

ENSREG Principles for Openness and Transparency: Survey on the implementation

In 2011, ENSREG adopted a set of principles for National Regulatory Organisations (NRO) on Openness and Transparency. As part of the process for reviewing and updating the principles, a survey on their implementation by ENSREG NROs was conducted in late 2018 by the ENSREG Working Group on Improving Transparency Arrangements. The purpose of this survey was to build up an overall picture of how the 2011 principles are being applied.

The survey was administered through the SurveyMonkey platform and circulated through the ENSREG Secretariat to all ENSREG members in June 2018. The questionnaire included in total 41 questions. These questions were based on the 2011 principles (see Appendix 1). The survey remained open for completion until April 2019 with 21 full responses received, plus two partial responses. The responses came from a mix of nuclear and non-nuclear countries' NROs (see Appendix 2).

Survey Findings

The results from the survey are summarised in this report, organised by principle (2011 version). The detailed results are given in Appendix 3.

Develop a Communications Strategy: Most (80%) of NROs have developed an overall communications strategy, with just over half having published their strategy. Fewer (60%) develop regular communications plans and none of the NROs that responded publish these plans.

Disclose information in a timely manner: Most NROs (80%) have either a target in legislation or have adopted a formal policy on timescales for disclosure of information. The length of time specified is typically less than 1-2 weeks.

For communications during an emergency, 95% of the NROs that responded have prepared plans for the communication aspects of emergency response and all have some arrangement in place for 24/7 communication response in case of an emergency.

Develop an accessible web site: All NROs have developed a website and most have adopted at least one means to make the information on the website accessible to the public and other stakeholders (see table below). All responding NROs publish regulatory guidelines/legislation on their website, with 73% publishing regulatory decisions on their website.

Produce an annual report: Most (90%) of the responding NROs publish an annual report. And 95% of these publish it on their website. However, fewer (less than half) proactively distribute it to stakeholders.

When developing documents, consider in advance which information might be sensitive: In response to the question on whether an explanation or guidance is given on need to remove or withhold certain sensitive information, just over 60% provide information on this.

Proactively engage with stakeholders: Most NROs (81%) have identified their key stakeholder groups but fewer regularly engage with these groups. And when it comes to how the NROs engage, the tendency is to use email, the website and direct briefings/meetings; social media are not widely used yet.

Proactively build relationships with the media: Again, most NROs have identified the key media contact groups and 67% are providing the media with regular updates. However, media engagement events are only regularly organised by a few (14%) of them.

For media engagement, social media is more widely used. Twitter and Facebook were the two main social media channels mentioned by NROs.

Promote a culture of openness and transparency within the NRO: Organisation values or expected behaviours have been defined by 85% of NROs and 90% of these include reference to openness and transparency.

Produce information in plain language that is easy to understand: The survey showed that 80% of the responding NROs consider use of plain language for at least those documents aimed at a public/lay audience. A mix of methods is used to ensure the use of plain language (see Table below). Only 10% of NROs have extended this practice to include formal certification of their documents for plain language.

With regard to meeting the needs of different groups, with different needs in terms of technical detail, two thirds of NROs address this through preparing a non-technical summary for a lay audience. One third prepare a separate non-technical version of reports.

Measure the effectiveness of openness and transparency: Measurement of the effectiveness of openness and transparency through surveys of staff and external stakeholders has been done (or planned) in just 50% of the NROs which responded.

Conclusions

From the survey results the ENSREG Working Group on Improving Transparency Arrangements drew the following conclusions:

- The NROs seem to share a common understanding about the importance of the openness and transparency of their activities and its contribution to the continuous improvement of nuclear safety. This is reflected in the general implementation of the ENSREG principles and the levels of effort put into accommodating the public's desire to be well informed.
- However, there is still room for regulators to be more proactive, as compared to reactive, in engaging with the media and other stakeholders (including the public).
- The use of online communication (with emphasis on social media) could be increased for public engagement– this will become particularly important for engagement of younger/wider stakeholder groups. It was noted that social media is more widely used for engaging with the media.
- The balance between open and transparent communication and the need to protect security/sensitive information is still an emerging area which could benefit from more focus.
- While the majority of the principles have generally been adopted by NROs in their communication practices, the principle of measuring the effectiveness of activities in this area was not being applied by most regulators.

In the survey responses, it was noted that the principles should be implemented following a graded approach and take into account the financial and staff resourcing of each NRO, as well as the facilities regulated by them.

Next steps

Based on this survey ENSREG has updated the “Guidance on Openness and Transparency for European Nuclear Safety Regulators”.

The new guidance is now published on the ENSREG website:

http://www.ensreg.eu/sites/default/files/attachments/guidance_for_regulators_on_openness_and_transparency.pdf

Appendix 1: ENSREG Principles for Openness and Transparency (2011)

Develop a Communications Strategy which sets out clearly the organisation's commitment to open communication and the way in which transparency will be implemented, taking account of the principles set out in this document. Underpin the communications strategy with regular plans detailing the activities that the NRO will undertake to ensure effective communications with all those that are interested in or affected by what the NRO does.

Disclose information in a timely manner: Some national legislation may require specific timescales for specific types of information, but generally a 4 week timescale is deemed to be good practice. In the event of an incident or event, communicate quickly to avoid an information vacuum developing or rumour and speculation taking over in the media where news is a 24-hour a day fast paced business.

Develop an accessible web site for the general public and for specific stakeholders where they can find in-depth and understandable information on all aspects of the NRO's work and, in particular, on regulatory decisions and opinions. The website should, for example, include access to live monitoring data, to all relevant guidelines and legislation, to information on specific events and incidents, to research and other reports and to press releases. It should also support interactive consultations with stakeholders and incorporate a facility to gain feedback from visitors to the site.

Produce an annual report on the NRO's activities which seeks to demonstrate key achievements during the previous year. The annual report should be developed in a way that makes it easy for those reading it to see if the organisation has achieved what it set out to at the beginning of the year.

When developing documents, consider in advance which information might be sensitive, and organise the contents so as to ensure that the public version contains as much useful information as possible. For pre-existing documents being made public, delete only those parts of the *document* where commercial, national defence, public safety, security, proprietary, privacy issues or other restrictions within the framework of national legislation apply. This promotes a high degree of transparency.

Proactively engage with stakeholders who are interested in or affected by the work of the NRO using traditional and emerging means and seek to build on and enhance the stakeholder engagement or consultation activities that are required by law. Establishing relationships in a more informal manner helps to promote a more trusting environment.

