

Review of the Operation of the Dounreay Stakeholder Group

Executive Summary

The Dounreay Site Stakeholder Group (DSG) takes time every year to reflect on the achievements and lessons learned during the past year and to discuss any changes that might be necessary to help it meet the evolving needs of the community. Every few years it also undertakes an extended independent review, and this report covers the results of the latest such study.

The scope included the DSG's four main roles (oversight; socio-economics; communication; and consultation) plus consideration of its structures and working practices. Conclusions were to be based on: observation of one full DSG meeting and one meeting of each of the Site Restoration and Socio-Economics Sub-groups; structured interviews with Members and stakeholders; and some comparison with other NDA site stakeholder group experience.

The review's main conclusions are as follows.

- Many Members put in huge amount of unpaid effort and the DSG is amongst the best of the NDA's site stakeholder groups in most of the things it does.
- All our interviewees commented on how well chaired and organised the DSG and its sub-groups are. Members are generally motivated and effective.
- The membership of the Site Restoration Sub-Group has been strengthened. The Group now works effectively and offers a stronger critique of site operations. It should be retained.
- The socio-economic landscape is more complicated than it was, and other bodies now cover topics that the DSG used to address. There is widespread frustration at overlaps between the various committee discussions. The DSG Socio-Economics Sub-Group is well run and should be maintained but **must** focus on its core remit. Other bodies have similar problems and a joint review may be best.
- There have been notable successes and we recognise that Members continue to see the DSG as an important mechanism for stimulating and adding weight to efforts to lobby other organisations on matters of broader socio-economic importance. This does not make it impossible to achieve the necessary focus in its own meetings but can make it more challenging.
- Reporting from Vulcan and relationships with MOD have improved since our last review but there is still insufficient focus on its activities.
- The membership is aging and urgently needs renewal and more diversity, though this will not be an easy matter. The time may be right to move towards a significantly smaller Group.
- The public DSG meetings are a necessary safeguard but add little for most participants. Changes should be considered to the scope and format.

1. Background

Purpose & scope

The Dounreay Site Stakeholder Group (DSG) takes time every year to reflect on the achievements and lessons learned during the past 12 months and to discuss any changes that might be necessary to help it meet the evolving needs of the community.

Every four years it also undertakes an extended review with independent external input. This report contains the conclusions of the latest such review, carried out by David Collier of White Ox, who also carried out the last such study in 2012¹.

The terms of reference for our work and a conflict of interest statement are in Annex A. They required an assessment of DSG's four main roles (oversight; socio-economics; communication; and consultation) plus consideration of its structures and working practices.

Conclusions were to be based on: observation of the December DSG meeting and the January meetings of each of the Site Restoration and Socio-economics Sub-groups (SRSG/SESG); structured interviews; and some comparison with other NDA site stakeholder groups (SSGs) based on our own experience and NDA comment. The 24 people interviewed are listed in Annex B. A review was also included of the document collating questions asked by members at DSGs over the last twelve months on radioactive material transport to determine whether they had all been answered.

A draft copy of this report was submitted to the Chair, Vice-Chair and Secretariat prior to the DSG in March 2017 to allow any misunderstandings to be corrected, to enable them to offer any additional insights, and to give them an early indication of the balance of comment. However, no changes have been made because of comments relating to our interpretation or judgements on adequacy.

The draft report and its implications was also discussed at a members' workshop on 28th March. There is a separate record of that event so we have not updated our report except in respect of the DSG's advocacy role, where as a result of discussion at the workshop we feel we had not captured the full scope of the comments made.

The remaining sections of this report consider each role in turn, followed by an assessment of the implications for arrangements, DSG Terms of Reference (ToRs), and working practices. Our conclusions are summarised in Section 6.

Acknowledgements

Our interviewees were unfailingly generous with their time and insights and we are grateful for their help. However, this report is based on our analysis and interpretation. Participants did not review our interview notes. There were some differences of view, we may have misunderstood some of what was being said, and we cannot claim to be speaking for everyone. Our comments should therefore be considered alongside their direct feedback.

