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Nuclear Decommissioning Authority

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Our ref: JP/LET/AUG10.05
Your ref:

Dear NSG Participant

The Future of National Stakeholder Engagement

The NDA has today published a summary of the study undertaken by The Environment Council (TEC) into the future of national stakeholder engagement. I would like to take this opportunity to thank everyone who took part and TEC for what is a very thorough study. There is more detail on the different points of view raised during the study published in appendices. To view the material, please click on the link to our website below.

http://www.nda.gov.uk/consultations/details.cfm?customel_datapageid_28748=39372

The NDA is now considering the report and we will publish our preferred approach early in September in advance of the National Stakeholder Group meeting.

As most of you will know, we have been under considerable pressure to reduce expenditure with our communications and stakeholder engagement budget targeted by a Cabinet Office imposed freeze for the rest of this financial year across all central government departments and NDPBs such as the NDA.

We have made a strong case for the NSG to go ahead and have been partly successful in that we have gained approval for the event to proceed although we have had to significantly reduce the costs involved. This means that we will be managing and hosting the NSG ourselves with no input from TEC.

This will mean some changes to the usual format but I'm sure you will agree that it is better for the event to go ahead than for it to be cancelled at short notice.

I look forward to seeing you in Manchester.

Yours sincerely

Jon Phillips

Jon Phillips
Director of Communications & Stakeholder Relations

The Environment Council

NDA National Engagement Review - August 2010

Summary Report

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1. Executive Summary

The Nuclear Decommissioning Authority (NDA) has commissioned this Review of its national engagement to reflect on its work with stakeholders and consider whether or not the current arrangements remain "fit for purpose". This reflection comes at a time when the NDA has accomplished its groundwork under its first Strategy. Its focus has now changed from the establishment of the structures that will achieve its mission, to that of delivery and performance. Strategy II will guide this next phase. The NDA's current Organisational Effectiveness Review (OER) will determine the focus and resource for this delivery.

This Review focuses on the principle of 'fitness for purpose'. This means ensuring that future engagement arrangements are tailored so that they continue to meet the evolving needs of the NDA and stakeholders.

This report provides independent recommendations to optimise current arrangements so that engagement is securely underpinned by the principle of fitness for purpose. This means that best practice engagement will be utilised so that not only is it tailored and flexible to match purpose and needs, but it will also prioritise and make best use of both the Authority and stakeholders' resources, to provide best value for all. The 'optimisation' of engagement, by definition means 'to plan or carry out with maximum efficiency'[1]. This approach therefore also recognises and makes provision for potential resource constraints within the present economic context. Even in the time that this Review has been conducted, the question of affordability has become more acute. The report addresses these constraints by recommending flexible and scalable solutions, leaving the NDA with a framework that can be implemented as it best sees fit.

The Environment Council (TEC) as an engagement specialist and current NDA National Convenor, has been tasked with undertaking the independent review of the NDA's national engagement. It has drawn on a range of sources to inform the Review, a key element of which has been that of stakeholder and NDA views. The Recommendations set out in this Review are therefore specifically developed from TEC's research into NDA and stakeholder needs. TEC presents this report to the NDA for its consideration and decision on the way forward for the Authority's national engagement.

The findings of the Review established that the NDA is doing much that is positive and constructively received in terms of national engagement. Developing a more flexible approach for the future will enhance this and bring further benefits. In reflecting on the findings of the Review, TEC proposes that national engagement moving forward should address not only what engagement mechanisms are required to deliver these needs but also focus on what else needs to be enhanced within the NDA to make engagement meaningful and effective; and in particular establishing the purpose of the Authority's engagement.

[1] http://dictionary.reference.com/browse/optimisation

TEC therefore sets out five Recommendations on areas for continued or future focus by the NDA to fully address the needs identified through this Review and ensure its engagement going forward is fit for purpose and value for money:

1. Clarity of NDA Remit and therefore Purpose of Engagement
2. Optimise Engagement Through A Strategic Approach
3. Ensure that Engagement is Fit for Purpose & Flexible
4. Build an Engagement Culture
5. Demonstrate Accountability

These are built into our Recommended Option for engagement. This option combines various engagement components or mechanisms in a way which is flexible, fit for purpose and tailored to stakeholder and NDA needs. However before any engagement can take place there are three supporting processes, described as 'Critical Enablers', which are required to make future engagement successful.

The Critical Enablers encompass the key elements of Leadership, Capacity Building and Communication. These involve the following processes:

- Proactive Executive support for evolving effective and robust engagement
- Enhancing the capabilities and ways of working of NDA staff to engage, ensuring engagement is driven by purpose and priorities and supported by the adoption of a subject mapping approach
- Evaluation of and learning from engagement; and demonstrating its impact
- Centralised, accessible and widely shared information about what is being engaged upon, why engagement is taking place, who is being engaged with, and how, which includes the outputs from these engagements and what key messages the NDA are taking from them.

The diagram below illustrates TEC's Recommended Option.

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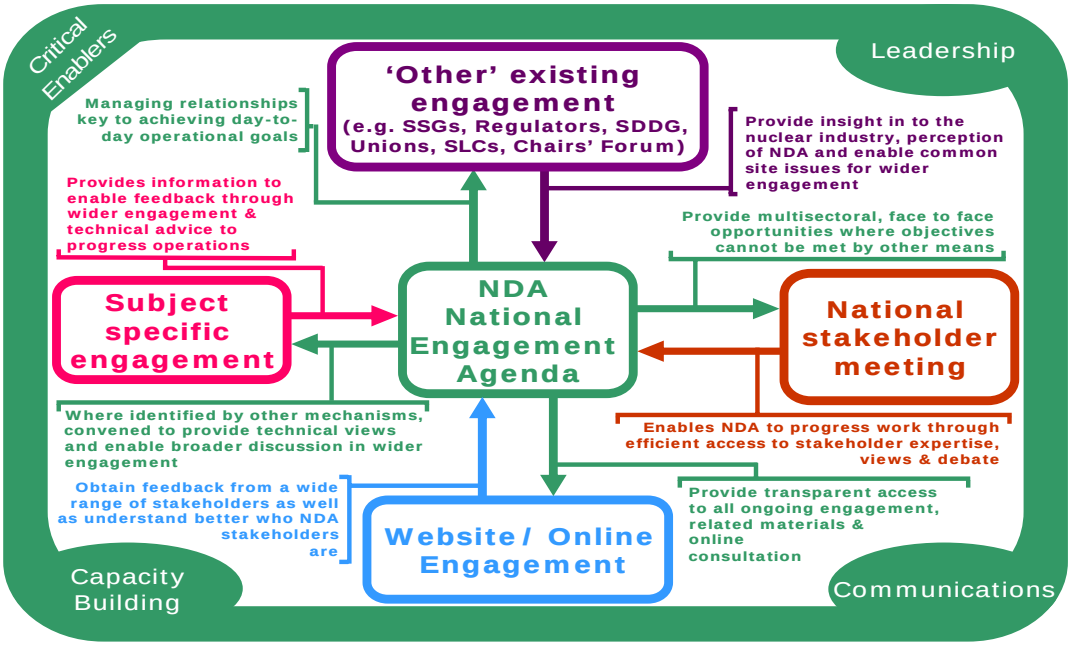

The diagram shows **NDA National Engagement Agenda** as the central element of the option. This encompasses the Recommendations that engender a proactive approach to planning engagement, ensuring that it is coordinated and coherent and driven by purpose and priorities. It would be defined by the adoption of a subject mapping approach and represents the planning that the NDA will have to firstly undertake to identify what national engagement requirements are for a given period. This involves establishing what subjects need to be included and who needs to be engaged; which would be undertaken prior to determining, which of the engagement components would be used to deliver them.

The following components would be part of a suite of mechanisms which interact and are intended to work as a package. These would be drawn upon to deliver the various requirements of national engagement according to which best meet the need and the resources available. The engagement components are:

Subject Specific Engagement. This would be engagement upon single specific and significant subjects, which require more in-depth discussion.

National Stakeholder Meeting. This would meet a specific requirement for a national strategic discussion and provide the key features of a large scale multiple-party, face to face meeting.

Website / Online Engagement. This could be used for cases that do not require in-depth engagement, for instance, where the opportunity for stakeholder influence is quite limited. The website could also be used for highly technical questions in instances where these would not require cross-dialogue.

The **Other Existing Engagement** covers the range of other existing standing groups and bi-lateral interactions that also provide engagement opportunities.

In presenting this report, TEC urges that these components are not seized upon as the key aspect of importance within the Review or the key outcome from it. The Recommendations of this report are essential to inform and provide a context for their use and the Critical Enablers that underpin them are vital elements that provide them with essential support. We strongly recommend that all readers of this report give close attention to the further exposition of the Recommendations in the following sections and to their importance in ensuring robust arrangements for national engagement going forward.

2. Methodology

The NDA has commissioned this Review because it wanted to:

- Reflect on more than five years of experience from working with stakeholders
- Consider whether or not the current arrangements remain "fit for purpose"
- Review its expenditure on national engagement activities in the same way that it is looking at all other expenditure.

As the NDA's National Convenor, TEC has been asked to conduct the Review and make recommendations. We are focusing both on good practice principles and the mechanisms of engagement. Please see Appendix 1: The Environment Council, for more information on our charity and the principles of authentic engagement we apply to our work.

Aim

To establish the needs of both the NDA (see Appendix 2 for an acronyms table) and its stakeholders, examining existing mechanisms to see if they are meeting these needs and make recommendations to the NDA for future engagement

Method

The Review was carried out in a number of stages between April and August 2010, as set out in the following section, 'Timeline'. TEC has sought the views of a range of national stakeholders and NDA staff. The Engagement Review involved:

- Stakeholder interviews
- Online questionnaire
- Desk research on other relevant mechanisms and practices
- A Stakeholder Review Meeting

Timeline

- April/May 2010 - Carry out stakeholder analysis. Conduct stakeholder interviews, questionnaires and desk research
- June 2010 - Analyse data and information collected, develop draft recommendations
- July 2010 - Hold stakeholder review meeting. Refine recommendations, produce report and submit recommendations to NDA

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- July-September 2010 - NDA internal decision-making period. NDA announce chosen recommended way forward (See Appendix 3: Engagement Review Process for diagram)[2].

