



Office for
Nuclear Regulation

ONR strategy 2020-25

Consultation response

May 2020

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Any enquiries regarding this publication should be sent to us at: contact@onr.gov.uk

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1. Introduction

This report presents the response to the outcome of our public consultation on the ONR strategy 2020-25. The strategy sets our direction and priorities for the next five years, building on our strengths, continuing to focus on protecting society, and addressing the changing demands we face as the UK's nuclear regulator.

2. Engagement with stakeholders

We engaged with stakeholders on our new strategy for over 12 months, in order to secure their early and meaningful involvement to shape our future direction and priorities.

We were hugely grateful for the input received as it informed and improved the final document. Input ranged from one-to-one conversations, roundtable discussions, group meetings, our 2019 Industry Conference and correspondence from you directly. We spoke in detail with our Board, those we regulate, senior representatives of the nuclear industry, non-governmental organisations (NGOs), local and national pressure and campaign groups, other regulators, government, and, of course, our staff.

We considered every suggestion and welcomed your overwhelmingly positive comments. You gave us hundreds of wide-ranging views, giving us clear direction in some areas:

Mission and Vision

Our mission is our reason for being, supported by our vision of how ONR will be by 2025.

You told us that our mission needed to focus more sharply on what we are here to do - protecting society, and that you most wanted us to remain true to our fundamental regulatory purpose. This will always be at the heart of what we do and the final document clearly reflects this.

Some of you wanted our mission to be more specific and detailed but we have deliberately taken a high-level approach that will take us to 2025.

We will protect society by securing safe nuclear operations.

You wanted our vision to clearly articulate where we will be in 2025 and to build on our strengths while aspiring to be a modern and transparent regulator. We are not starting from scratch or changing direction, but we are developing and adjusting to the changing environment around us. Again, some of you had suggested more detail here, but much of what you proposed around trust, confidence and collaboration is addressed later in the Strategic Themes.

By 2025 we will be a modern, transparent regulator delivering trusted outcomes and value.

Strategic Theme One - Influencing proportionate improvements

- Agility to respond to change: you wanted the strategy to reflect the uncertain operating and regulatory demands and ensure the shape of our organisation allowed us to be nimble and responsive.
- Welcoming innovation: you wanted us to be clearer that we welcome new ideas and new approaches and were open to new technologies and support innovative ideas and ways of working.
- You praised our enabling regulation philosophy, but asked that we put even greater focus on ensuring our decisions are demonstrably consistent and proportionate.
- Many of you asked us to be clearer about the costs of our regulatory decisions.
- There were some calls to have specific areas of work highlighted and where appropriate we have. However, this is a high-level document - our corporate and divisional plans properly reflect the detail of individual workstreams.

Strategic Theme Two - Inspiring stakeholder confidence

- Lots of you recognised and praised the work we already do in this area but many of you wanted us to be even more outward-facing and to engage and influence more, for example, locally, with government, other regulators and key decision-makers.
- Learning from others: you wanted us to ensure we worked closely with domestic and international organisations and groups – including other sectors - to share our knowledge, align regulatory approaches and strengthen our relationships with academic and technical institutions to help inform our research and decision-making, and improve capability.
- Transparency: you wanted us to be even more transparent; while recognising some of the improvements we have already made, you felt we should go further to ensure we are open and transparent.

Whilst most comments from our stakeholders were understandably focused on Strategic Themes One and Two, we did receive views on the more internally focused themes Three and Four:

Strategic Theme Three - Creating a culture of inclusion and excellence

- Some of you wanted us to be better at seeking feedback and demonstrating how we change as a result. This was both in terms of feedback from those we regulate, but also from the public.
- You felt we should be embracing and embedding diversity and inclusion into a caring culture, with a greater focus on wellbeing and mental health support.
- You told us that we needed to develop leaders further at all levels through the organisation, who are role models for ONR internally and externally.

Strategic Theme Four - Modernising how we work

- Some of you told us that as a responsible regulator funded by the nuclear industry and taxpayers we needed to be cost-effective and efficient. You wanted us to consider modernising our operations to make it easier for our staff to do their jobs well, streamlining our processes and using digital applications as the norm, so that we can share information more easily.

3. Public consultation

The formal public consultation ran for four weeks from 15 January 2020 to 11 February 2020. We communicated the launch via our website and direct mailing to our stakeholders with a particular interest, such as dutyholders, local authorities and NGOs. We held a webinar during the consultation to allow for further questions and discussion.

4. Response demographics

We received 12 separate responses to the consultation from a wide range of stakeholders.

Sector	Number of responses
Other regulators	2
Dutyholders	2
NGOs	4
Members of the public	2
Non-departmental public bodies	1
Local government	1

5. Analysis of responses

All of the comments received during the consultation on the strategy document were welcomed and valued. Overall responses were extremely positive and supportive of ONR, our work and focus. The responses endorsed much of the work we already do and many of the new elements of our strategy, including our mission and vision.

Key themes receiving strong support were our commitment to work more collaboratively with domestic regulators, strengthening our academic and research links, our organisational values, and the emphasis given to stakeholder confidence. Our continued engagement with the NGO and local interest community is clearly valued by those groups and there is appetite for this to continue. Our continued focus on enabling regulation and being a modern and transparent regulator were also welcomed.

We carefully considered all of the comments received and several changes adopted as a result, as shown in the table below. We also addressed any typographical or plain English suggestions. Comments outside of the scope of the consultation were passed to the relevant teams in ONR for further consideration where appropriate.

You said	We did
There should be more emphasis on climate change/net zero including local impacts and action ONR will take as an organisation.	Climate change was already covered within the strategy, but we added further references including to local impacts and the environmental impact of ONR's activities as an organisation.
You should acknowledge the changing nuclear landscape.	Section two, 'What has influenced us' gives a strong sense of this, but we also added specific reference to the changing landscape within the introduction, and grouped the factors for ease of reading.
Can you emphasise the long term as well as now.	We amended the text in ONR's purpose to reflect this better.
There should be more emphasis on ONR's enforcement powers.	We addressed this in Strategic Theme One.
You should acknowledge the diverse range of stakeholders in the nuclear arena.	Whilst this is implicit in Strategic Theme Two, we added explicit reference to the wide range of views held by our stakeholders.
Importance of local government should be recognised.	We agreed that as valued stakeholders, local government should be reflected and we have done so.
Should give more prominence to the role of International Safety Standards such as those from IAEA.	We agreed that International Safety Standards play a key role in global nuclear safety but did not amend the text as we thought the current references to respected international parties and influencing standards at home and abroad were sufficient.
ONR should have a greater role in reducing the Carbon Footprints of the nuclear sites within their sphere of responsibility.	This is not within our legal powers, but we recognise the importance of this work and will support sharing of best practice where possible.
You should give more prominence to ONR's new safeguards role and the impact of EU Exit.	We added a reference to the section on what has influenced us.

You said	We did
Request to specifically name the other regulators we intend to engage with.	Whilst we understood this request we did not alter our text. This is a high-level, strategic document that must remain up to date to 2025.
You should explicitly recognise waste management as well as decommissioning.	We added reference to waste management as requested in Strategic Theme One.
Include reference to Site Stakeholder Groups and Local Liaison Committees.	We did not amend the text. ONR engages with many stakeholders and it would not be possible to detail them all individually.
You should take note of Licensees that would like to exit the industry in the short term.	We removed the reference to 'long term' in the section on 'what has influenced us' so that both short and long term is implicit.

6. Next Steps

Upon publication, we look forward working with you to achieve all we have set out.