¹ Review of the Operation of the Dounreay Stakeholder Group (Issue 1.1). White Ox, April 2012

We recognise that the roles the DSG undertakes are extensive, intellectually demanding, and time consuming. In pointing out any areas that might be strengthened we (and the external DSG stakeholders we consulted) are very conscious that the Group is mostly made up of volunteers who are taking on responsibility without financial reward. The owners, operators, and regulators of Dounreay and Vulcan, and the wider community, should be grateful for their efforts.

2. Oversight of Site Restoration Programme

Scope

Oversight comprises monitoring and 'constructive challenge' in respect of health, safety and environmental issues, emergency response arrangements, and programme delivery generally. Its ToRs are the same in respect of Dounreay and Vulcan on these topics.

DSG's oversight only provides additional assurance; it does not include any regulatory function of its own and there are clearly limits to what any SSG can achieve. Nevertheless, visible constructive challenge is widely seen as vital to community confidence as well as making a genuine contribution to maintaining NDA, MOD and site performance.

Oversight Role

The main forum for oversight is the Site Restoration Sub-Group (SRSG). Minutes are taken but in the absence of press and public the discussion can be more open and candid (though inevitably less so for Vulcan). Key people from the sites and regulators attend and presentations are requested and given on technical topics. For instance, SEPA's specialist gave a presentation on progress on the 'particles' issue when we were there.

The hazards may be reducing but there will still be major strategic questions to address – including interim end states - and a revised site closure programme to engage with. Our view is that the SRSG will be needed for some years to come, probably in something like its current form.

Our 2012 report noted that the DSG was perceived as having a 'light touch' approach to oversight which the majority of Members and observers believed would fall short of what was needed. The view this time was more positive and our own observation supports members' and observers' perceptions that oversight and constructive challenge of DSRL has 'toughened up' and that, although there may still be scope for improvement, it now often gets the balance about right. We appreciate that the Sub-Group also acknowledges Dounreay / Vulcan good practice and achievements as well as problems. Our interviewees generally thought it functioned well and none suggested any significant change.

New 'community' members have obviously strengthened this sub-group's technical capability. As they themselves pointed out to us, members who used to work on site must keep a balance between deploying their expert knowledge and pressing the site for a level of detail beyond what is needed for the level of scrutiny the DSG provides.

An important DSG role is assuring itself of the rigour of NDA and regulatory oversight, and probing in more detail any significant issues arising. Some interviewees felt in 2012 that this was not done very effectively but our perception this time around is again that performance has improved. Regulators' reports seem more useful and they recognise the Sub-Group as a well-informed audience. They seem better at communicating how they regulate the site and how they are addressing issues that arise. We heard less criticism of regulators for not being challenging enough or being too 'cosy' with site management.

DSRL and MOD management were very open in their discussions with us and generally seem to us to have a constructive and appropriate attitude to the Sub-Group. They clearly recognise the importance of the DSG to public confidence. Some Members would no doubt prefer more information in site operator and owner reports but the level of detail (perhaps with a slight caveat regarding Rolls Royce) seems defensible to us.

Our impression was that regulators are playing a constructive role and trying to support the DSG's purpose without leading them. Their reports seem appropriate.

By comparison with the SRSG, the main DSG meetings are a poor forum for oversight although there must always be an option for raising unresolved issues in public. We have more to say on DSG public meetings later in our report but there is one issue that needs further comment here.

Transport of Nuclear Material

A recurrent topic at recent public DSG meetings has been the transport of nuclear material from Vulcan and Dounreay. We were asked to look at this area in particular, so in response we have included an extended commentary here.

Some Members and observers seem frustrated at the persistent questioning in the public meetings on topics (e.g. investment in runway upgrading for the airport) which are outside site control and where further information is unlikely due to security, shortening the time available for other topics. On the other hand, those asking the questions still seem frustrated at a lack of answers.