Proactively build relationships with the media and become the point of reference for the media for neutral, objective information on nuclear safety issues. Doing this will help to establish the NRO as a credible source of information and will ensure that there is regular interaction in addition to when an event or incident has occurred. Eurobarometer surveys have shown that, in most countries, the media is the main source of information for the public on nuclear matters

Promote a culture of openness and transparency within the NRO so that all staff understand the importance of being transparent and of proactive engagement with all stakeholders. Embed openness and transparency into the organisation's values and behaviours.

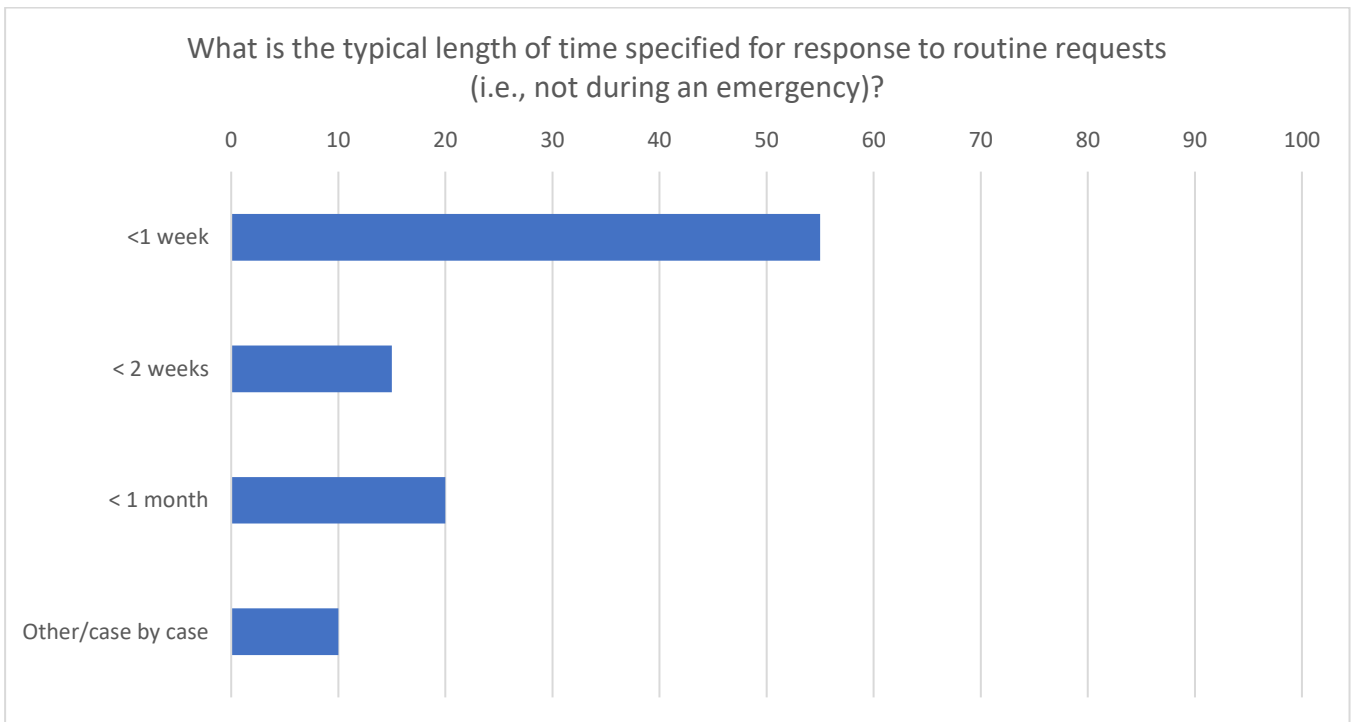
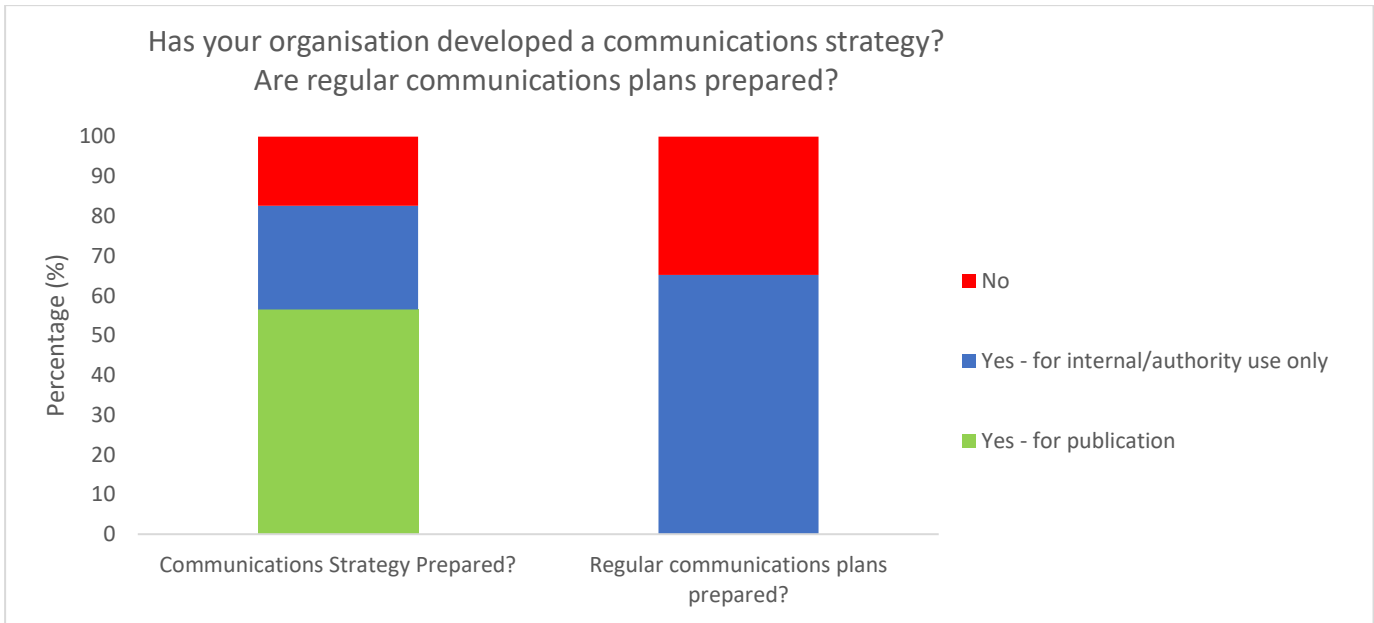
Produce information in plain language that is easy to understand. The information may need to be adapted for different target audiences. For example, some audiences will require more technical and complex information. (the KISS principle: Keep It Simple but not Stupid). Provide translated information where deemed necessary.

