), nuclear security, and the transport of radioactive material, we regularly work on similar topics to other regulators. In order to regulate efficiently and avoid duplication, we maintain a good relationship with regulatory colleagues and share information as appropriate. A good example of this is in our Generic Design Assessment for new reactors, where the Joint Programme Office works with the Environment Agency to avoid duplication of requests.</p> <p>We are also working to deliver ALARP training to other regulators to help them to introduce an enabling approach for themselves.</p>	○

Code Ref	Requirement	How do we meet this requirement	Status
4.2	When the law allows, regulators should agree secure mechanisms to share information with each other about businesses and other bodies they regulate, to help target resources and activities and minimise duplication.	<p>We regularly work with other regulators to target activities and minimise duplication. We do this well by regularly carrying out joint inspections with other regulators including the UK environmental regulatory bodies and HSE.</p> <p>We have strengthened our processes and governance around agreements and continue to make progress in reviewing outstanding agreements past their three year review point. In particular, we have significantly improved these processes in relation to the transport of radioactive material. In October 2019, we established six monthly liaison meetings to strengthen working relationships between regulators, which regulate the transport of radioactive waste. This has enabled us to establish points of contact and gain a better understanding of each other's vires. This has also allowed us to share knowledge and intelligence, as well as identify regulatory gaps and review the adequacy of existing formal agreements and MoUs.</p> <p>We also work with other regulators internationally via membership and participation in international groups and fora to give efficient delegations for these meetings. Our International Regulatory Cooperation (IRC) has been recognised as exemplary in the OECD UK IRC review, as we have a strategic framework in place for our international engagement to ensure we share examples of good practice and learn from other nuclear regulators around the world.</p>	○

Theme 5 ○ Regulators should ensure clear information, guidance and advice is available to help those they regulate meet their responsibilities to comply

Overview

We ensure that our dutyholders are able to easily find and understand the guidance and advice that we issue to comply with our regulations in a straightforward manner.

Code Ref	Requirement	How do we meet this requirement	Status
5.1	Regulators should provide advice and guidance that is focused on assisting those they regulate to understand and meet their responsibilities. When providing advice and guidance, legal requirements should be distinguished from suggested good practice and the impact of the advice or guidance should be considered so that it does not impose unnecessary burdens in itself.	<p>We publish our guidance to dutyholders and our internal guidance regarding whether dutyholders are adequately reducing risks. Our data shows that viewing this is the main reason people visit our website.</p> <p>Examples of how we describe the relationship of law to guidance can be found in our Technical Inspection Guides (TIGs) and Technical Assessment Guides (TAGs).</p>	○
5.2	Regulators should publish guidance and information in a clear, accessible, concise format, using media appropriate to the target audience and written in plain language.	<p>We do this well, with all assessment principles and assessment and inspection guides published on our website and by taking on-board dutyholder views during consultations (e.g. SAPs and SyAPs).</p> <p>We also use channels such as social media platforms to publish news and information in a clear and concise format for our stakeholders and the public.</p>	○

Code Ref	Requirement	How do we meet this requirement	Status
5.3	Regulators should have mechanisms in place to consult those they regulate in relation to the guidance they produce to ensure that it meets their needs.	<p>We regularly consult with groups such as the SDF, which includes senior-level representatives responsible for safety from across the industry.</p> <p>We also hold public consultations on aspects of our guidance, such as the Approved Code of Practice for the new emergency planning regulations (REPPIR 2019) and include an explanation of how comments are addressed.</p>	○
5.4	Regulators should seek to create an environment in which those they regulate have confidence in the advice they receive and feel able to seek advice without fear of triggering enforcement action.	<p>Our goal setting regulatory regime encourages early engagement with dutyholders to seek advice on compliance. Our Enabling Regulation guide further promotes this constructive approach, as dutyholders are given clear and prioritised safety and security outcomes, which can inform their conversations with us.</p> <p>Our stakeholder survey results and dutyholder feedback show that the majority of dutyholders consider they have an effective working relationship with ONR.</p>	○
5.5	In responding to requests for advice, a regulator's primary concerns should be to provide the advice necessary to support compliance, and to ensure that the advice can be relied on.	Our primary concern is that our dutyholders meet the high standards required by legislation and our guidance. Our goal setting regulatory regime and Enabling Regulation guide demonstrate to our dutyholders that supporting their compliance is our primary concern.	○

Code Ref	Requirement	How do we meet this requirement	Status
5.6	Regulators should have mechanisms to work collaboratively to assist those regulated by more than one regulator. Regulators should consider advice provided by other regulators and, where there is disagreement about the advice provided, this should be discussed with the other regulator to reach agreement.	<p>To minimise regulatory burden, we conduct joint inspections with other regulators which has allowed us to develop a coherent approach and provide consistent advice. Where advice could conflict with the advice of other regulators, our inspectors discuss the issue with other regulators to agree a solution before advising dutyholders.</p> <p>We have a number of MoUs with other regulators to ensure effective joint working, and we consult with other regulators as part of the permissioning process.</p>	○

Theme 6 ○ Regulators should ensure that their approach to their regulatory activities is transparent

Overview

We regularly exceed our publication obligations, including on our concerns and complaints, and we have developed an Organisational Effectiveness Indicator (OEI) framework, aligned to the OECD Nuclear Energy Agency (NEA) Characteristics of an Effective Regulator to measure our own effectiveness.