Our view is that radioactive material transport safety is a valid issue on which to ask questions, and we hope Members would seek assurances of the sites and their regulators. We would have criticised the DSG if questions had not been asked, and those asking them have, as far as we can determine, always posed them politely.

However, it seems to have become an on-going and predictable issue without obvious resolution. Hopefully, all Members will feel this topic gets acceptable but also proportionate coverage going forward. If this is not the case, some change may be needed but we would not want to put barriers in the way of what may be important future questions or concerns.

We have reviewed the questions posed by members at the DSG on this topic and as far as we can see, they have all had a response. Those responses may not be totally satisfactory to those asking the questions but they appear as open as they could be given the restrictions on information that can be released and the limitations of the DSG's remit. If this is the case, Members should maintain a watching brief but in the meantime, we suggest they accept as definitive the 35-page summary document already tabled with all the questions and answers on the topic to date by the various parties to the debate. We apologise if we have missed anything and invite Members reviewing this draft to draw our attention to any outstanding issues so that we can consider in the final issue what needs doing.

A contributory problem has been that the issue is being raised in the public meetings where time is limited and discussions with regulators and observers are inevitably less interactive than they can be in the sub-groups. The obvious solution would be for those raising the questions to come to the SRSG, where they could also raise other issues and contribute more generally to this oversight forum, but the Member(s) most involved live some way away and travel expenses are not payable under the DSG TORs and NDA guidance.

We do not think it is going to be acceptable to the DSG or NDA to pay individuals to attend routine meetings so if more discussion is merited than fits with the public meeting format, options could include the following.

- For the interested Member(s) to pay their own expenses to come to the sub-group, if there are issues they wish to raise. It may be more relevant to them to come to the sub-group than the public meeting, if a choice has to be made.
- For the Chair to limit discussion in the public meetings but, if they judge it appropriate, invite interested Members to the stay behind afterwards for a few minutes with relevant observers and regulators.
- For Members to make an exception if an SRSG meeting were to include special presentations on the topic and make a contribution to expenses. Given the ToRs and NDA guidance, this would be discretionary and a one-off gesture. It may be more acceptable if the Member(s) were representing an organisation.

MOD and Rolls Royce Engagement

We were critical in our last report of the level of oversight of Vulcan and the MOD's responsiveness to requests for information. The feedback from Members and stakeholders is that things have improved, perhaps in part as a reaction to concerns in the wake of the fuel pin failure. The site visit and MOD's invitation to the DSG to observe an emergency exercise were appreciated.

Our discussions with MoD management and (less formally) Vulcan regulators have been constructive. It is clear that they do not see themselves as subject to oversight in the same way as DSRL and its regulators, but they do recognise the importance of engagement and scrutiny, and indeed seem to want it to become clearer that this is what is happening.

The DSG's ToRs in respect of Vulcan are essentially the same in respect of oversight for both Dounreay and Vulcan and no one we interviewed suggested this was inappropriate.

The group will also function as the Local Liaison Committee for the Vulcan Naval Reactor Test Establishment, providing a formal interface between the Ministry of Defence operator, the Naval Superintendent Vulcan and the local community.

Since the ToRs are clear that the DSG functions as the Local Liaison Committee for Vulcan, it seems anomalous that the MOD contributes nothing towards its costs, especially since it would have to make alternative arrangements if the DSG did not accommodate it. Our impression is that MOD would respond if asked, so we suggest they unambiguously commit to agree to pay, say, for the room and refreshment costs for one in four main DSG meetings.

It was suggested to us that to improve clarity and focus, at sub-group and DSG meetings it would be much better for all Vulcan reports to be taken together as a more clearly separate agenda item and follow-up questions dealt with before moving on to the Dounreay equivalents. This seems already to be the objective, so we suggest that the Secretariat asks Members and Vulcan observers whether they have any specific suggestions.

The DSG is aware that there is an MoD project team looking at alternative closure strategies and following our last report there was a well-received presentation on the general shape of the option assessment process. An update would seem timely and would be a positive gesture.

