Response to consultation on ONR’s Policy for openness and transparency

March 2023

Contents

[Introduction 1](#_Toc131072581)

[Analysis of responses 2](#_Toc131072582)

[Review of comments 3](#_Toc131072583)

[Conclusion 7](#_Toc131072584)

# Introduction

ONR’s policy for openness and transparency sets out the guiding principles we will apply in our disclosure of information, and in our communications and engagement with interested stakeholders and the public. It also covers how we operate now, and our intentions for future excellence, in line with relevant legislation and guidance.

As an independent regulator working to protect society by securing safe nuclear operations, it is right that interested stakeholders and the public have access to how, when, and why we make the decisions we do.

ONR has sought to be open and transparent in the development of this policy through engagement with its stakeholders, and with its staff to ensure it has been informed by their views.

Between 21 November 2022 and 16 December 2022, we carried out a public consultation to gather views and feedback to help us refine the policy.

Analysis of the consultation responses, in relation to the specific questions, identified the following common themes:

* How will the policy improve ONR’s openness and transparency
* Suggestions enhanced accessibility
* The addition of a public register
* Providing clarity in specific instances, i.e. investigations why we can’t be more transparent
* Providing more information on topics people would like to hear about
* General drafting points on the policy itself and quality assurance of all of ONR’s published documents

The responses to the consultation have helped shape the policy further and this report summarises how we have considered comments received. We thank all those who took the time to respond with views and comments as part of the consultation exercise and help us refine the policy.

# Analysis of responses

We received 28 responses to the consultation (16 external and 12 internal). All comments received were collated and carefully considered (see table 1 & 2).

Overall, the responses received were positive and supportive of the policy, welcoming clear direction, commitment and the specific actions we will take. Opinion was equally divided as to whether it will improve our openness and transparency and increase confidence in us, but it was generally viewed as the right policy to have as a nuclear regulator.

## Table 1

| Question posed by ONR (external) | Responses received (16) |
| --- | --- |
| To what extent do you support, or not support, ONR’s policy for openness and transparency? Why do you think this? | 10 |
| Do you think the actions in the policy will enable ONR to be a more open and transparent regulator? If yes, how? If no, why? | 9 |
| Are there any additions you would like to see in the policy and why? | 8 |
| Are there any aspects of the policy that you think could be clearer and/or better explained, and why? | 9 |
| To meet the policy commitment to make information available about the topics that interest ONR’s stakeholders it would be useful to know which additional topics you would like information on | 8 |

## Table 2

| Question posed by ONR (internal) | Responses received (12) |
| --- | --- |
| Do you think this policy will improve ONR’s openness and transparency? | 12 |
| Do you think this policy will increase public trust and confidence in ONR? | 12 |
| Is there more ONR could do to further promote openness and transparency? | 12 |
| How confident do you feel talking to interested stakeholders and the public about ONR’s role and work? | 12 |
| What topics do you think interested stakeholders and the public want to hear more about from us? | 7 |
| Is there anything else you would like to feed back about our draft policy? | 4 |

# Review of comments

Analysis of the comments revealed a number of common themes (Table 3) which enabled development of our consolidated responses, which where applicable have been addressed within the policy.

## Table 3

| Theme | Action by ONR |
| --- | --- |
| How the policy will improve ONR’s Openness and Transparency in the future | The policy has been updated to reflect that ONR has a role to influence the industry and to champion effective skills, capability, public information and disclosure.  The public involvement section now more accurately reflects that whilst public opinion is not the basis for ONR decisions, the intent is to be mindful of views in an appropriate and proportionate way. ONR supports involvement in all its forms as a basis for its engagement work.  It has also been noted that there is a clear ambition to widen the range of opportunities available for voices to be heard through making our communications more accessible, diversifying communications and engagement channels and reaching new audiences. |
| Ensure ONR are able to clearly demonstrate the developments achieved through the outputs from the policy | In response to feedback we revisited the ‘Engage’ and ‘Consult’ tiers of the ONR framework and further background information has been added to the policy.  This includes additional clarity provided on how the policy will be measured and also a commitment to develop Key Performance Indicators as part of the engagement planning cycle. |
| Develop wider communications channels for the public including suggestions for the publishing of a public register on the ONR website. | The commitment to developing a new engagement plan for the organisation will enable the planning and implementation of a range of communications and engagement channels that will be designed to support audience segments identified during the planning process. This will be both better engagement with existing and new audiences.  The addition of a public register to the ONR website is one of a range of measures being considered as part of wider developments to ONRs online presence. |
| Providing more information on topics people would like to hear about i.e. Waste disposal (Geological disposal facilities), public safety and nuclear new builds.  Publish additional details to support and influence industry and improve visibility of ONR’s work, for example in security. | Work is ongoing to identify topics of interest to stakeholders and related engagement to support understanding.  Through this policy we have made further commitment to:   * Be more accountable in explaining our regulatory role and develop a stakeholder involvement programme; * Be more accessible and willing to develop a wider series of engagement opportuni-ties, for example arranging more local meetings; * Develop greater confidence in continuous improvement, face to face interactions and listening and acting where appropriate. |
| Clarity for ONR staff on the level of information that can or can’t be shared | Whilst the ONR workforce will continue to be governed by a range of legal frameworks, commercial sensitivity and regulatory restrictions on information it can share, we are committed to develop learning tools to enable our workforce to have engaging, two-way conversations with stakeholders where appropriate. This will maximise opportunities for learning and sharing of information. |
| General drafting points on the policy itself and quality assurance (QA) of all ONR’s published documents | The final document has undergone a clear and concise theme, tone and language check, including formatting and checking of hyperlinks prior to publication.  The public disclosure section has been re-positioned to address comments made in response to the perceived tone.  QA of the wider ONR publication schedule will be considered further by ONR’s Head of Communications, including developing accessibility of documents. |

# Conclusion

We have given careful consideration to the consultation responses we received, the majority of which were supportive of our approach. Overall, the message is positive, but ONR needs to continue to build upon its approach to openness and transparency to enhance public trust and confidence.

A key next step is the development of an internal engagement strategy that embeds the key principles from this policy and enables us inform, engage and collaborate with a wide range of stakeholders and the public. We will continue to keep stakeholders informed of further developments and opportunities to get involved in shaping future work.

© Office for Nuclear Regulation, 2023

Any enquiries related to this document should be sent to [contact@onr.gov.uk](mailto:contact@onr.gov.uk)

Published 03/2023