Outputs

This Summary Report constitutes the main output from TEC's review of the NDA's national engagement. It is supported by an 'Online Questionnaire and Telephone Interview Response Analysis' (providing a breakdown of the data gathered), desk research covering international examples of nuclear engagement and examples of engagement from other sectors, selection criteria to support those we invited for interview and to participate in the national stakeholder engagement review meeting and the Stakeholder Engagement Review Meeting report. Views gathered from stakeholders at NSG10 on their needs and what they would like to have from national engagement formed a starting point for our analysis[3].

To inform the NDA National Engagement Review, data was gathered via online questionnaires and telephone interviews. Individuals identified were assigned to one of three categories (please see the selection criteria document for details of how individuals were assigned[4]). These categories were:

- NDA staff
- Engaged stakeholders (those the NDA engages nationally)
- Non-engaged stakeholders (those not engaged by the NDA).

Those participating in the review via online questionnaires all completed the same set of questions, which were designed to elicit information from each of the identified stakeholder groups. Those participating in telephone interviews responded to one of three sets of interview questions depending on which of the above stakeholder group they came from, to gain more in-depth insight from a given stakeholder's experience. A framework for analysis was designed and responses from both data-gathering processes were ordered into this framework. Response data was then grouped and assimilated, with graphical representation used where possible. A full description of the method used can be found in the 'Online Questionnaire and Telephone Interview Response Analysis' document[5].

This Summary Report has been through peer review processes and TEC's early thinking was shared with a Stakeholder Review Group for their feedback and views.

In reviewing the findings and developing the Recommendations TEC has adopted an 'optimisation' approach. It should be noted that 'optimisation' for the NDA may not be a deluxe model of engagement, but will seek to be the best possible approach within affordability.
This means that best practice engagement will be utilised so that it is tailored and flexible to match both needs and constraints, and will

[2] This document is available at (NDA website).
[3] These materials can all be found at *(NDA website)*.
[4] This document is available at (NDA website)
[5] This document is available at (NDA website)

prioritise and make best use of both the Authority and stakeholders' resources, to provide best value for all. This approach therefore also recognises and makes provision for potential financial limitations within the present economic context and the NDA's operation and engagement in context of the NDA's Organisational Effectiveness Review and wider Government restrictions on spending in this area.

We have focussed on developing the optimal approach to engagement for the NDA now and in future in terms of:

- Statutory requirements
- NDA planning and decision making, in line with its remit
- Stakeholder needs
- Financial constraints/ affordability

Mirroring the NDA's own approach to strategic planning, we have identified a series of Critical Enablers that support the success of our Recommendations. Critical Enablers are crucial aspects to the NDA's work which must be supported in order to ensure that effective engagement occurs. The function of the Recommendations as set out in this report is to outline some specific, targeted and bespoke guidance for the NDA, founded on their own needs, stakeholder needs and TEC's engagement experience, that will act as a reference for the direction of its evolving engagement.

Terminology

Throughout this and accompanying documents related to the Review the terms 'stakeholder' and 'engagement' are used frequently. For the purposes of this work we have assumed that a stakeholder is any person, group, or organisation who affects or can be affected by the NDA's actions.

This Review did not examine the NDA's public engagement at a community level, rather community representatives (from the Site Stakeholder Groups) were invited to feed into the review process as stakeholders. With reference to the term 'engagement', we have applied this in the broadest sense to understand the full range of the NDA's engagement activities and consider them in the context of national engagement. As such, engagement represented any interaction between the NDA and any external agent, from a telephone call to NSG meetings.

Timescale

This Review is set in the context of a 5-year period elapsing since the inception of the NDA and the time of the NDA strategy review. We see our findings and Recommendations, as presented in this report, being relevant and requiring implementation also across a 5 year period as a maximum horizon. Our expectations are that a 3 year period would be the point at which a further round of reflections on the engagement arrangements might start to be considered, in line with the preparations for Strategy III. Any sudden or profound changes to the Authority would also be a trigger for such a review to take place.

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3. Current Engagement Methods

The Energy Act 2004 established the NDA as an organisation with a duty to engage and consult with stakeholders on all aspects of its work. Engagement has been formalised by the NDA in the Stakeholder Charter[6] NDA does not only engage stakeholders, but also communities and the general public via multiple mechanisms. These engagement channels can be grouped into different categories: face to face (workshops and meetings), electronic (email, website, online consultation), paper communication (Insight Magazine, letters) and phone.

Face to face engagement is delivered through workshops and meetings at a national and local level. National level events include: NSG meetings, Government Governance meeting, Partnering events with Parent Body Organisations (PBOs), policy meetings, Strategy Development & Delivery Group (SDDG), Supply Chain fora and workshops, Trade Union Forum, MPs briefings. Local level events include: Local SSG meetings, SLC performance review meetings, SSG Chairs' Forum.

Electronic engagement is undertaken via emails, allowing recipients to access and interact with information in their own time, with time to reflect on information and prepare thorough, measured responses and feedback information. The NDA website is used to keep stakeholders, communities and the general public up to date with NDA activities and to provide information and reports, with web alert emails issued to a number of stakeholders for signposting new information. Online consultation has also been used by the NDA.

Paper communication is done via the 'Insight' newsletter, which aims to give a brief taste of ongoing activities around NDA's 19 sites as well as an insight into how NDA operates. Stakeholders are also formally informed via letter when it is necessary.

Phone Communication is carried out by the NDA with stakeholders, on an ad hoc basis. Stakeholders who wish to contact the NDA are directed via the website to either switchboard or general enquiries lines. Alternatively they can contact named Communications staff for Press Enquiries.

4. Review Findings

A great deal of data and points of view emerged from the various sources that we analysed, some of it contradictory. The following is intended to provide headline findings from the Review. Note that these are stakeholder and NDA staff views, not those of TEC.
See Appendix 3: Summary Review Findings for more details.

[6] http://www.nda.gov.uk/documents/loader.cfm?url=/commonspot/security/getfile.cfm&pageid=3366)

Headlines: 'Who Should The NDA Be Engaging?'

- Linked to the question of 'who to engage', comments were made on the **mechanisms to engage different audiences.** Engaging different groups may be better achieved if the emphasis was not on one big event.
- An important feature of national engagement was identified as involving a **wide range of stakeholders**, and value was placed on sharing views from different perspectives.
- The need to **involve more NGOs** was identified. It was observed that NGOs' interest in what the NDA are doing differs to that of other stakeholders.
- **Various other stakeholders** that interviewees would like to see more involved were mentioned. It was observed that it would be beneficial to reanalyse who needs to be involved to help deliver the NDA's future activities in line with the NDA's direction under Strategy II.
- The need to **benchmark against/ get input from others** was identified as a clear message. Particularly looking at international nuclear decommissioning case studies and benchmarking against other sectors, such as oil and gas.
- It was suggested that the **media** could be involved to give NDA national engagement exposure but this was not a universally shared view.
- Comments on **what should be expected from stakeholders** included suggestions to review the current list of those involved and to provide clearer guidance on what stakeholders are expected to contribute.

Headlines: 'What NDA Engagement Should Be?'

- Identifying the right level of engagement (project, local or national) is a common thread throughout the Review, with both the benefits and limitations of tackling local issues at a national level raised.
- In order to identify what engagement should be; interviewees were asked to think about successes and limitations of current national engagement practices. **Successes** included responses on:
    - Attitudes
    - Ways of working
    - Roles
    - Outputs
    - Outcomes

  Limitations included responses on:
    - Perceptions
    - Audience
    - Reporting mechanisms
    - Expectations management
    - Engagement topics
- Suggestions were made for the improvement of engagement. These included responses on:
    - Follow engagement good practices
    - Adopt new national meeting format and location
    - Allow access to senior representatives
    - Deliver efficiency and costs savings
    - Demonstrate professionalism

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- Cover a wider range of topics
- Make better use of online resources
- Communicate more widely
- Develop benchmark
- Clarify remit of engagement
- Adopt a more localised approach to engagement
- Maintain trust

Headlines: 'Why Should Engagement Happen?'

- Interviewees **valued different perspectives**, with NDA talking about the benefits of engagement more from an organisational and relationships perspective and stakeholders talking about the benefits from an awareness perspective.
- Key views on the **purpose** of NDA engagement included: provide information to stakeholders & inform strategy through stakeholder feedback; ensure stakeholders are wrapped into NDA's activities; route for any emerging stakeholder issues that arise; building and maintaining trust and relationships between stakeholders and NDA; maintaining the Authority's accountability
- **Engagement on local issues within a national context** was identified as important by both NDA and stakeholders, as national engagement allows local people to share their experiences at a strategic level.
- **Engagement in the context of the current economic crisis** was identified as important. From a stakeholder perspective, there is a compelling need to ensure all government spending is efficient, and from NDA perspective it offers opportunities to discuss and explain the priorities and consequences of spending decisions.

Headlines: 'How The NDA Might Engage In The Future?'

- How **frequently** stakeholders thought the NDA should involve them in national engagement ranged from monthly to once a year. Suggestions were made to develop a strategic decision calendar approach from NDA in conjunction with stakeholders, so they might have maximum impact.
- NDA would like to see **clarity from stakeholders on their issues of interest and importance.** There were views that NDA and stakeholders should discuss what should be engaged on and agree a programme for this engagement as well as appropriate mechanisms for this.
- Stakeholders wished to see **NDA identify what it needs to engage on and why** as well as identifying what it wants to get out of engagement.
- Suggestions to develop **stakeholder mapping** as a first step to decide appropriate engagement mechanisms for each stakeholder group.
- Views were that 'one size fits all' engagement is less useful than **appropriate / fit for purpose methods of engagement.**
- Feedback indicated people would like to see more **efficient face to face meetings**.
- Ensure **appropriate communication** in terms of language, level of technical information & timeliness.