Code Ref	Requirement	How do we meet this requirement	Status
6.1	Regulators should publish a set of clear service standards, setting out what those they regulate should expect from them.	<p>We expect to publish our service standards towards the end of 2020, so do not currently have a clear published list of service standards. However, dutyholders may use our plans and strategies to know what to expect from us.</p> <p>At a corporate level we publish our annual plan that dutyholders can measure our performance against. At an ONR Regulatory divisional level we share strategies and plans with dutyholders, so they know what to expect. At a site level, we share intervention strategies and plans.</p>	○

Code Ref	Requirement	How do we meet this requirement	Status
6.2	<p>Regulators' published service standards should include clear information on:</p> <ol style="list-style-type: none"> how they communicate with those they regulate and how they can be contacted; their approach to providing information, guidance and advice; their approach to checks on compliance, including details of the risk assessment framework used to target those checks as well as protocols for their conduct, clearly setting out what those they regulate should expect; their enforcement policy, explaining how they respond to non-compliance; their fees and charges, if any. This information should clearly explain the basis on which these are calculated, and should include an explanation of whether compliance will affect fees and charges; and how to comment or complain about the service provided and routes to appeal. 	<p>We expect to publish our service standards towards the end of 2020, so do not currently have a clear published list of service standards. However, we do publish information on what dutyholders can expect, for example:</p> <ul style="list-style-type: none"> We have a range of clear and well-established communication routes via site inspectors, delivery leads and divisional directors for licensed sites and authorised defence sites to engage with us; We explain our enforcement policy and regulatory framework in the Enforcement Management Model, Enforcement Policy Statement and SAPs, which are all published on our website; We have published other guidance, including TIGs, TAGs and an Applicant Guide for Transport dutyholders on our website; and We have a complaints procedure published on our website. 	○
6.3	<p>Information published to meet the provisions of this Code should be easily accessible, including being available at a single point⁷ on the regulator's website that is clearly signposted, and it should be kept up to date.</p>	<p>In 2015 and 2018, we published our self-assessments of our compliance with the Regulators' Code, which provided a review of where we were meeting the requirements of the Code, while also highlighting areas for improvement. This report describes progress against the actions from those reviews, and provides an update on how well our activity currently aligns with the Code based on the self-assessment we completed during 2019/20.</p> <p>This report will be available on our website.</p>	○

Code Ref	Requirement	How do we meet this requirement	Status
6.4	Regulators should have mechanisms in place to ensure that their officers act in accordance with their published service standards, including their enforcement policy.	<p>We use key performance indicators to ensure we deliver the levels of service to which we have committed.</p> <p>As part of our continuous improvement activity we are working to enhance the quality of our effectiveness measures through the application of our OEI framework.</p>	○
6.5	Regulators should publish, on a regular basis, details of their performance against their service standards, including feedback received from those they regulate, such as customer satisfaction surveys, and data relating to complaints about them and appeals against their decisions.	<p>International peer reviews, such as the IAEA's International Physical Protection Advisory Service (IPPAS) and IRRS missions assist member states to strengthen their national security and safety regimes. Our regulation is scrutinised against international standards during these regular reviews and the reports of IRRS missions are published. The most recent mission to the UK, which ONR co-ordinated, was in autumn 2019 and the report is available on gov.uk</p> <p>During 2018/19, we developed and implemented what we believe to be the world's first OEI framework for measuring our effectiveness as a regulator, which we report against in our annual report and accounts. We also publish the results of our annual stakeholder surveys.</p>	○

List of complete and on-going actions

Action	Progress	Date	Status
Ensure that the growth duty is understood throughout the organisation, and is part of any decision-making procedure that may affect a business, for completion by the end of December 2016.	Our Enabling Regulation guide published in February 2018 embeds the expectation that ONR will carry out our activities in a way that supports those we regulate to comply and grow. Understanding of cost considerations has been included in our inspector training programme to reinforce this.	2015	Complete
Undertake a review of its economic impact on dutyholders, for completion by April 2016.	Review complete, published at: http://www.onr.org.uk/corporate-publications.htm	2015	Complete
Implement changes in relation to reporting on whistleblowing over the next financial year (2015/16).	The changes were implemented. Our website was updated making it easier to report a concern / complaint or whistle blow.	2015	Complete