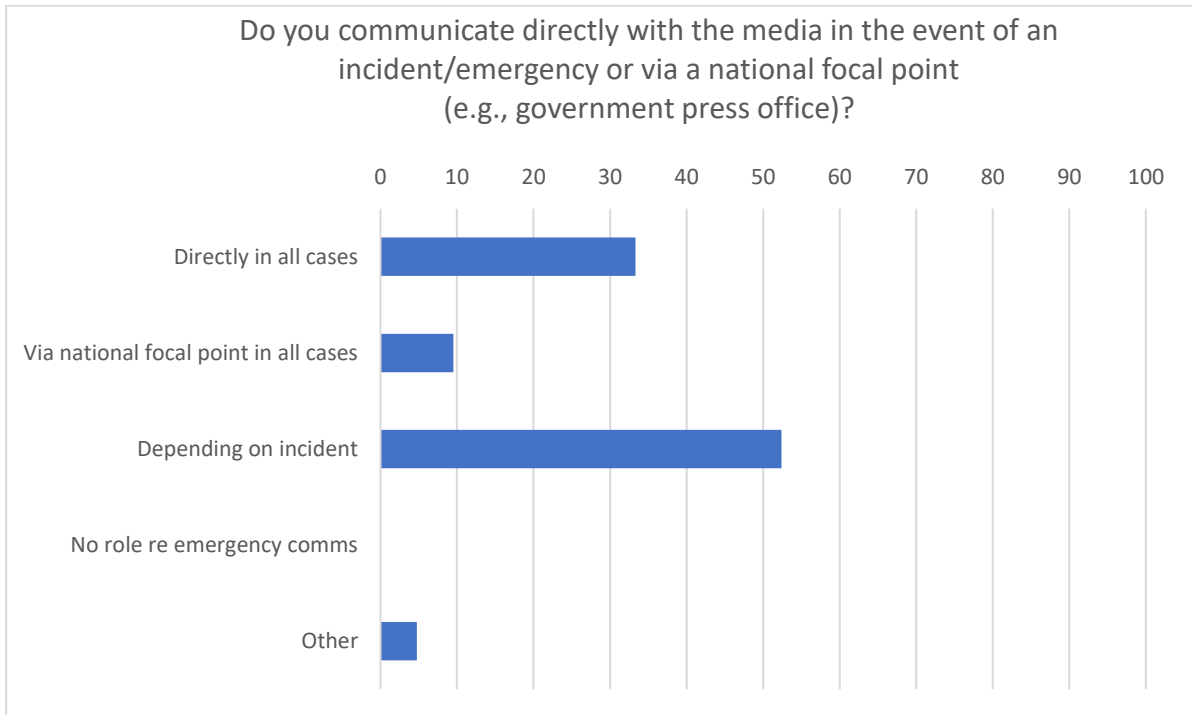
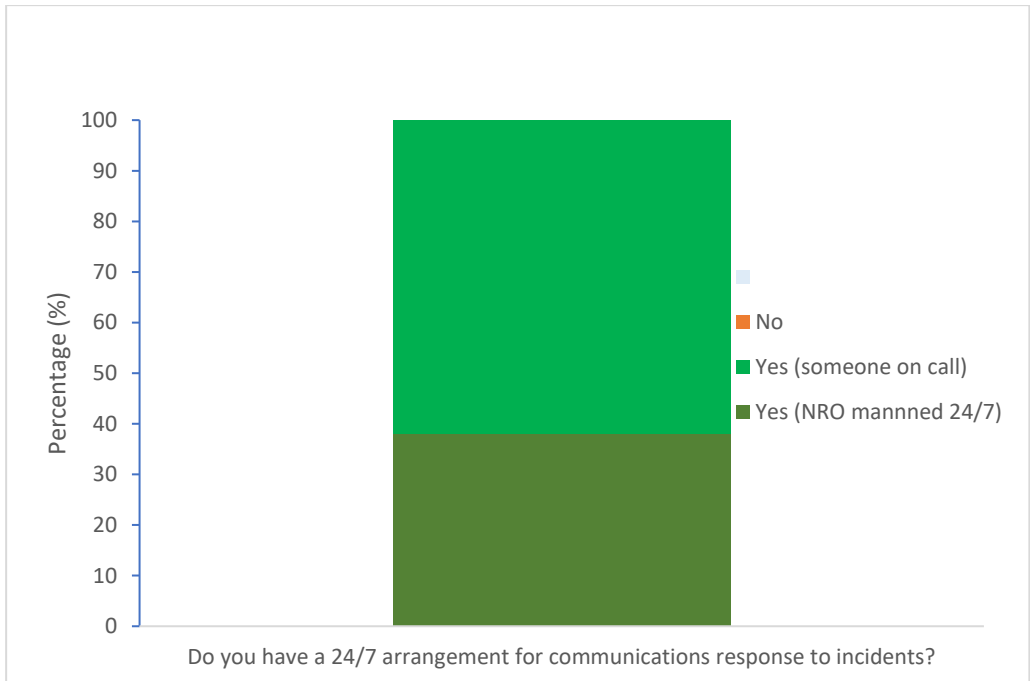
Measure the effectiveness of openness and transparency with a stakeholder and staff survey at least every two years. Share the results of the survey and develop an action plan for improvements.