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- Ensure **appropriate resources** are deployed (e.g. staff time to keep web pages up to date, should aim to achieve best value for money).
- Stakeholders wish to see **NDA provide feedback mechanisms/ reporting**.
- Ensure **appropriate level of engagement** for the issue being discussed.
- People want engagement that is **responsive and flexible** and able to engage upon emerging issues.

Given this wealth of information, findings from stakeholders and our research, it would be tempting to immediately move to discussion of engagement mechanisms and the 'how' of NDA's work with stakeholders. This would be to miss the very crucial prerequisite of determining the purpose of NDA engagement. Hence the following section sets out our Recommendations on how the NDA can best achieve a strategic fit for purpose approach to its engagement.

5. Recommendations for an NDA Engagement Strategy

The following Recommendations are based on the data gathered from stakeholders and other sources through the review[7]. TEC has analysed this data and applied its experience and expertise of multi-stakeholder engagement to form the following Recommendations. There are five headline Recommendations that are supported by more specific sections within them.

5.1 Recommendation 1: Clarity of NDA Remit and therefore Purpose of Engagement

The purpose of stakeholder engagement for the NDA needs to be considered within the overall framework of the organisation's remit. NDA needs to begin with:

- Its statutory obligations for engagement. This is the baseline from which it needs to start
- Its remit, both according to the Energy Act and as defined in Strategy II
- Context of the Organisational Effectiveness Review and what resources are available for engagement.

5.1.1 NDA redefines and articulates its role and remit.

There are two key activities that will have a direct impact on how the NDA clarifies its remit going forward. These are Strategy II and the OER. NDA will need to consistently reiterate its role and remit in line with the

[7] Desk based research on international engagement, NSG 10 report, Evaluation forms from NSG 10 and previous NSGs, 2007 engagement review, stakeholder interviews and online questionnaires, NDA communication team, National stakeholder engagement review meeting report.

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outcomes of these activities. It will need to re-examine its capabilities as a result of the OER.

For instance, stakeholders need affirmation on NDA's approach to the following potential tensions:

- Strategic overview and implementation: If the emphasis is changing so that more activity is happening around implementation, then there may be more of a requirement for engagement on this. This then begs the question of who else needs to be involved, for example what other stakeholders are affected if the focus is on implementation. In addition, a change of emphasis could also raise the question of who might take responsibility for engaging and whether this is by Parent Body Organisation or Site Licence Company rather than at strategic level and how that might be managed appropriately.
- Existing and future resource constraints: Resource constraints can affect stakeholders in two ways: Firstly this can impact on possibilities for decommissioning which reduces 'what is up for grabs' in terms of stakeholder influence. The NDA needs to share these limitations with stakeholders and look at how to plan engagement accordingly, so that where there is most opportunity for stakeholders to give feedback, there is also the most opportunity to influence. Secondly, resources also affect how much NDA is able to achieve via engagement, so there is a need to prioritise engagement and to share the rationale for prioritisation with stakeholders. The NDA needs to ensure that it articulates the limitations in both of these cases.
- National versus local concerns: The NDA faces a tension in that it is a national strategic body with responsibility for the UK's nuclear legacy, which is sited locally. Hence it needs to maintain stakeholders' confidence that it will proactively identify and establish what these differing concerns or needs are, affirm its role in addressing them, and continue to provide clear communication on its approach. Adopting a partnership approach to local engagement (e.g. delivering local engagement primarily through SLCs and PBOs) may be the most strategic way of addressing this tension, as there is a link to the above question of implementation.
- Balancing the different needs of stakeholders: The NDA needs to demonstrate how it has understood what these needs are (see section 5.2.4. which refers to optimising partnership working); its approach to balancing them and, where there are any priorities that the NDA has to consider, there needs to a clear communication to stakeholders about what these are and how they will be applied. TEC's proposal to adopt a subject mapping approach, (see section 5.3.1) will facilitate this.

5.1.2 Define the purpose of engagement for the NDA.

Flowing directly from the clarity of the NDA's role and remit is the purpose of its engagement. The purpose of engagement puts parameters around what is 'up for grabs' in NDA dialogue and helps to ensure that engagement is strategic, targeted and makes optimal use of both NDA and stakeholder resource.

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NDA needs to do this, both for its own planning and also to communicate it to stakeholders. It is useful to consider the 'purpose' of engagement in terms of the concepts of: information giving or gathering; engagement (where a decision can be influenced by stakeholder input); and, consultation (where NDA has a preferred approach and is seeking feedback on it). This means that that the NDA, as the decision-maker, sets out the following elements:

- Where there is an opportunity to provide information about the NDA's activities, progress or outputs and therefore where there may be very little or no opportunity for stakeholders to influence.
- Where there is some opportunity to gather feedback on the NDA's activity and outputs as a process of checking and refining its work through stakeholder input and therefore where there may be opportunity or statutory obligation to consult
- Where there is there is a particular or significant opportunity and priority for influence on the NDA's activity or developing work and therefore where some more in-depth engagement may be needed

Given the current economic context, and as part of good practice, NDA will need to identify and prioritise those areas of its work where there is most need or most value to be gained from engagement.
It is important that this purpose is defined corporately and has buy-in throughout the organisation and from the top.
Also, crucially, purpose needs to be defined for every individual engagement that is embarked upon.

5.2 Recommendation 2: Optimise Engagement Through a Strategic Approach

Optimising engagement can be achieved by ensuring that activities are coordinated and consistent, and relate to one another in a strategic way. This means that the NDA can aim to make as effective a use as possible of some of the other potential means and mechanisms to engagement that currently exist beyond the current national arrangements.

The NDA should consider:

- Ensuring that information and outcomes of engagement flow through to other engagement components (for instance website can support face-to-face subject engagements, which may feed into and report back to a national meeting etc).
- Mapping the existing 'other' engagement that the NDA is already undertaking, to rationalise it and optimise it.
- Making better use of existing meetings and selected conferences for NDA staff to engage with stakeholders.
- Examining the opportunity to make linkages with engagement activity going on internationally.
- The opportunity to convene a commercially sponsored conference to bring together those with an interest in networking & sharing information on decommissioning.

- The opportunity to play an oversight or coordination role for engagement, as a strategic authority on nuclear issues.

5.2.1 Leading coordination of strategic engagement on nuclear decommissioning

In support of NDA maintaining a strategic approach to its own engagement, the Authority could opt to take a wider leading role in this regard, and play a coordination role for engagement, as a strategic authority on nuclear issues. The NDA is well placed to play this strategic role and could add value to its own engagement activities as well as those of others.

To achieve this, we suggest that the NDA could use its website to map a forward calendar of its engagement. This calendar could be used as a basis by other organisations needing to engage on nuclear decommissioning, to have a shared and strategic understanding of what else is taking place and when, and to share information about their own activities in this context. By taking the lead in this way, resource efficiencies could be made and the NDA would benefit more directly from other engagement activities in fulfilling its own remit. (This is outlined further in section 5.2.4 below on optimising partnership working).

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5.2.4 Optimising partnership working

The NDA has good relationships with many diverse organisations and stakeholders, which it could use more strategically in terms of partnership working. One area where NDA could broaden its reach is abroad; as it not only has best practice to share and to learn from others, but it also has responsibility for the UK's nuclear legacy. Partnerships with UK academic organisations could be forged to ensure these opportunities are not missed whilst NDA's resource is best used.

There are numerous meetings and selected conferences where NDA staff are invited to attend, or speak and present their expertise. These represent an opportunity to engage with stakeholders, rather than simply partaking in information giving exercises. NDA staff should be given the mandate to use other organisations' engagement to build relationships with stakeholders and demonstrate the NDA as a transparent and open organisation.

The NSGs have served as a hub for other organisations' formal and informal meetings in the margins. For instance, DECC has presented, the EA & HSE have run fringe meetings, while other organisations use it as an opportunity to be available to stakeholders. One suggestion is that NDA could convene a commercially sponsored conference, (see Section 7 and further Appendix 6: Engagement Components for further detail) to bring together those with an interest in networking and sharing information on decommissioning. This could have the purpose of strengthening relationships in the sector as well as a hub of information exchange.

5.3 Recommendation 3: Ensure that Engagement is Fit for Purpose & Flexible

To ensure that the NDA's future engagement remains fit for purpose, a tailored and flexible approach, appropriate for the purpose and needs, should be taken forward. To achieve this, NDA should do the following, in line with its capabilities within the OER:

- Adopt a subject mapping approach to understand what, with whom, when and how engagement should happen
- Consider and provide clarity on how much of their decision-making is able to be influenced (as set out earlier in section 5.1.2 on defining purpose).
- Affirm stakeholders' role in relation to NDA decision-making and NDA's expectations of stakeholders (see section 6.2 on Capacity Building for further details)
- Enhance the NDA website and use it differently
- Prioritise the most significant engagement within resource limitations, and communicate this clearly.

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5.3.1 Adopting a subject mapping approach

The NDA currently has a statutory obligation to engage upon its annual Business Plan, which sets out the year's forward work. From this plan, it should be clear which areas of NDA's work will be progressing, which will require decisions or changes, and which will therefore require engagement in the coming year. Those NDA Leads responsible for areas requiring engagement will be able to proactively determine:

- The purpose of engagement on their subject
- 'What is up for grabs' (i.e. how much of the decision can be influenced by stakeholders, again considering information giving or gathering/ engagement and consultation)
- When this decision needs to be informed by stakeholder views
- Who the stakeholders are, that need to be involved.

These questions will help to inform thinking about the scale and type of engagement required, and consequently NDA can make decisions about the resource necessary, in the context of what resource is available, to engage well on different subjects.

When several subjects are mapped in this way, the organisation needs to identify which stakeholder groups need to be engaged, across which subjects. In approaching these groups for engagement the NDA should take the opportunity to clarify their expectations of stakeholders. For instance are they seeking technical expertise or input from a community perspective? It can also be a relatively simple task to log stakeholders' stated areas of interest via a web registration page (see section 5.3.2 below).

Considering engagement in this way will inform NDA's prioritisation of engagement, ensuring that the issues most requiring stakeholder input can be prioritised.