Action	Progress	Date	Status
<p>Seek ways to engage with dutyholders in a more holistic fashion, to ensure that a broader spectrum of dutyholders have the opportunity to comment on our performance.</p>	<p>We undertook our first external stakeholder survey in October 2017 to gain feedback from our stakeholders. A summary of outcomes can be found at:</p> <p>https://content.govdelivery.com/accounts/UKHSEONR/bulletins/1dbf983</p> <p>The survey gives us a baseline to improve future engagement on our performance.</p> <p>We undertook our second external stakeholder survey in October / November 2018 and our 2019 survey is due to be published soon.</p>	2015	Complete
<p>Progress current projects (licence conditions review, update to NORMS and risk policy review) to deliver measureable improvements to the regulatory regime by the end of 2017.</p>	<p>Improvements in the regulatory regime have been delivered:</p> <ul style="list-style-type: none"> • The update to NORMS has been delivered by the publication of our Security Assessment Principles (SyAPs). This aligns our nuclear security regulatory framework with our goal-setting nuclear safety framework, providing dutyholders with a coherent regulatory approach across the civil nuclear industry. • In June 2017 we published our Risk Informed Regulatory Decision Making guidance, delivering our project on risk policy review. • The licence condition review looked at potential changes to the licence conditions and remains under consideration by our Senior Leadership Team. 	2015	Complete

Action	Progress	Date	Status
Continue to engage with the Better Regulation Delivery Office's (BRDO) project to develop ways which information can best be shared between our organisation and other regulators.	We engaged with BRDO in the Data Sharing for Non-Economic Regulators project which reported in 2015. While there were no specific actions for ONR, we continue to engage with government on Better Regulation.	2015	Complete
Review the content and layout of our website to make it more user-friendly, specifically tailoring it to our dutyholders by September 2016.	We are incrementally improving the usability of our website. However, we are constrained by the need to separate out IT infrastructure and services from HSE in order to modernise our systems and ways of working, as described in our Strategy 2020-25.	2015	Ongoing
Establish a small business appeals champion as required by future legislation, and report annually on the numbers of whistleblowing disclosures that we have received (by April 2016, subject to legislation).	Legislation has not yet come forward on the small business appeals champion. We report all whistleblowing disclosures both to our Audit and Risk Assurance Committee and in our annual report with regular reviews to consider any lessons learnt.	2015	Complete
Adopt a more systematic approach to external engagement in development of policies and service standards.	Action taken forward in stakeholder engagement improvement plan.	2018	Complete
Review all our appeal routes to ensure they are consistently clear and impartial.	Revised decision review process published in December 2018.	2018	Complete

Action	Progress	Date	Status
Regularly collate feedback dutyholders have given direct to inspectors and other staff on their experience of regulation.	Established internal mechanism to gather and examines stakeholder insight to ensure effective communications.	2018	Complete
Review the arrangements we have for sharing information with other regulators to ensure they remain effective and fit for purpose.	Information sharing is integral to MoUs, and all agency agreements are subject to regular reviews.	2018	Complete
Gather feedback from dutyholders on their experience of accessing and using guidance.	Complete.	2018	Complete
Develop clear service standards for what dutyholders can expect from us across the business.	We have consulted on the draft service standards with SDF and are planning to publish these by the end of 2020.	2018	Ongoing
Improve our regulatory Key Performance Indicators (KPIs), making them better linked to international standards for nuclear regulators.	Implemented our Organisational Effectiveness Indicator (OEI) Framework, which will be further developed.	2018	Ongoing
Review the Regulator Nuclear Interface Protocol (RNIP) to see if it remains fit for purpose for ONR and revise the information on the ONR website to reflect how it is currently used.	We intend to develop an organisation wide framework for gathering feedback and insight. A review of RNIP will be included within that work, and it will be progressed as part of our Strategy 2020-25.	2018	Ongoing

Action	Progress	Date	Status
Establish cross regulatory working groups to ensure that businesses with multiple regulators are regulated in a seamless and consistent manner.	We engage with government's Radiological Safety Group to ensure that regulators with radiological safety responsibilities give coordinated and consistent advice and support to businesses. We also lead and participate in other cross-regulatory groups, such as the Health and Safety Regulators Group.	2019	Complete
Establish provisions for interested parties and the public to be appropriately consulted in its process for making significant regulatory decisions, establishing regulatory guidance or when updating licence conditions.	This action is a part of one of the recommendations made during the IRRS mission to the UK, and will be addressed through our Strategy 2020-25.	2020	Ongoing