Appendix 2: List of responding organisations

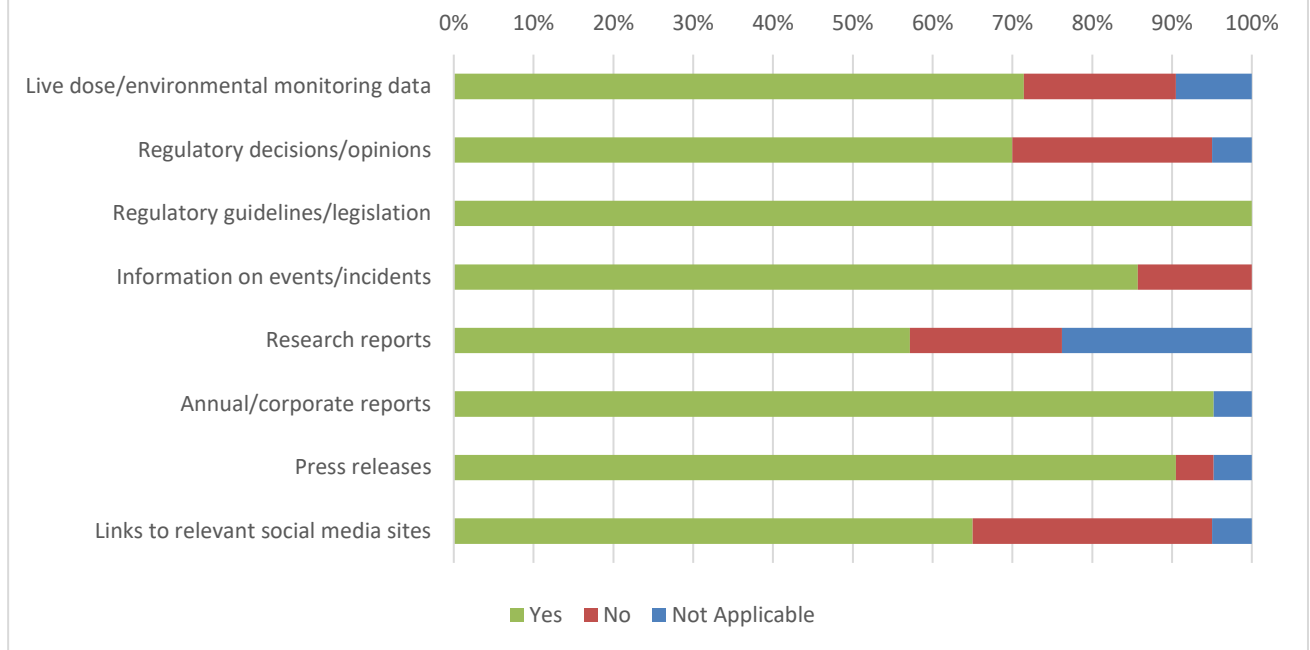
Swedish Radiation Safety Authority	Sweden
Autorité de sûreté nucléaire (ASN)	France
Ministère de la Santé: Division de la radioprotection (DRP)	Luxembourg
Federal Agency for Nuclear Control	Belgium
Environmental Protection Agency	Ireland
Radiation Safety Centre of State Environmental Service	Latvia
Office for Nuclear Regulation (ONR)	UK
Spanish Nuclear Safety Council	Spain
National Atomic Energy Agency of Poland	Poland
Radiation Protection Board	Malta
State Nuclear Power Safety Inspectorate (VATESI)	Lithuania
Greek Atomic Energy Commission (EEAE)	Greece
State Office for Radiological and Nuclear Safety	Croatia
ANVS Authority Nuclear Safety and Radiation Protection	The Netherlands
Nuclear Regulatory Authority of Slovak Republic	Slovak Republic
Hungarian Atomic Energy Authority	Hungary
Danish Emergency Management Agency (Beredskabsstyrelsen)	Denmark
Federal Ministry for Sustainability and Tourism	Austria
Radiation Inspection and Control Service	Cyprus
Radiation and Nuclear Safety Authority (STUK)	Finland
National Commission for Nuclear Activities Control	Romania
Slovenian Nuclear Safety Administration	Slovenia
Federal Ministry for Environment, Nature Conservation and Nuclear Safety (BMU)	Germany