5.3.2 Enhancing the NDA website and using it differently

A well structured and functioning website can be an excellent tool for information giving and potentially for capturing feedback also. Stakeholders consistently suggested that they would like to see the NDA website become more accessible, with information more clearly sign-posted and easier to find. Improvements to navigability and filtering would enhance this mechanism as a gateway to the organisation. [8]

The website can be used as a tool to signpost stakeholders on a number of issues: what the NDA is doing, upcoming events, how and when to engage, the outcomes of recent engagements, recent reports and updates. It is currently used for some of these functions.

Additionally, it needs to be used in the future to support and link with face to face engagement. Integrating these components will enhance engagement overall, and provide accessibility and transparency for those not present at face to face meetings as described earlier in section 5.2.3.

[8] http://www.nda.gov.uk/stakeholders/

There is an opportunity to make the website more interactive and to use it to gather feedback, views and potentially even to elicit topics of discussion or comments in an open forum style from the public. For subjects where there is little able to be influenced by stakeholders, the website could be a resource effective method for engaging. It can also very simply register the issues that stakeholders wish to be kept informed of, or indeed engaged upon.

All of these functions and any enhancement of the website will require significant resource and the NDA will need to take a decision as to the strategic value of the website as an engagement tool. Our recommendation is to focus on the improvements that will make it more accessible as an information giving tool and to integrate it with current other methods of engagement.

5.4 Recommendation 4: Build an Engagement Culture

The NDA has spent considerable resource on engagement and building relationships with stakeholders over the last five years. In order to sustain the benefits of these efforts into the future, the NDA should continue its focus on the following:

- Face to face access to the NDA Executive for stakeholders.
- Formation and maintenance of relationships between the NDA and stakeholders.
- Enable a cross-sectoral exchange of views.
- Giving attention to the role of trust in relationships with stakeholders.
- Buy-in and demonstration of commitment to engagement from the very top of NDA
- Support for culture change within NDA, which flows into its engagement

5.4.1 Acknowledging what stakeholders articulate as needs from engagement.

There are some aspects of national face to face engagement that can not be replicated with other mechanisms. Our findings indicate that these include building trust, building relationships, the opportunity to meet with and hear the views of others, and accessing the senior executive. Stakeholders value these aspects of face to face engagement. The Recommended Option provides NDA with the framework and suite of tools to meet these various articulated needs. It is important to understand that to a great extent, meeting stakeholder needs for building trust and relationships helps to further the NDA's mission. It is a strategic body that relies upon partnerships to further its effectiveness. In the same way that the NDA seeks to optimise its assets, it should see the relationships it has with stakeholders as one of its greatest assets and seek to support this.

In addition to the above, the NDA should maintain and build on ways for stakeholders to set the agenda where appropriate. Currently stakeholders

can comment on draft agendas prior to events and are invited to submit agenda items prior to NSGs. In future this could be further improved by proactively understanding those subjects of greatest importance to stakeholders (see sections 2.3.1 and 5.3.2). In turn, stakeholder groups need to give NDA a more aligned and common view of their priority topics and issues for engagement. This would provide the NDA with a better starting point for meeting these needs.

5.4.2 Engendering an ethos of open, proactive engagement throughout the NDA

NDA staff should continue to be encouraged to proactively engage beyond their normal working relationships. This is especially vital where the consequence of an operational decision will have an impact, short or long-term, on stakeholders not party to that decision. From Executive downwards, the impact of the NDA's work should be considered from a stakeholder perspective.

To achieve optimum benefits from engagement, staff need to plan for and build engagement into their day job. This should be driven by an organisational move towards achieving the most efficient use of engagement possible and away from any perception in the organisation that engagement is a cumbersome necessity. The NDA needs at its heart to see engagement as a way to optimise the organisation's effectiveness, where new ideas can be developed and tested, saving time and resource in the long-run.

Promotion of inclusive, timely engagement is a core element of the Authority's operations. The NDA needs to ensure that this is in place and to better communicate the presence of this ethos to stakeholders.

5.5 Recommendation 5: Demonstrate Accountability

To optimise engagement, build relationships and effectively fulfil its remit, the NDA needs to demonstrate accountability. This Review has found that stakeholders trust staff as individuals, but that trust in the NDA as a whole does not necessarily follow on from this.

Accountability and accessibility build trust. In order to gain this for the organisation as a corporate entity, this needs to be demonstrated consistently from the highest levels within the NDA. This is supported by transparency and openness, as well as:

- Continuing to improve the use of evaluation throughout the organisation
- Reviewing stakeholder involvement to ensure the right people are involved to inform decisions. This includes endeavouring to make NGO engagement more robust.

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5.5.1 Improve use of evaluation throughout the organisation

There needs to be an improved understanding of how both NDA staff and stakeholders understand and use the information they gain through engagement.

NDA staff expressed the need to know how stakeholders understand and make sense of the information provided, as well as how they relay it to their constituent groups. Conversely, stakeholders need to better understand how NDA use their feedback and what impact it has on decision-making as so far it has been difficult to demonstrate this.
Both of these aspects can be supported by evaluation, following on from any engagement.

Both NDA and stakeholders should have an agreement or 'contract' to feed back about how input has informed decision making (from the NDA) and how information has been understood and relayed to constituent groups (from stakeholders). Evaluation can ensure that these practices or mechanisms are working and can collect valuable data to address these questions. NDA staff need to be supported on how to effectively evaluate their engagement, in order to ensure that these above described 'feedback loops' are in place.

5.5.2 Review Stakeholder Involvement

Just as there is a need for subject mapping of the 'what', there is also a need for stakeholder mapping of the 'who'. It is important to ensure that the fit for purpose approach to national stakeholder involvement also covers who needs to be involved. Again, this exercise will be set in context of the purpose and needs defined by Strategy II, and the new boundaries of the OER.

Engagement needs to be reflected on broadly at regularly instituted review points. The NDA needs to maintain a good understanding of how different sectors are represented, which organisations in these are engaging, and also who is not and why, as part of its engagement practice.

In particular, involvement must be considered, as outlined earlier in section 5.3.1, when conducting subject mapping in terms of which stakeholders need to be involved in a particular engagement at a particular time.

There is also the more fundamental consideration of the purpose of NDA's engagement since this relates to how national stakeholders may be defined (as outlined within Recommendation 1). If there should be any change to the focus or purpose of the NDA in future, a re-examination of who the NDA's stakeholders are would also be required.

Additionally our findings indicate a specific need to develop the NDA's relationship with NGO engagement. Our research has found that due to competing priorities and limited resources for NGOs, participation in

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engagement on legacy nuclear issues is difficult. The subject mapping approach outlined in section 5.3.1 will help to proactively define for NGOs when the NDA would like their participation, and potentially help them to prioritise it. Furthermore, we recommend that extra work is done to establish dialogue with NGOs and understand their priorities and needs. We recommend that this be done from within the NDA via a series of structured phone calls. This data can then be used to inform the NDA's approach to engaging with NGOs more effectively.

6. Critical Enablers

Critical Enablers are crucial aspects of the NDA's work which must exist in order to support and ensure that effective engagement occurs. However the NDA chooses to implement the combination of Engagement Components proposed in Section 7, these will only deliver effective engagement if the factors set out in this section are also referenced, maintained and enhanced.

The Critical Enablers are as essential to enable the NDA to engage with its stakeholders as the provision of the mechanism or method for engagement, and provide a supportive function for this. They are the building blocks by which NDA can sustain and evolve its relationships with stakeholders; involve them in a way that is fit for purpose and ensure value is gained from engagement for both stakeholders and the NDA. The Engagement Components are a form to which the Critical Enablers give function.

The Critical Enablers are grouped under three headings: Leadership, Capacity Building and Communications and their detail is set out below.

6.1 Leadership

The role of NDA's Executive in supporting engagement cannot be underestimated. The ongoing development of the Authority's engagement should continue to be proactively supported by the Executive. Engagement needs to continue to be recognised as an opportunity that will add value and robustness to the Authority's work. Through leading by example, the Executive will continue to enhance this recognition and this culture throughout the organisation. In conjunction with this, by driving the Recommendations to optimise NDA's engagement set out in this report, the Executive will ensure that this understanding is matched by its benefits.

The NDA Executive needs to continue to give their backing to the processes that will support and embed good engagements such as the proactive approach to planning it, ensuring that it is coherent, driven by purpose and priorities, and demonstrating its impact or influence. These processes are further outlined under the section on Capacity Building, below.

The findings of the Review have reflected the great importance to stakeholders of access to the Executive. The presence of the Executive,

CEO and Chair at NSG meetings has been noted and much valued and appreciated by stakeholders. Personal contact greatly enhances the trust and understanding generated between stakeholders and the NDA. Stakeholders have a much more positive perception towards the Executive's accountability when this is allied to direct access them. As previously set out in section 5.4.1 above, it is important that stakeholders' articulated needs in this respect continue to be met and demonstrated at the highest levels. Stakeholders gave the unequivocal message that access to the Executive is of highest importance to them and should be maintained and extended if possible. The Recommended Option gives the NDA a variety of approaches to providing this access.

6.2 Capacity Building

There are a number of processes which should continue to be supported to enable the NDA's engagement to evolve. These, if enhanced, will provide more targeted and prioritised engagement which will optimise the resources of both the NDA and stakeholders, will make the engagement more robust, and demonstrate better practice.

There is a continued need for capacity building within the NDA. By this we mean a stronger engagement culture and enhancement of the present capabilities of the NDA teams to engage. The goal would be to give more NDA staff a better understanding of: the what, why, when, who and how they should engage; what constitutes good practice and genuine engagement and the appropriate application of engagement. This would enable staff to:

- Build their understanding into everyday thinking.
- Identify when engagement is going to be most meaningful, meet greatest needs and add greatest value.
- Understand what they can get from engagement for the NDA and that it is an opportunity to add robustness and value to their work.

Transparency, openness and accessibility can be built into NDA's ways of working more explicitly. Stakeholders would like to be able to pick up the phone if there is an issue they need to discuss and speak directly to the right NDA staff member concerned.

Any culture change within an organisation takes time to embed and building a stronger engagement culture and enhancing capabilities requires longer term timescales of build up and implementation.