Interviewees recognise that the MOD has no socio-economic remit in the same way as the NDA, though it does have a 'good neighbour' policy.

Rolls Royce reports to the SRSG appear rather limited to us and to Members and observers who commented on the matter. If the DSG wants something different from these reports, it needs to ask for it and be specific.

More generally, Rolls Royce seems to keep a very low profile. As in our last review, some interviewees drew attention to the potential benefits for both the community and the company of increasing engagement by Rolls Royce in local socio-economic initiatives (presumably as a stakeholder not as a funder), especially now that the MoD's position is becoming clearer. Rolls Royce is a major employer and a high-profile company with an excellent reputation. Thurso is proud of its presence and would like to make more of it, including as part of marketing the area to the energy sector and other businesses.

Emergency Planning

The DSG ToRs task it with reviewing arrangements for emergency response at both Dounreay and Vulcan. In previous reviews, we noted that engagement on emergency planning deserved greater priority. However, as decommissioning proceeds, the emergency planning and response requirements will diminish and the degree of attention paid may be more appropriate.

We think the DSG should clarify what it intends to do in respect of emergency response going forward. It should ensure there is no unnecessary overlap between its remit and that of the Dounreay Vulcan Off-Site Emergency Planning Group.

3. Socio-economics

Scope

The DSG's socio-economics role comprises participating in and overseeing the operation of site and national NDA socio-economic programmes, and more generally working with stakeholders to secure the long-term future of the community. Socio-economics has been a primary focus for the DSG and – especially given the risk reduction on site - for most Members it will remain so.

The Energy Act 2004 requires the NDA to consider the socio-economic impacts of decommissioning on local communities. DSRL and the Cavendish Dounreay Partnership (CDP) have contractual obligations with the NDA to deliver socio economic activities. They discharge these obligations though a coordinated programme of initiatives as the Dounreay Socio Economic Alliance (DSEA). This programme is in turn subject to review by the DSG, primarily through its Socio-Economic Sub-Group (SESG).

DSG Members consider they also have a role to review and encourage NDA direct funding for projects in the community, to review and encourage the NDA and site in relation to workforce and local supply chain issues, and in the administration of the site's 'good neighbour' Communities Fund.

Sub-Group Oversight

DSEA programmes

Our observation is that SESG oversight of the DSEA programme and direct NDA funding seems appropriate and reasonably robust. There are potential conflicts of interest to manage since the SG is organised and supported by the DSRL Socio-Economics Manager but in practice the benefits of continuity and insight currently seem to more than compensate for the potential downside of the arrangement.

We have commented at length in previous reports and have nothing else substantial to add here.

Supply chains

The DSG continues to pay close attention to workforce, apprenticeships, training and supply chain issues at Dounreay. There is still an emphasis on developing the local and regional supply chains to provide jobs and investment for the short and longer term, including through stronger socio-economic tender clauses and greater weighting on the corresponding responses during assessment.

However, it was suggested to us several times during interviews that more could still be done to encourage local content in major contracts at Dounreay/Vulcan. These matters are part of the DSRL socio-economic strategy and thus within scope. The Sub-Group could set aside time at a future meeting consider what more, if anything it should do in terms of encouragement, requesting reports, and providing oversight.

Our view is that site human resources and state of labour relations on site (for instance) are operational matters and not part of the socio-economics strategy and therefore generally not within the scope of the DSG, no matter how pressing they may be for the organisations and individuals represented – except those aspects that impact on safety matters. For instance, the SRSG might seek assurances on emergency if industrial action was in prospect. Robust SESG chairing will continue to be required.

Strategic challenges

Many Members have a role on other bodies with a primary remit for regeneration matters and local infrastructure improvements, and everyone on the DSG has a view on the strategic challenges facing the region and on priorities for strategic investment. It is therefore natural that the DSG spends time discussing strategic needs and opportunities where site or NDA support might make a major contribution, albeit that the DSG usually has a supporting rather than a lead role.