Appendix 3: Results from the survey

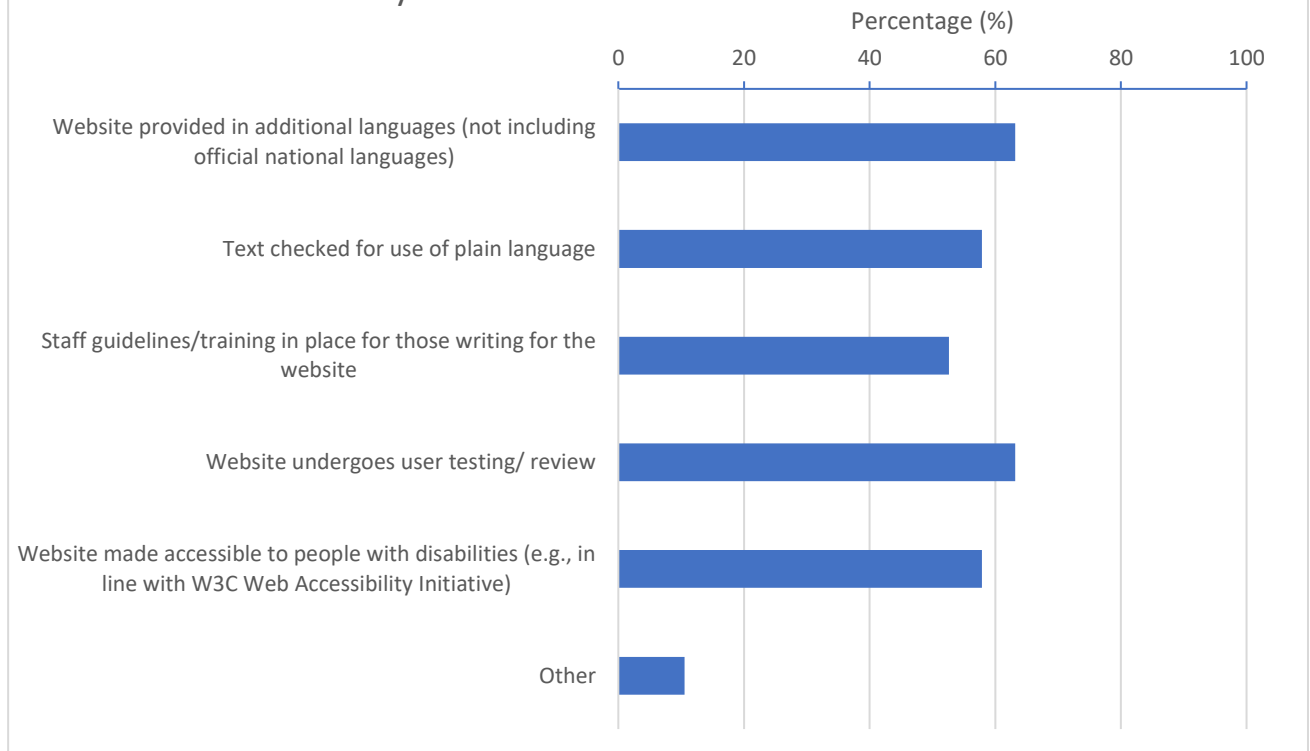


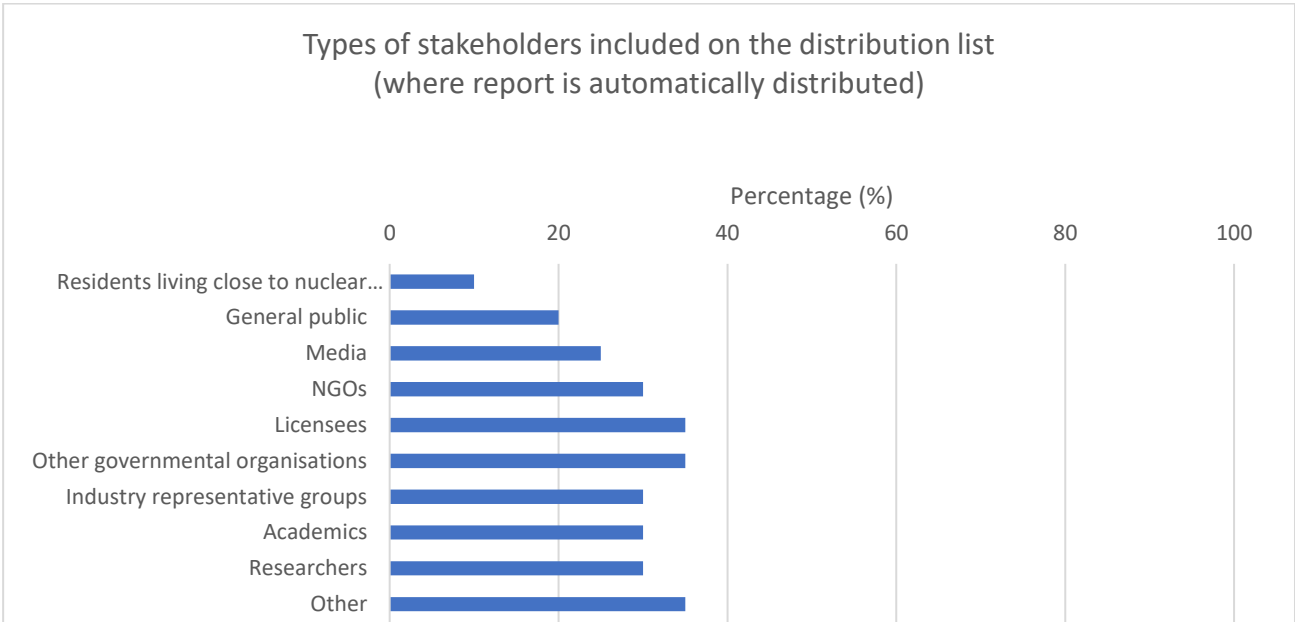
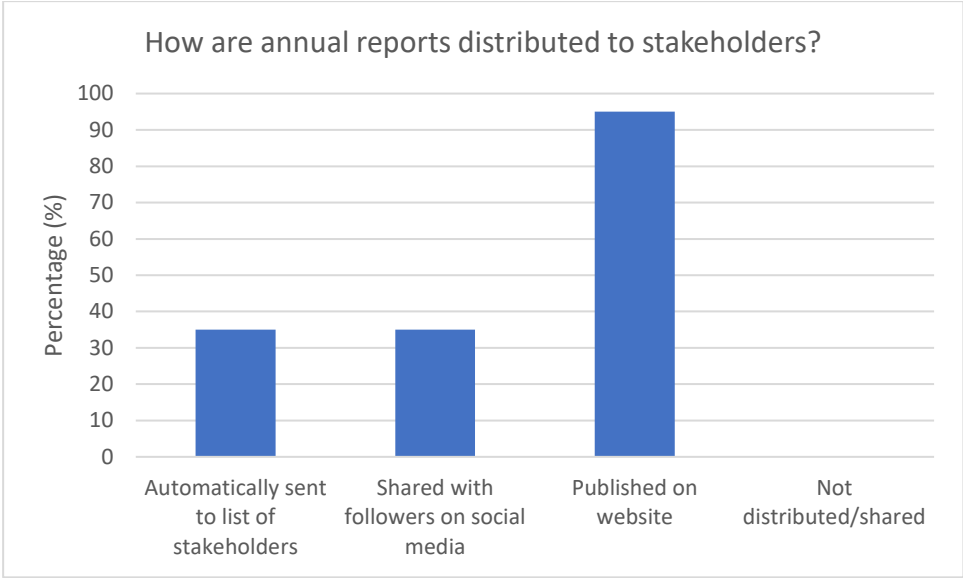


What type of information is provided on the website?



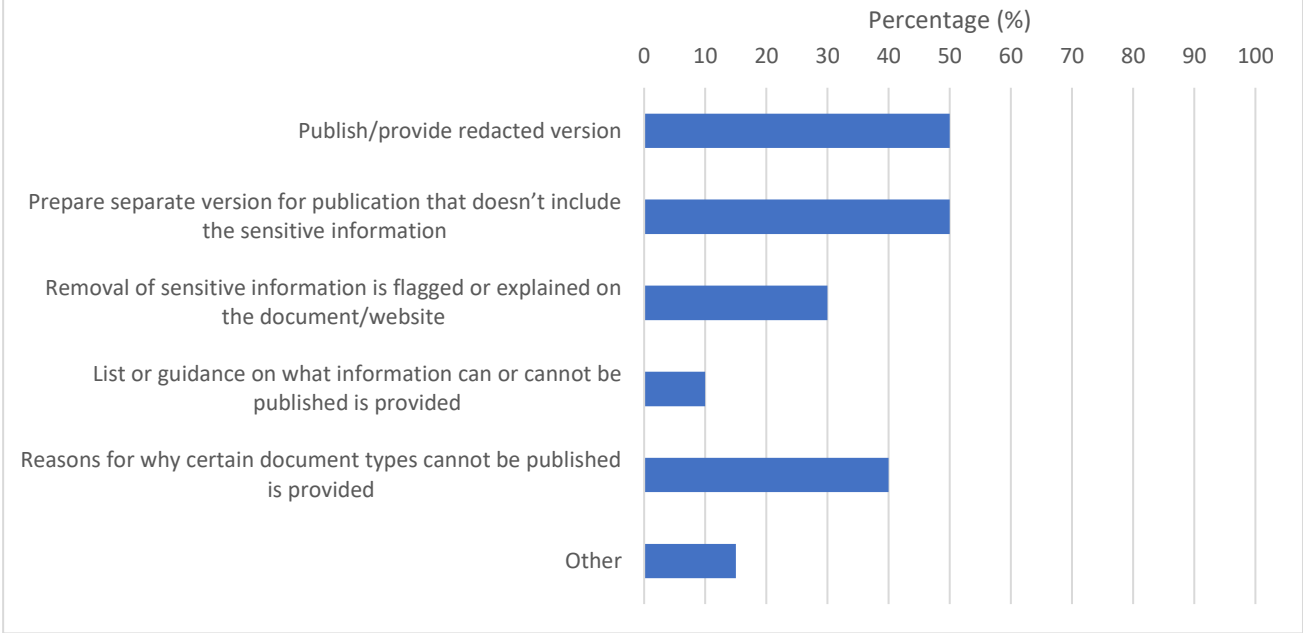
How is accessibility of the information on the website ensured?