To build staff capacity in an efficient and consistent way we propose the development of an internal guidance document which could accompany internal training or awareness raising, as done by the Environment Agency in their 'Working with Others' approach. The NDA needs to firstly consider what level of capability it needs and as a vastly smaller organisation to the EA such an approach would need to be proportionate to the Authority as an organisation.

The above approach will build greater understanding and expertise in delivering effective engagement. There is a separate issue of

independence and the NDA may want to explore greater in-house rather than independent delivery. The findings of our Review suggest that this should be carefully and thoroughly explored with stakeholders.

Capacity to participate in engagement also needs to be addressed for stakeholders. Reference is made under Recommendation 3 to the need to affirm stakeholders' role in relation to NDA decision-making and also NDA's expectations of stakeholders. Clarifying NDA's expectations of stakeholders includes aspects such as stakeholders' remit to represent a constituency directly, to come prepared, to have consulted with their own stakeholders first. This may also include the kind of expertise NDA expects or want them to bring (e.g. knowledge of the specific circumstances of their own communities).

Findings also point to a need to set out an expectation of how the NDA wants stakeholders to interact with one another to best inform the Authority. TEC has observed that for 'dissenting' voices, some stakeholders demonstrate a closing of ranks on the NDA's behalf against other external challenge; whereas the purpose and value of a multi stakeholder engagement is for the NDA to understanding the breadth of different perspectives. This enriches the dialogue and deepens understanding both for NDA and for other stakeholders.

The mechanism to achieve this are further outlined under the Communications section, below.

6.3 Communications

Effective communications will continue to have an essential role to play to enable coordination and common understanding of the engagement approach and processes being undertaken. The importance of identifying and communicating the purpose of each engagement can not be overstated. Again the simple framework of considering information giving and gathering, engagement and consultation as effective ways to communicate the purpose of engagement can be used.

As already set out in section 5.3.2 above, the website could be enhanced and used differently; emphasising its role as an active hub for the NDA's engagement and targeting its information giving capability differently. A simple annual calendar (covering upcoming events, how and when to engage, the outcomes of recent engagements, recent reports and updates) could flow from the forward planning process and serve as an excellent communication tool. The calendar would also be a way of helping to communicate what and how subjects for engagement are focused on and how they are prioritised; establishing which are the big issues and conversely which content areas are those where there is not much 'up for grabs' for the stakeholders.

Communication needs to highlight when and how the NDA is conducting good practice engagement, so that the Authority is not just doing this but also signposting it. One example of this would be a clear and consistent framework or location for the NDA to post its 'feedback loop' i.e. the

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information about how NDA has used stakeholder feedback and what impact it has on decision-making; so that stakeholders could be clear where this would be logged and could reference this to understand how stakeholder input has influenced the NDA. The presence of such a framework would also help to institute and strengthen the feedback loop as regular good practice in engagements for NDA staff.

7. Engagement Components

TEC has classified different types of engagement and describes them as Engagement Components. Applying these components in different ways builds a variety of options which are described in Section 8. See Appendix 6 for a detailed description of each component, as TEC suggests them. These components can also be interpreted and scaled by the NDA in its implementation of its Engagement Strategy.

It is intended that the 'components' below are modules of engagement that can be combined in different ways; building Options.
It should be noted that TEC considers that these should be elastic and flexible. For instance, in some Options one component may have a very dominant role, whilst in others it may be minimised.

Ultimately it will be the NDA's decision as to how it chooses to combine these components in a way that best meets its engagement needs. It should be noted however that these components are intended to operate as a package to meet the needs of national engagement as a whole.

In addition to more detail on the components set out in Appendix 6, please see section 8.2 below for more detailed description of how TEC recommends combining these components and what they entail.

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8. Options for Engagement

8.1 Discounted Options

There are a number of Options that we considered and discounted. These include:

X No Engagement

The NDA has a statutory obligation to engage as such, this option would not be feasible in the current regulatory framework.

X No Change

For the reasons outlined at NSG10 (to reflect on more than five years of experience from working with stakeholders; consider whether or not the current arrangements remain "fit for purpose"; and to review its expenditure on national engagement activities in the same way that it is looking at all other expenditure), NDA have outlined that current engagement must be optimised and must therefore change. As the findings of the Review have reflected there are difficulties and limitations inherent in reliance on one single mechanism for the delivery of national engagement

X All Online

There are many existing mechanisms of 'Other' engagement that will continue to happen face to face, hence all online engagement isn't feasible. Furthermore, stakeholders have expressed that it would not be satisfactory and at present, the NDA website is not of sufficient standard to support online engagement (as opposed to one-way information provision).

X NDA leading all UK engagement for nuclear

Whilst the NDA could potentially have a strategic overview role for engagement, it is not realistic that it would lead all engagement (including on new build) in the UK. It is not resourced and does not have the remit for this role.

? Baseline option

The NDA has a statutory obligation[9] to engage with its stakeholders as defined by the Energy Act 2004. This obligation defines the baseline requirement and can be summarised as:

- Public consultation on Environment report that encompasses Strategic Environmental Assessments of individual topic strategies (reviewed minimum every five years)
- Public consultation on NDA's Strategy (reviewed minimum every five years)
- Annual public consultation on three year Business Plan which sets out in detail what work the NDA plans to do in a given financial year, and for what expenditure.

During the first 5 years of existence the NDA has consistently delivered more than this baseline. It also has a Stakeholder Charter that commits the organisation to greater engagement. Stakeholders consequently are accustomed and expect NDA to do more than the statutory minimum.

TEC has not discounted this option entirely, as it is still the NDA's prerogative to choose to do a minimum. However, we strongly advise against adopting this approach. It would not meet the objective of optimising NDA's engagement to best deliver its remit and would not meet stakeholder expectations, nor be appropriate in the particular context and background of the nuclear scene.

8.2 Recommended Option

There are many different ways that the components described could be combined. The following option is TEC's Recommended Option, as it will meet the following engagement needs:

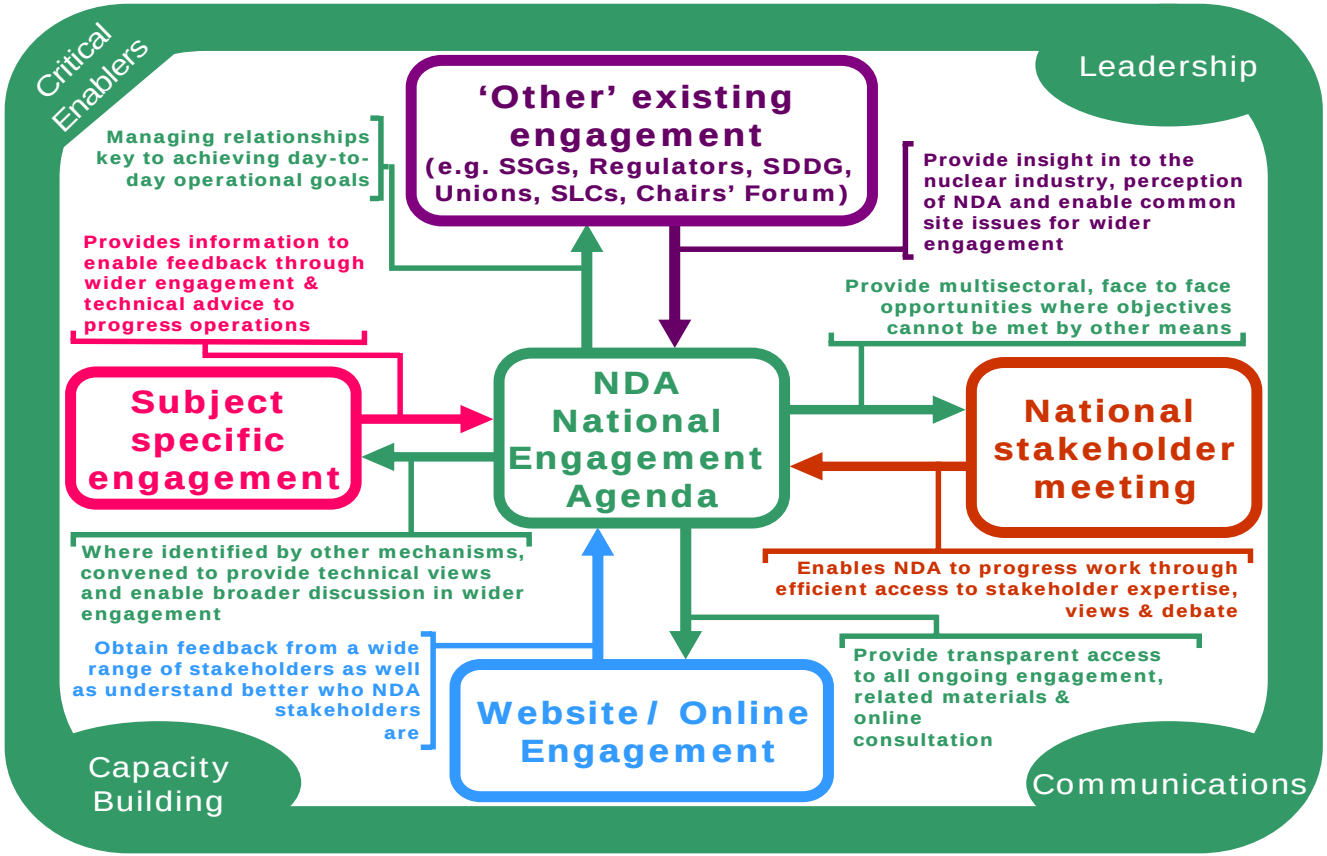
- It will enable the Authority to have engagement that is driven by purpose and priorities
- It will give the NDA the ability to understand where it needs to focus its engagement efforts and how it needs to target its engagement resources as a coherent whole.
- It will give the NDA the flexibility to access stakeholder input when it is most needed and to communicate information in the most effective, timely and appropriate format
- It will give the NDA the flexibility to access the stakeholders it most needs to reach, when it most needs to reach them.
- It will give the NDA the flexibility to target how it engages with stakeholders, enabling the most in-depth conversations to take place with stakeholders when they really count
- It will ensure stakeholders' time and resources are drawn on when they can most make a difference.
- It will enable the NDA to meet the key requirements of stakeholders to have access the NDA, and to build trust and relationships.
- This flexible approach will enable NDA's stakeholder engagement approach to adapt and evolve as the organisation changes thus ensuring that it remains 'Fit for Purpose'

[9] see http://www.nda.gov.uk/stakeholders/newsletter/doc-hierarchy.cfm

- This option will optimise the impact of the engagement to meet both the strategic needs and resource parameters of the organisation

The diagram below illustrates the Recommended Option.