However, our interviewees almost all expressed frustration that despite the best efforts of sub-group and DSG chairs, discussion still regularly drifted into areas which were outside the DSG's remit - local and regional transport issues and NHS provision for instance, or spaceports. Almost anything could be said to be relevant to compensating for losses to the economy from site closure or to attract inwards investment but that does not, we would argue, make it core business for the DSG. These things are best dealt with in other forums and if a lack of focus continues it will have a detrimental effect on the DSG's ability to discharge its core roles as well as frustrating Members and observers.

The Caithness and North Sutherland Regeneration Partnership, which includes the NDA, Cavendish Dounreay Partnership and DSRL is now fully functional and its Advisory Board includes most of the main organisations represented on the DSG. There are also a variety of forums and bodies which were not previously active - e.g. the Transport Forum.

The same organisations (and often individuals) sit on a range of committees and they all tend to 'spill over'. Also, their agendas seem to include more mutual progress reporting than might be desirable with correspondingly less time available for taking action. The DSG Socio-Economics Sub-Group is well run and should be maintained but it can still target its core remit better. Sub-group and public meeting discussions must be kept focussed.

Advocacy

Most people we spoke to said that the DSG was well-chaired and effective and that other bodies have potentially worse problems with cross-representation, cross-reporting and focus. However, a consequence is that non-core issues are raised at DSG meetings so 'something gets done' even if it is not core business as we might define it. Similarly, the DSG representatives on other bodies can have an effect. We queried why the DSG needed representation if it was a forum rather than a body in its own right but the answer seems to be, 'because it works' and we can see how it (for instance) alleviates difficulties with restrictions on councillors' ability to express positions. As the CNSRP is also having a review, some of these things may therefore be best considered jointly.

Members also made it clear to us that they continue to see the DSG as an important mechanism for stimulating and adding weight to efforts to lobby other organisations on matters of broader socio-economic importance. There have been some notable examples successes and DSG officers have been effective advocates for the community. A letter from the DSG Chair carries some weight even at Government level. It was pointed out to us that the strong list of member organisations adds credibility but this illustrates a potentially conflict between what may be the optimum 'focussed on core business' group size / membership and the combination that would offer 'maximum advocacy potential'.

So, although we have challenged members on occasions about this this advocacy role, we are not recommending it be stopped. It is understandable and likely to continue until the network of local bodies is functioning effectively, allowing the DSG as a body to reduce its role. Members simply want to do their best for the community and will use the mechanisms available to them.

Communities Fund

The Communities Fund comes from the NDA and is currently administered by DSRL in association with the DSG. Recommendations are considered by the SESG. Our impression is unchanged from 2007, that this is a useful but uncontroversial task for Members and no one raised any related issues during our interviews.

4. Communication and Consultation

Communication

As was the case in 2012, interviewees spoke very positively about the DSG's contributions in both the Communication and Consultation roles but Members still seem to find it difficult to canvas views before meetings or consultations and then feed back points arising and the results of discussions. There is still therefore sometimes uncertainty as to whether Members are representing their own points of view or those of their constituency / organisations. This remains a challenge for all the NDA's SSGs but more efforts will have to be made.

Quick circulation of a summary of public DSG meetings was introduced after our last review but the sub-groups are now the most important forum for many Members and their organisations so we suggest the Secretariat canvas views as to whether something similar needs to be done for them. Our opinion is that the minutes are very well written and work well as a reference but they do take a lot of time to prepare and Members should be asked whether the minutes of meetings have the right level of detail or whether they could be shortened,

Our previous conclusions remain true, that the DSG communications 'network' functions well and Members seem to quickly learn about events or issues of importance to them. Other stakeholders also appreciate the good communication from the DSG and the occasional 'heads up' about things that might concern them. Clearly, the Secretariat functions very effectively in this regard, and long standing relationships and understandings mean that it is a proper two-way process. The balance between letting people know early of important developments and maintaining confidentiality seems to be carefully handled.