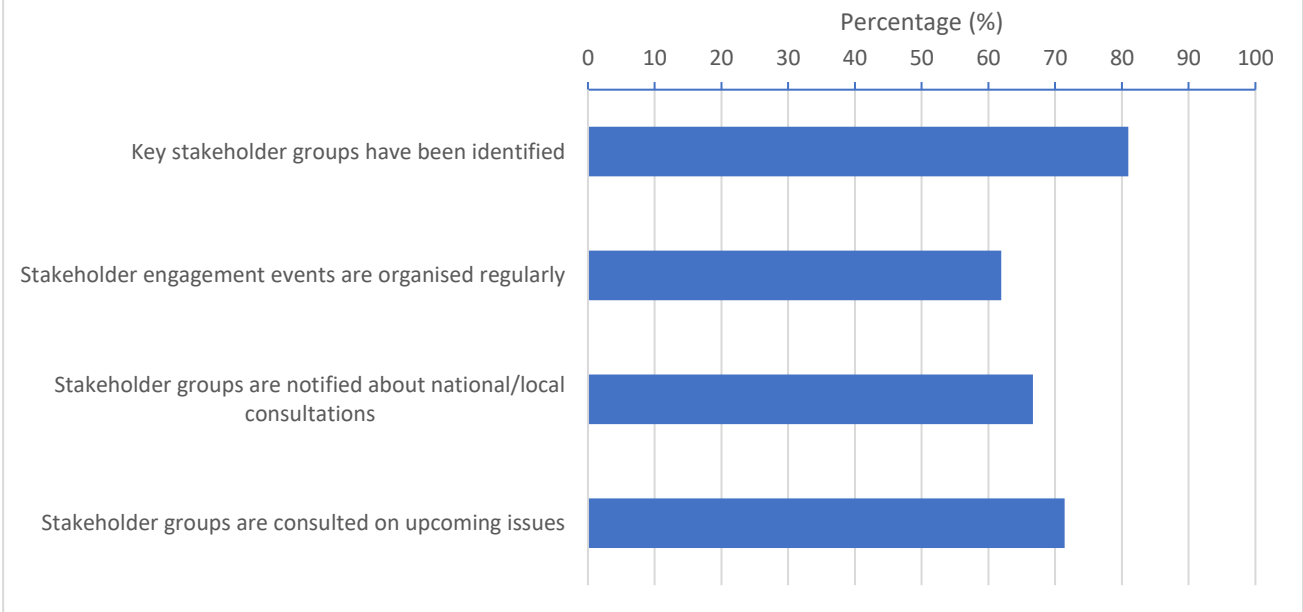


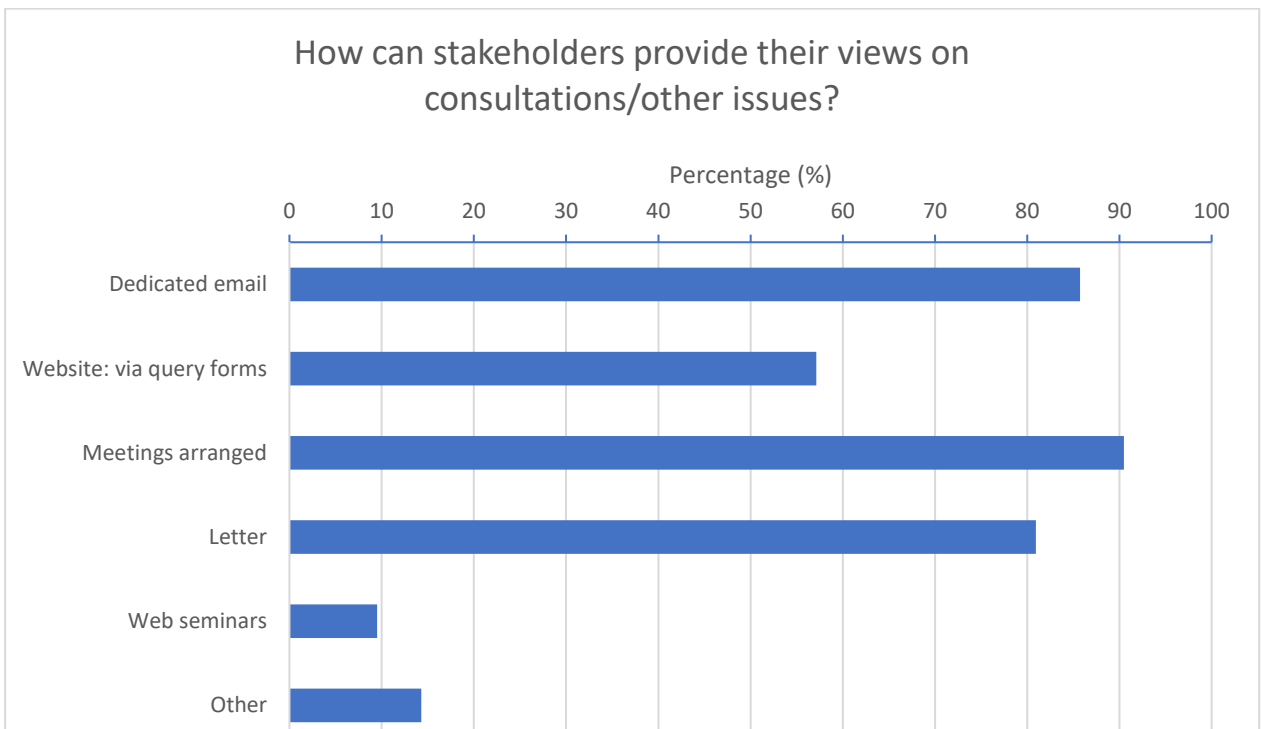
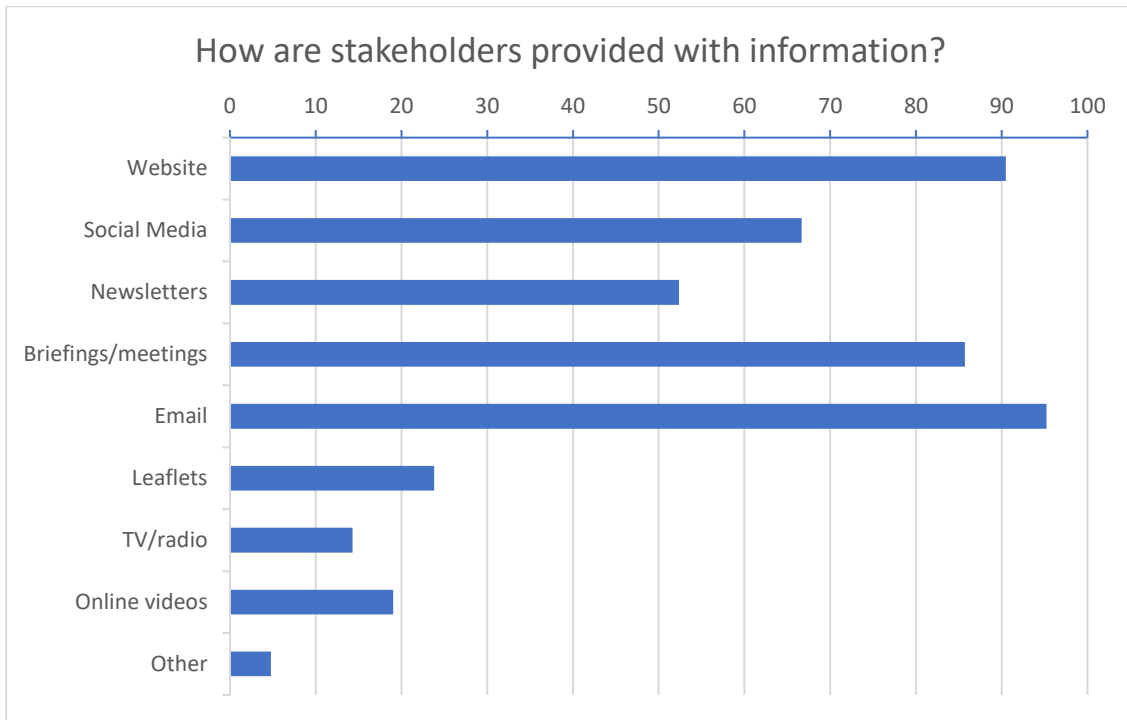
*Other includes Local information committees around facilities, other regulators and Parliament/politicians