Diagram: Recommended Engagement Option



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This diagram shows **NDA National Engagement Agenda** as the central element of the option. This represents the recommendations of this report to take a proactive approach to planning engagement, ensuring that it is coordinated, coherent and driven by purpose and priorities. It would be defined by the adoption of a subject mapping approach and encompasses the planning that the NDA will have to firstly undertake to identify what national engagement requirements are for a given period. This involves establishing what subjects need to be included and who needs to be engaged; prior to determining, which of the engagement components will be used to deliver them.

These components would be part of a suite of mechanisms that would be drawn on to deliver the requirements of national engagement according to which best met the need. The engagement components are:

Subject Specific Engagement (face to face). This would be drawn on to engage upon single specific and significant subjects, which require a more in-depth discussion. By the same token, participation in these meetings would involve specific stakeholder representation according to the subject at hand. The component would provide an open and flexible approach towards scope, scale and format.

National Stakeholder Meeting. This would be drawn upon to meet a specific requirement for a national strategic discussion and provide the key features of a large scale multiple-party, face to face meeting; and, to meet stakeholder requirements for a forum for building trust, relationships, networking, accessing the senior executive and the 'fringe' meetings that happen in the margins of such cross-sectoral meetings.

Website/ Online Engagement. This could be used for cases that do not require in-depth engagement, for instance, where the opportunity for stakeholder influence is quite limited. The website could also be used for highly technical questions in instances where these would not require cross-dialogue. This could involve formats that are already used by the NDA such as online consultation.

The **Other existing engagement** covers the range of other existing standing groups and bi-lateral interactions that also provide engagement opportunities. This could also be drawn on in the same way as the other components according to whether this was indicated by the purpose and priorities established through the subject mapping approach. TEC recommends that 'Other Engagement' would first require a process of mapping and review itself by the NDA to provide data on how to best rationalise these meetings and make better use of NDA and other stakeholder resource.

The **Critical Enablers** are supporting processes, which underpin the other components. These include the following elements:

The proactive support of the Executive for evolving and robust engagement **(Leadership);**

The enhancement of the capabilities and ways of working of NDA staff to engage; ensuring that engagement is driven by purpose and priorities and adoption of a topic mapping approach; evaluation of and learning from engagement and demonstrating its impact **(Capacity Building);**

It is important that the information about what is being engaged upon, who is being engaged and how across the use of these components is centralised and widely shared. This also includes the outputs from these engagements and what key messages the NDA are taking from them. The website has another and different role to play in this regard; to act as a central hub for this information **(Communication).**

As indicated by the **arrows** in the diagram, these components are both initiated by and feed into the topic mapping approach that establishes engagement requirements. For example, outputs from the subject specific engagement might have a requirement to be fed back to the wider group of national stakeholders via an information update through the national face to face stakeholder engagement.

9. Conclusion

The ultimate purpose of all engagement is to make things better, and the ultimate purpose of engagement evaluation is to make things even better. There is little value in spending time and money on engagement or evaluation if there is no willingness take account of its results. All involved must be open to the possibility that existing ideas can be improved and that they will, if necessary, be amended. In the same way, there is no benefit in commissioning and taking part in an engagement review, if at the end of it the status quo is maintained (unless this is a clear recommendation coming out of the review).

In this instance, after almost four months working on this Review, TEC has gained enormous insight into what it feels should be the way forward for the NDA's national engagement. Our Recommendations imply maintenance, enhancement and changes in approaches and actions from all parties, and we believe these recommendations are realistic in their ambitions and expectations. We have provided a Recommended Option, an essential part of which are the critical enablers as supporting processes that underpin the engagement components. These will require renewed focus and changes in order to work and the success of the new engagement phase will depend on the willingness of all to recognise that moving forward requires these efforts.

We believe that the endeavours we have taken in our research and the driving concept of engagement being fit for purpose, which have shaped this report and its Recommendations, will enable it to both resonate with stakeholders and the NDA alike, as well as being a robust reflection of good engagement practice. The real proof of the Review is in its implementation. We believe that these factors, that have informed the Review and its report, will also make it realistic, helpful and above all welcome in practice.

Finally, we would sincerely like to thank those that gave their time and considered input to inform this Review.

Appendix 1: The Environment Council

The Environment Council is the appointed convenor for the NDA's National Stakeholder Group.

The Environment Council is a UK registered charity of 40 years standing. It works to put sustainability at the heart of people's choices, decisions and aspirations. Its goal is to transform conventional decision-making by including best-practice engagement in realising sustainability aims. It has long-standing experience of raising awareness, training, facilitation and providing a forum for dialogue. TEC helps all kinds of organisations make the difficult and complex decisions needed for a sustainable future.

The Environment Council principles of authentic engagement are:

Inclusiveness: encourage the participation of all stakeholders who have an interest in or who would be affected by a specific decision, including 'hard to reach' groups, such as young people, minorities, and socially mobile professionals.

Transparency, openness and clarity: ensure stakeholders are given all the information they need, tell them where information is lacking or things are uncertain, indicate clearly what they can or cannot influence by responding, and provide an indication of next steps.

Independence: using a neutral convener and independent facilitators, especially in highly polarised situations, can help to build the confidence of stakeholders. It is difficult for a sponsoring organisation, whether local authority or private company, to facilitate an independent process, and the attempt to do so may in itself arouse suspicions about the integrity of the process.

Resourcing: good engagement processes need both time and money. Running out of either is frustrating for all. Furthermore, it can actively undermine everything previously achieved. Spell out the resource implications at the outset and be wary of starting what cannot be properly completed.

Commitment: show respect for both stakeholders and taxpayers by giving engagement the appropriate priority and resources, and demonstrating that it is a genuine attempt to understand and incorporate other opinions even when they conflict with the existing point of view.

Accessibility: provide different ways for people to be engaged and ensure people are not excluded through barriers of language, culture or opportunity.

Accountability: as soon as possible after the end of engagement processes respond to participants with an unambiguous account of how and why their contributions have - or have not – influenced the outcome, and ensure there are routes for follow-up including reporting on final decisions, strategies and/or implementation plans.

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Responsiveness: there is little purpose in spending time and money on engagement if there is no willingness to listen to its results. Those doing the engaging must be open to the idea that their existing ideas can be improved (or are wrong), and that they will, if necessary, be amended. Those being engaged must perceive that their voice will be taken seriously, and that things can be changed. If they do not perceive this, the engagement process will be regarded as a sham, and it will be harder to involve them the next time their views are needed.

Willingness to learn: all engagement should encourage everyone to learn from each other, and this means a style of process that is as interactive and as incremental as possible to build increasing layers of mutual understanding, respect and relationship.

Productivity: the ultimate purpose of all engagement is to make something better. How an engagement process will do this needs to be set out to encourage stakeholder participation and assure them that neither their time nor the sponsor's money is being wasted.

If you have any comments or queries about this report please contact Erica Sutton at TEC by email erica@envcouncil.org.uk, or on 0208 144 6945.

Appendix 2: Acronyms Table

DECC	Department for Energy and Climate Change
EA	Environment Agency
HSE	Health and Safety Executive
NDA	Nuclear Decommissioning Authority
NGO	Non Governmental Organisation
NSG	National Stakeholder Group
OER	Organisational Effectiveness Review
PBO	Parent Body Organisation
SA	Strategic Authority
SDDG	Strategy Design & Delivery Group
SLC	Site Licence Company
SSG	Site Stakeholder Group
TEC	The Environment Council

Appendix 3: Summary review findings

Summary: 'Who Should The NDA Be Engaging?'

- Linked to the question of 'who to engage', comments were made on the **mechanisms to engage different audiences** (e.g. it might be easier to target specific audiences if the emphasis was not on one big event; having a debate with regulators in a public environment is difficult; engaging with a group of coordinated organisations through a single-issue voice on a given issue is seen as helpful; where changes of operation are likely to occur in the future, site-specific engagement should occur with groups like trade unions).
- An important feature of national engagement was identified as involving a wide range of stakeholders. An under-represented group in this is **NGOs** (e.g. Greenpeace, Friends of the Earth, and anti-nuclear groups such as the Peace Camp at Faslane) and it was identified as a necessity to address this. It was observed that NGOs have different objectives to that of other NSG participants and that their interest in what the NDA are doing differs to that of other stakeholders. They bring a greater breadth of viewpoint, but participation (especially at recent NSGs) seems to have declined because they feel they're not being listened to or getting the support from other stakeholders. NGOs have to get past the barrier of a lot of other stakeholders who are not open to hearing the challenges that NGOs make. It was said of the NSG that it was a bit of an industry-based 'old boys club' where there was little disagreement. NGOs (as with other stakeholders) have the option of meeting with NDA individuals and potentially Executive members on an ad hoc basis and some have taken this opportunity.
- The role of NGOs as the 'Third Sector' and providing a voice for civil society is deemed a highly important one in engagement terms, as it offers an alternative perspective to government or industry. The desk research also found that their voice as an 'expert' is more trusted by stakeholders as independent and accurate, therefore NGOs 'have a responsibility to attend'. In the case of NDA engagement, NGOs can often represent a 'green' agenda, which can be a minority voice in nuclear dialogue. Hence it is important to ensure robust and balanced opportunities for NGOs to participate and influence NDA's decision making.
- **Various other stakeholders** were mentioned by interviewees, but they did not gain the same degree of agreement as involving NGOs did These included learned societies; representation from DECC; Government representation- preferably an MP/ Minister with an interest in energy; including representation from Scotland and Wales; key professional societies, including the National Skills Academy for Nuclear; senior representatives of companies involved with new build as well as contractors involved with the decommissioning preparations; overseas stakeholders (France in particular). If the NDA's role, as defined by Strategy II involves more work on implementation issues, then it will be necessary to re-examine who key stakeholders are. For instance, local planning officials may need to be engaged.
- The need to **benchmark against / get input from others** was identified as a clear message, with consideration given to international

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case studies from the nuclear decommissioning industry and benchmark against other sectors, such as oil and gas. One of the benefits highlighted was that shared learning with big energy companies would promote joint problem-solving and smarter working.