Consultation

Consultation covers offering advice and acting as a consultation partner on emergency arrangements and specific local and national projects and strategies. Consultation is an important route for shaping NDA strategy and other factors affecting the site. The site consults less often on local technical option appraisals than it used to but there are still high level of NDA consultations to be responded to.

Interviewees continue to think that the process of picking up on, prioritising, and preparing a jointly-agreed response was well organised by the Secretariat and yielded useful results. Recent recruits with detailed technical and policy knowledge have strengthened this aspect of DSG operation. We note that comments are sometimes at a more detailed level than might be expected from an SSG but this should not be a problem if it does not become an expectation or require an unreasonable investment in preparing responses to the DSG.

Programming

The site restoration plan is undergoing substantial revision. We expect the DSG will take a close interest in the proposals which emerge and will want to understand where the future decision points are and agree and schedule any associated consultations. The DSG can be proactive about deciding what needs engagement; it need not be just a passive consumer of opportunities offered.

Our previous suggestion still stands, that the DSG should think now about its work over this period and draw up an outline long term, task-driven, programme to sit alongside the site decommissioning programme. It needs to be clear about what it wants to achieve, what needs to be done, and by when. Ruthless prioritisation may be needed at some points to match DSG workload to available resources and Members' interests.

5. Arrangements and Working Practices

Chairman & Secretariat

The feedback we received is that the DSG is generally very well chaired and that the DSG 'management team' are respected and trusted, and do a good job and make sensible use of business meetings to organise the Group's work. All our interviewees seemed to appreciate the way in which channels of communication to site and regulators are kept open, recognising that it takes time, effort and tact to achieve.

The DSG will continue to need strong chairing over the next decade. Attributes mentioned include: having local credibility; being reasonably neutral; having the time and commitment to do the job; having an eye for the significant issues; the capacity to challenge and gain the respect of site management; and the ability to liaise on behalf of the Group with public, press and key stakeholders.

That is a daunting list, but in practice no SSG Chairman covers all the tasks or needs every attribute to the same degree. They have different styles and are not all available for SSG work to the same extent. It therefore always takes a team effort from Chairman, Vice-Chairman, Sub-Group Chairs, and the Secretariat, supported by some key Members. For Dounreay/Vulcan, the Secretariat is (uniquely) able to act as a bridge between the SSG and site management.

Membership

Comments made to us during this review on membership demographics are generally similar to previous years. We do not mean to imply that no progress has been attempted, just that the challenges of involving young people, pressure groups, and the business community (for example) are inherent in the nature of SSGs unless there is a major issue e.g. 'new build' and have not changed. Interest in public service and committees of all sorts is perceived to have declined markedly within many communities.

However, the problem is becoming more acute for the DSG as several long-standing members are expected to retire from active involvement and it is not clear who will take up some key roles if the present incumbents step down.

We asked interviewees for suggestions. Unsurprisingly, no one offered a 'magic bullet' solution but some elements of a possible strategy did emerge to (a) make the most of the people the DSG does have and (b) increase the attraction of DSG membership, with options including:

- Cut the size of the group to better reflect the pool of people available.
- Minimise the demands on chairs and vice-chairs.
- Make DSG meetings more dynamic and interesting (see below).

The origins of the DSG were in emergency planning liaison and DSG representation still partly reflects this. Our observation is that some of the organisations who attend public DSG meetings nowadays may have no real purpose for being there given the current DSG TORs and focus of effort, and maybe they can be excused or allowed to become 'corresponding members' in future unless a specific issue justifies their invitation. Many of our interviewees made a point of saying that recent challenges to the NHS representative over local health policy were inappropriate for the DSG, no matter how justified local frustrations might be. If such organisations did not routinely attend, the likelihood of similar things happening would be reduced.