How is the publication of documents containing sensitive information handled?



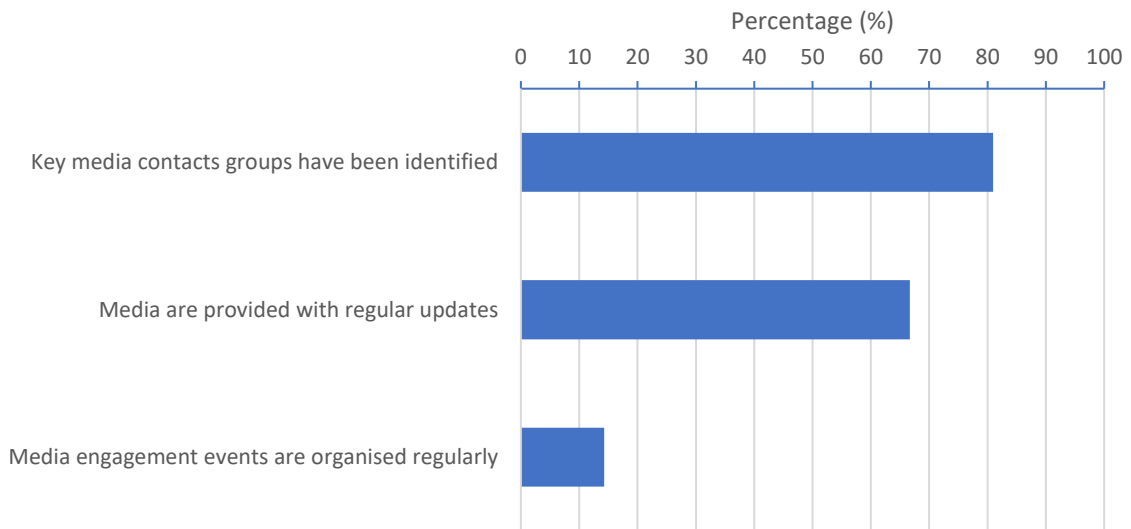
Engagement with stakeholders



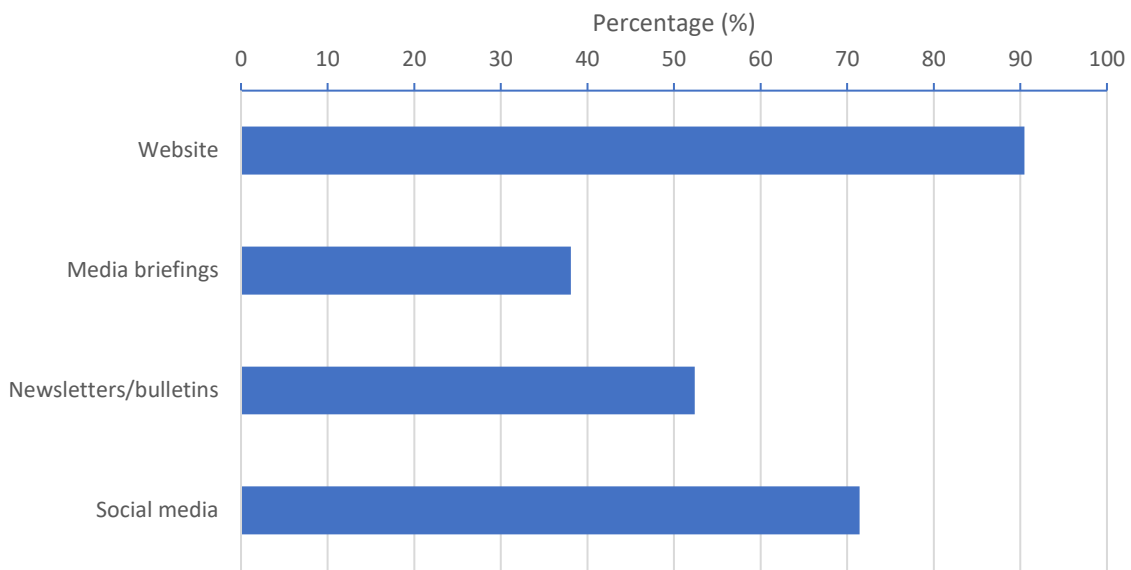


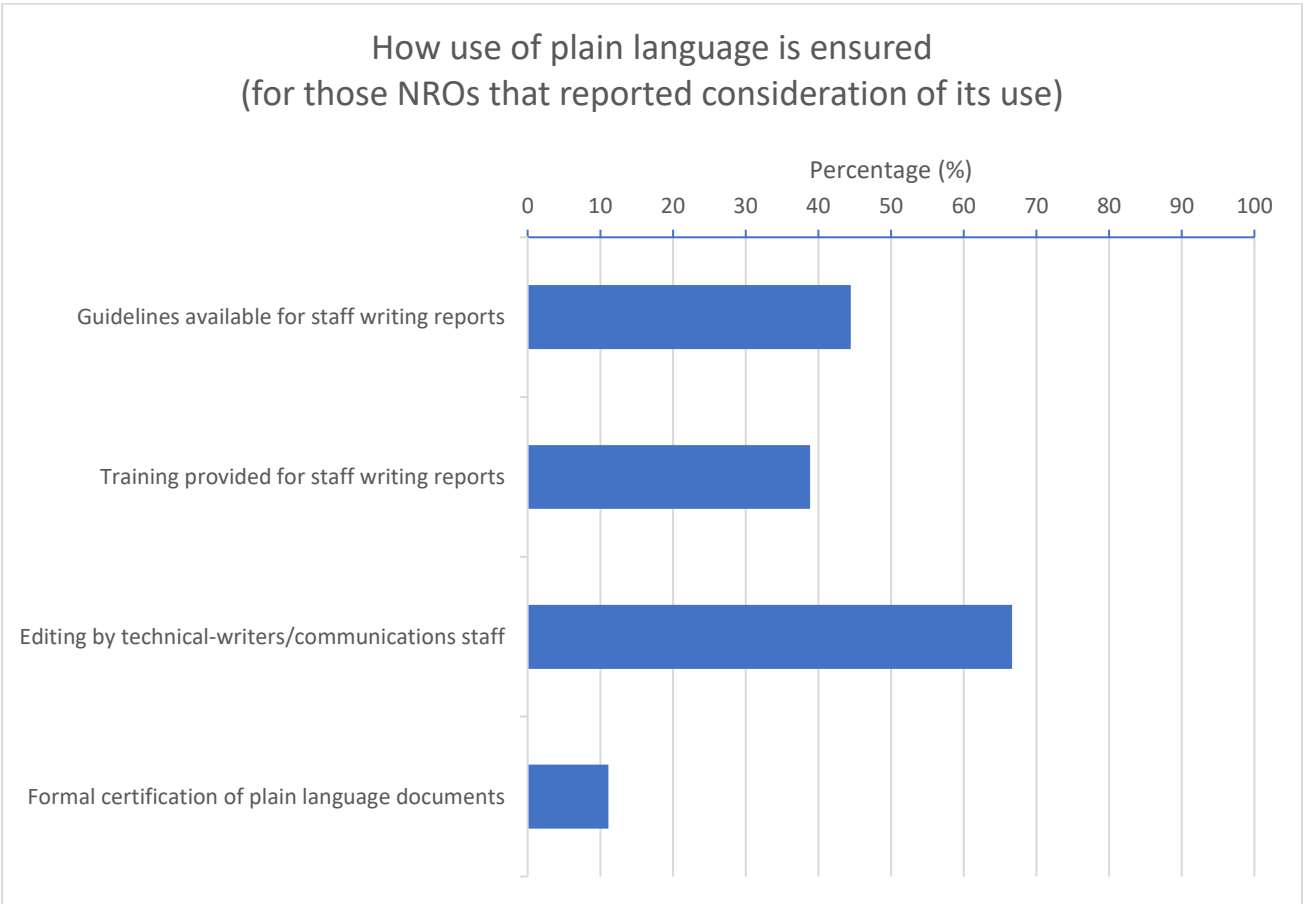
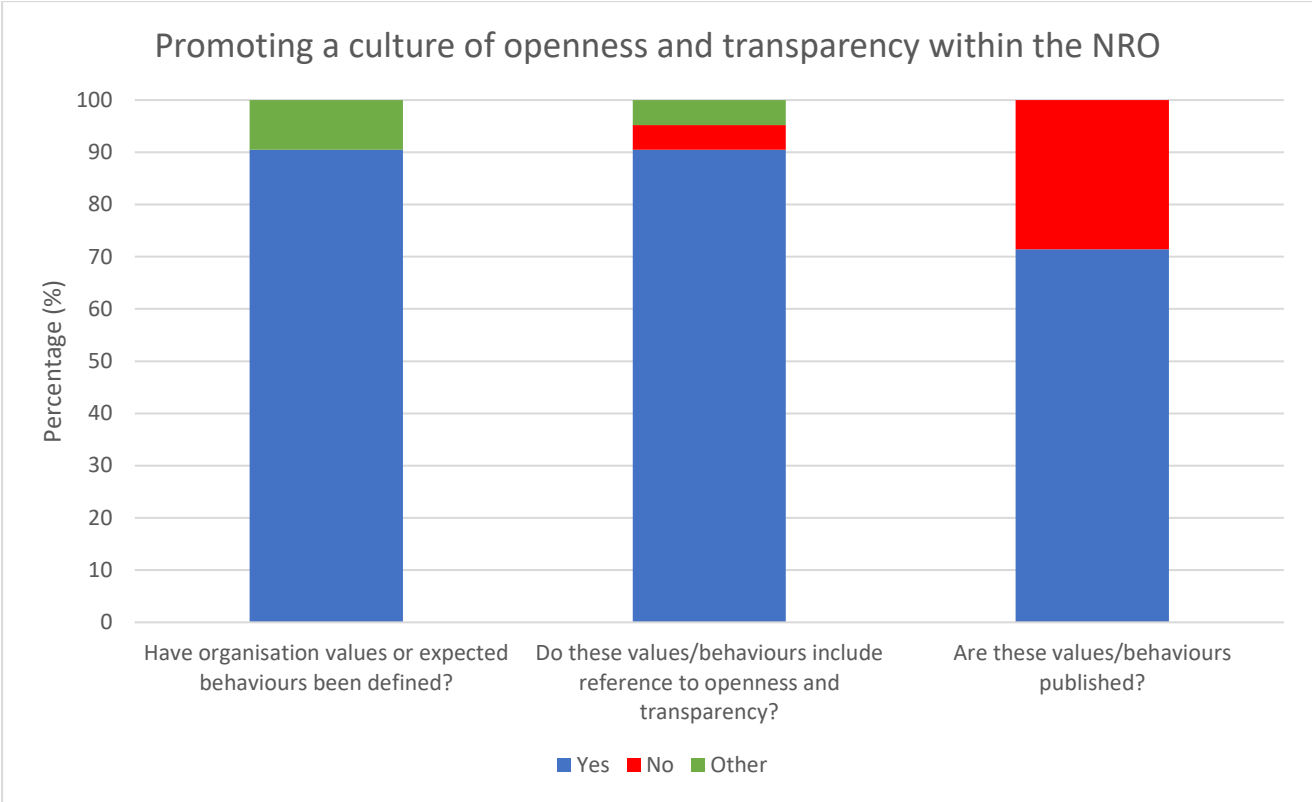
*Other includes inclusion of stakeholders in advisory committees and undertaking regular opinion surveys

How NROs build relationships with the media



Means used to engage with media day-to-day





Surveys carried out to assess views of stakeholders/culture of NRO staff regarding openness and transparency