- It was suggested that the **media** could be involved from the perspective that the NDA National Engagement would gain valuable exposure but this was not a universally shared view between interviewees. While stakeholders want to see good news related to the NDA's work reported, they thought the risk of media presence limiting the openness of stakeholders was a risk.
- Comments were made on **what should be expected from stakeholders involved.** It was suggested that the current list of engaged stakeholders should be reviewed to make sure that those invited are still relevant; there should be clear guidelines relating to the number of delegates per group; stakeholders should be better prepared before-hand, and ensure they have consulted the group they represent; and attendance of organisations at national engagement events should be kept consistent - e.g. Scottish Enterprise attends but Highland and Islands Enterprise is missed out.

Summary: 'What NDA Engagement Should Be?'

- Identifying the right level of engagement (project, local or national) appeared to be a common thread throughout the review, with both the benefits and limitations of tackling local issues at a national level raised (e.g. it allows parallels to be identified and sharing learning as well as enables local problems to be set in the prevailing national context, but it can also allow local groups to push their agenda during national engagement, making the rest of the audience feel like the discussions have been hijacked).
- There was a view that NDA engagement with government and regulators is a different kind of engagement to that with stakeholders. It usually happens more regularly, earlier and is organised in response to the needs of the specific subjects.
- In order to identify what engagement should be, interviewees were asked to think about successes and limitations of current national engagement practices. **Successes** included responses on:
  - Attitudes (e.g. NDA willingness to listen and be transparent, the opportunity for stakeholders to express views with confirmation that these are heard, recognising that communities are important and involving them)
  - Ways of working (e.g. promotion of joint-working and problem-solving between sites, improved credibility and approval of the NDA with stakeholders through team working)
  - Roles (e.g. access to and developing links with NDA management, assurance and evidence of the technical competences of NDA staff)
  - Inputs (e.g. gaining creative, useful input on plans)
  - Outputs (e.g. the development of specific NDA work such as the strategy, better understanding of socio-economic issues, influencing NDA strategy)

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- o Outcomes (e.g. modified behaviour and performance from NDA staff, reinforced trust, mutual respect, improved communications in both directions due to a willingness to engage)

Limitations included responses on:

- o Perceptions (e.g. NDA work can seem all about consultation and not getting on with actual delivery on site progress, some NDA staff see engagement as a chore and can be patronising, perception that non-engaged stakeholders lack expertise to contribute)
- o Audience (e.g. lack of NGO involvement, NGOs feeling that they are tolerated rather than listened to by other stakeholders and the NDA; need for the NDA to reach wider, particularly beyond SSGs, to ensure important messages are heard and responded to)
- o Reporting mechanisms (e.g. no clear feedback loop on changes made by NDA following stakeholders' comments)
- o Expectations management (e.g. NDA imply that more is up for grabs through engagement than what actually is, perception that NDA engagement is a tick boxing exercise, payment not made in compensation for time commitment)
- o Engagement topics (e.g. focus on technical issues at the expense of "softer" subjects, technical issues have not always been accessible because of language barriers, perceived reluctance on the part of the NDA to give appropriate priority to socio-economics)

- **Suggestions** were made for the improvement of engagement. These included responses on:
  - o Follow engagement good practices (e.g. proactive and responsive approach from NDA, clarity on expected outcomes from engagement, what decisions will be made, when, and where these can be influenced by stakeholders, more accurate record of technical nuances from stakeholder feedback, better reporting mechanisms, retain face to face engagement)
  - o Adopt new national meeting format and location (e.g. smaller, technical and policy meetings complementing larger, multi-sectoral meetings like the NSG, regional meetings, location of national meetings examined in the context of all stakeholders with a moveable location for standing meetings considered)
  - o Allow access to senior representatives (e.g. Senior NDA staff, Ministers)
  - o Deliver efficiency and costs savings (e.g. prevent stakeholder fatigue, demonstrate engagement achievements / impacts, 1 day event instead of 3 days, hold ad-hoc meetings, reduction in red tape, demonstrate progress on decommissioning not just planning)
  - o Demonstrate professionalism (e.g. confidence in the fact that the NDA is run by people concerned about what they're doing, NDA staff to see engagement as an opportunity not a threat, improve use of language and communication skills,)
  - o Cover a wider range of topics (e.g. socio-economic, stakeholder views gained on all headline policy issues, spending review process,)

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- Make better use of online resources (e.g. website, online consultation, more use of video materials, monthly email alerts, information more easily found and accessed)
- Communicate more widely (e.g. NDA engagement with NGOs, proactive publicity of NDA's good work. Report and link up information flows between different engagements that are happening)
- Develop benchmark (e.g. with other sectors, with other countries, to incorporate best practice and understand where NDA is in comparison)
- Clarify remit of engagement (e.g. new build, what NDA's role will be when nuclear plants shut down. Changes in line with Strategy II.)
- Adopt a more localised approach to engagement (e.g. strengthen local links and focus on regional issues, focus on regional engagement via addressing regional issues)
- Maintain trust (e.g. dispel negative perceptions of the industry)

Summary: 'Why Should Engagement Happen?'

- Interviewees **valued engagement from different perspectives**, with NDA talking about the benefits of engagement more from an organisational perspective (e.g. demonstrate that NDA is open & transparent, build trust, demonstrate accountability, gain support, overcome myths and preconceptions, get input on strategy) and stakeholders talking about the benefits from a wider perspective (e.g. make NDA aware of the impacts of its decision-making, allow cross-fertilisation of ideas, allow wider concerns from various sectors to be better understood).
- **Engagement on local issues within a national context** was identified as important by both NDA and stakeholders, as national engagement allows local people to share their experiences at a national level. This was said bearing in mind the limitations of how representative the current local and national voices are (e.g. lack of national NGOs involved, SSGs representation constituting a large proportion at meetings, accountability and ensuring people reflect the views of those they represent).
- **Engagement in the context of the current economic crisis** was identified as important. From a stakeholder perspective, there is a compelling need to ensure all government spending is efficient, and from NDA perspective it offers opportunities to discuss and explain the consequences and priorities of the spending rounds, especially if engagement was tuned in with NDA business cycles (e.g. production schedule of annual report, with opportunity to brief on previous year and coming year).

Summary: 'How The NDA Might Engage In The Future?'

- There was much variability in the **frequency** with which engaged stakeholders think that the NDA should involve them in national engagement- ranging from monthly to once a year. Suggestions were made in favour of the development of a strategic decision calendar

approach from NDA in conjunction with stakeholders. It was thought that engagement should certainly be planned to encompass major events or decision points coming up in the future. Stakeholders should be engaged so as to have the maximum impact on development.

- **Clarity from stakeholders on their issues of interest and importance.** Dialogue should include opportunity for the NDA and stakeholders to discuss what should be engaged on and agree a programme for this engagement as well as appropriate mechanisms for this.
- **Identify what NDA needs to engage on and why** as well as identifying what NDA want to get out of engagement (e.g. ensuring that what is being engaged on needs engagement and that issues are not included just because they are standing agenda items).
- Develop **stakeholder mapping** as a first step to decide appropriate engagement mechanisms for each stakeholder group.
- Views were that 'one size fits all' engagement is less useful than **appropriate/ fit for purpose methods of engagement** (e.g. use websites and publications, meetings only when stakeholders input is required, correct use of visual materials such as posters for information giving, engagement via email for information provision pre-workshop or website as a alternative engagement platform, widened circulation of the newsletter, networking, breakout sessions, smaller meetings about more specific subjects rather than large general meetings).
- Feedback indicated people would like to see more **efficient face to face meetings** (e.g. capture the key comments at the end of each session, rather than providing verbatim recording, offer clarity on roles between NDA staff and convenor at the events, one day meeting).
- Ensure **appropriate communication** (e.g. technical developments communicated in a concise way in lay terms, whilst being accurate and true to fact, and in advance of each workshop rather than on the day, information provided should be as honest as possible).
- Ensure **appropriate resources** are deployed (e.g. staff time to keep web pages up to date, should aim to achieve best value for money).
- **NDA to provide feedback mechanisms/ reporting** (e.g. how stakeholder input has been used, stakeholders to share what they are taking away).
- Ensure **appropriate level of engagement** (e.g. regional workshops).
- Engagement should be made **responsive and flexible** (e.g. engaging on new emerging issues such as new build, topical matters such as deficit cut, responding to a significant nuclear incident either in the UK or abroad).

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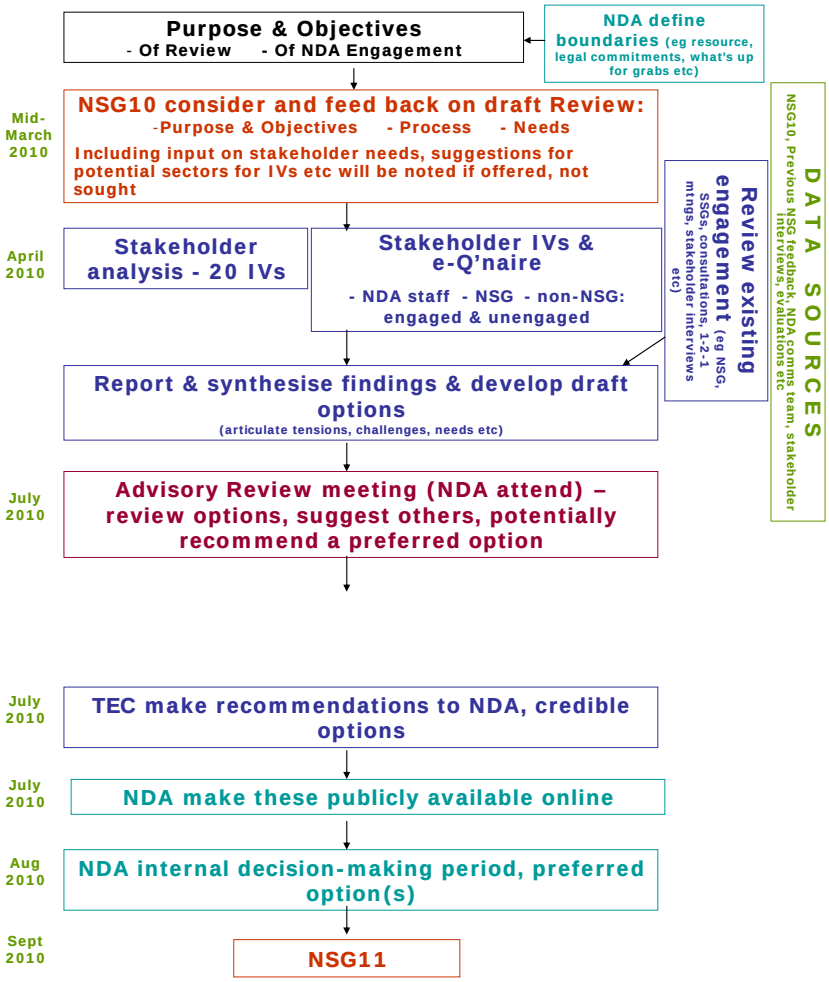
Appendix 4: Engagement Review Process



Appendix 6: Engagement Components

Website / Online Engagement

There was strong feedback from stakeholders that they wished to see an enhanced NDA website. This could be used for increased information-giving, as well as for two-way communication and potentially engagement.

What we are describing is use of the website as an engagement mechanism, that is, a medium by which people can engage directly on a specific topic or question. Note that this is separate and different to the purpose outlined in the section on Critical Enablers, where the website acts an information hub *about* the NDA's engagement: providing a calendar of engagement, information on what is being engaged, who is being engaged and how, the outcomes and feedback loop.

This component would be targeted and used through the mapping and prioritising of engagement as set out in sections 5.1.2, 5.2.2 and 5.3.1. The way TEC envisages this is that the website could be used for cases that do not require in-depth engagement, for instance, where the opportunity for stakeholder influence is quite limited. The website could also be used for highly technical questions in instances where these would not require cross-dialogue. This could involve simple formats that are already used by the NDA such as online consultation questionnaires.

This approach would enable the opportunity for stakeholder feedback across the breadth of issues while maintaining face to face engagement opportunities for the occasions where the need is specific and really adds value. It helps to support the prioritisation of NDA and stakeholder time and resources appropriately.

It should be noted that stakeholders have also reflected to us that they do not wish to see a replacement of face to face engagement by electronic means. Neither does TEC recommend it as an overriding approach or component for future engagement in this Review. The website would be part of and interact with a wider set of engagement components for national stakeholders. Subject specific and national engagement (face to face) would be part of this suite of engagement provision.

Looking forward, there is an opportunity for the NDA to use web-based, more innovative and interactive engagement as described in section 5.3.2. This would require considerable and dedicated resource from NDA and would require considered use, to ensure that it is accessible and fit for purpose. Given the increased and increasing use of information technology in society and the timescales of its role, this is something that the Authority needs to keep on the table for future development, which should be led by need and appropriateness.

TEC regards the immediate priority for any enhancements to the website as being those that enable it to:

- Fulfil a role as a hub of engagement information to support the process of mapping and prioritising engagement and sharing its outcomes.
- Provide a simple mechanism for engagement in the targeted instances described above and using formats already familiar to the Authority.
- Ensuring that its content is clearly signposted, accessible and up to date.

National Stakeholder Meeting

National face to face engagement speaks to a number of important requirements for stakeholders. As outlined in section 5.4.1 of this report, these encompass building trust, relationships, accessing the senior executive and the opportunity to meet with and hear the views of others in a multi-sectoral context.. These deliver benefits not just for stakeholders but also for the NDA, in particular the building of trust and relationships. National face to face engagement needs to be provided to continue to meet these requirements.

National face to face engagement would have a different scope and purpose to its current form, in that it would be part of and interact with a wider set of engagement components for national stakeholders rather than being the only (or at least primary) engagement mechanism available. Subject specific engagement (face to face) and the website would be part of this suite of engagement provision. These other components would need to be utilised and to be conducted effectively in order to support this change of scope and purpose to national face to face engagement.

A National Stakeholder Meeting would form another opportunity to provide a hub or overview for the range of engagement being undertaken by the NDA. Updates or report backs from the outcomes of other engagement activities, and highlighting forthcoming engagements and the scope of future mapping would help to communicate both the big picture and the detail of NDA's involvement of national stakeholders.

Just as the other engagement components would be targeted and used through the mapping and prioritising of engagement as set out in sections 5.1.2, 5.2.2 and 5.3.1 so it would be for the National Stakeholder Meeting. The topics brought to face to face national engagement would have a specific requirement for national strategic discussion and the key features of this component, which involves a large scale multiple-party, face to face meeting.

We would expect this component to be more streamlined and flexible than the current NSGs. Since the entirety of national engagement would not have the same dependency on a single component, we would expect each meeting to involve a shorter programme and accordingly a shorter

timescale. We would also anticipate that the scheduling and the frequency of the event should be informed by the mapping of engagement so that this is driven by the need rather than the diary. We would however anticipate that in order to meet the needs outlined in section 5.4.1 and described above that the national face to face engagement would have to take place at least once a year. In the same way that Subject Specific Engagement should be aligned with the annual Business Plan, the National Stakeholder Meeting could focus on Strategy II. Hence it may be prudent to have annual meetings in the earlier stages of Strategy II, supported by the other components and engagements. Towards the need to form a next revised Strategy (III), the frequency and/or duration of National Stakeholder Meetings might increase commensurately. Once again the purpose of the engagement is the primary factor to determine before deciding the logistics or mechanisms.

Sponsored National Decommissioning Conference & Fringe meetings

In considering forms for national engagement and different ways to meet the diverse needs of stakeholders, TEC examined the potential for a commercially Sponsored National Decommissioning Conference & Fringe meetings. This would be a conference that would be convened by the NDA, with sponsorship from commercial organisations with an interest in decommissioning. It could place NDA in a leadership role on the issues, would seek to facilitate networking and sharing of information and would meet some (not all) of the needs identified by stakeholders. In being sponsored it would ideally be cost-neutral to the NDA. However it is important to note that organising events of this scale and securing sponsorship for them is a resource-intensive process in itself.

It could act as a hub of information exchange, and provide free access to participants, unlike existing conferences. It could also be used by other (government) organisations in the same way NSGs are, to make themselves accessible to stakeholders in one central place. Fringe meetings lead by various bodies could happen around the event.

Whilst it could potentially offer these benefits, TEC did not include this component in our final Recommended Option. There are several reasons for this. The first is that conferences are usually not an 'engagement' mechanism i.e. participants rarely have any impact on decision-making and there is little that they can influence. Hence in this Engagement Review, TEC does not view it as an engagement mechanism as such. Further to this, when it was tested with the Stakeholder Review Group, there was thought to be little advantage in creating yet another conference. There was also concern about conflicts of interest. For instance, would the NDA's independent role be compromised by accepting commercial sponsorship for their conference and would sponsors want to drive the agenda.

The NDA may wish to consider this as a future activity but at this stage TEC recommends focusing on optimising existing engagement to best further the organisation's remit.

Subject Specific Engagement

Subject Specific Engagement would be part of and interact with the wider set of engagement components for national stakeholders. National Stakeholder Meetings and the website would be part of this suite of engagement provision.

The convening of such engagements would be informed by the prioritising and mapping of the 'what, who and how' as outlined through the Recommendations. The use of this component would be identified and targeted through the mapping and prioritising of the entirety of the NDA's national engagement. The frequency or number of these meetings would also be informed on this basis.

As its title suggests, the face to face engagement would involve a single specific and significant topic, requiring an in depth discussion. By the same token, participation in this meeting would involve specific stakeholder representation according to the topic at hand.

Stakeholder attendance would be driven by the purpose. The meeting could be multi party or could also involve a limited range of stakeholders if this was more appropriate to the discussion. The attendance of organisations would depend on what they were bringing to the discussion.

We envisage that an open and flexible approach towards scope, scale and format is needed to maximise the value that subject specific engagement would bring to the NDA's national stakeholder engagement.

The convening of the subject specific engagement would be open and transparent. What it would cover and who would be involved, reporting and outcomes would be widely shared. Such information would be posted on the NDA website through its function as an engagement information hub and also signposted at the national face to face engagement events.

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Appendix 7: List of Recommendations

Recommendation 1: Clarity of NDA Remit and therefore Purpose of Engagement
NDA redefines and articulates its role and remit
Define the purpose of engagement for the NDA

Recommendation 2: Optimise Engagement Through A Strategic Approach
Leading coordination of strategic engagement on nuclear decommissioning
Mapping all 'Other' NDA engagement activities
Linking engagement mechanisms
Optimising partnership working

Recommendation 3: Ensure that Engagement is Fit for Purpose & Flexible
Adopting a subject mapping approach
Enhancing the NDA website and using it differently

Recommendation 4: Build an Engagement Culture
Acknowledging what stakeholders articulate as needs from engagement
Engendering an ethos of open, proactive engagement throughout the NDA

Recommendation 5: Demonstrate Accountability
Improve use of evaluation throughout the organisation
Review stakeholder involvement

The following areas of Recommendations will require re-examination by the NDA in context of the OER, as the organisation will need to assess its capability and capacity to deliver engagement within the new organisational structure. The following areas are those that require priority and attention in the short term, in order to be achieved in the medium to longer term:

- *Define the purpose of engagement for the NDA*
- *Mapping all 'Other' NDA engagement activities*
- *Adopting a subject mapping approach*
- *Enhancing the NDA website and using it differently*
- *Review stakeholder involvement*

Note that there are some areas of the Recommendations that can be viewed as a 'checklist' of good practice for the NDA to use (eg linking engagement mechanisms and improving the use of evaluation). These serve as reminders for areas of work that simply require enhancing.