Community Forum & Co-opted Members

The NDA is very clear in its view, that the SSGs are community forums, of organisations not individuals, and not executive bodies. None of our interviewees specifically disagreed with this position and the DSG is generally consistent with it. Members do not vote to adopt a 'DSG view' on issues, as some other SSGs have tended to do. However, some things do follow from it that Members need to consider.

One is the role of co-opted members of the public. Clearly, they are playing a vital role in sub-groups and many prospective new members may not be part of an organisation. However, if the 'community forum of organisations' model is emphasised, there may be questions about whether co-opted members of the public should be voting members of the main DSG. Would good people be put off by this restriction if they could not be found a home in an organisation of some sort?

Also, the DSG could obviously maximise the potential pool for chair and vice-chair roles by opening them up to members of the public serving on the Group. We think there are good candidates across the SSGs but is this consistent with the NDA's model? Given the demographic challenges, our view is the DSG will need to bring people outside current member organisations into the pipeline.

The local authorities are expected by NDA to have the central role. The DSG tries to maintain the right balance between local authorities and other groups but there are challenges. For instance, councillors from the islands and further south incur significant expenses and time travelling, at a time when budgets are becoming ever more of a problem. In the absence of major concerns, attendance might be expected to continue at a reduced level or drop off further. Councils, including community councils, also have their own demographics problems, so acting to balance the DSG's demographics may actually necessitate diluting the local authority constituency.

DSG Meetings

Generally, DSG meetings are well prepared, well managed and focused on the business in hand. They remain a huge improvement on the meetings we first observed in 2007. Papers for the meetings are typically well written and available on time. DSG meetings have a decent mix of DSG business items and presentations or updates from site, the NDA, regulators etc. Sub-group reports highlight key issues and do not simply summarise sub-group proceedings.

However, most of our interviewees seem to feel the public meetings must happen as a safeguard and to give confidence to the community but in practice add very little to the work of the sub-groups and are of little value to them as Members or observers. The downside of the strong organisation is that they can sometimes feel formal and scripted. Ironically, the problem may well be that the sub-groups work too well with little unresolved on core issues so under normal circumstances the public meetings often duplicate what has already been said and discussed.

There are large number of attendees but some rarely make a significant contribution and substantial debate is not common. Where there is debate, it may be on issues outside the Group's remit as previously mentioned. The format and membership demographics are not thought attractive to (relatively) younger people in the community and recruitment outside of ex-site staff appears challenging.

We therefore agree with interviewees who suggested the time has come to take a hard look at the format of the meetings and participation in them. Some suggestions made to us for consideration include:

- Would it be possible to, say, halve the size of the Group over time? Does every organisation present need to be represented or is their involvement a legacy from the past? Is there any multiple representation that can be eliminated?
- Do all the observers need to sit at the main table throughout? The same table layout has been used, in the same room, for many years. Could something different be tried? Could some observers be part of the 'audience' to encourage more interaction between Members?
Alternatively, some SSGs have only the Chair, Secretary and presenter at the front, everyone else is together in the 'audience'. This works well for them and reinforces the idea that the SSG is a community forum, not an executive organisation, but the DSG can no doubt devise its own options.
- Can more reports be taken as read? What can be slimmed down? Can more time be set aside to debate an issue of substance?
- Must full public meetings be quarterly? In time, might the frequency drop to 4- or even 6-monthly?

Holding the public meetings in the evening and at a convenient location helps maintain attendance but we are still not clear why *every* meeting in the last decade or so has had to be held in Thurso (and why it needs specifying in the ToRs). None of our interviewees mentioned anything about the DSG rotating venues, but there have been some ideas for occasional variations. For instance, a suggestion from the last review was that the DSG might hold a meeting in Inverness once every few years which could (notwithstanding our previous comments on scope) focus on wider regional impacts and opportunities. This may attract a more varied audience and perhaps participation from more of the major stakeholders' senior staff.

Public participation

In an ideal world, more members of the public would attend, and some extra publicity and format changes would help, but in the absence of any pressing current concerns within the DSG's TORs, it still seems unrealistic to expect a step change in interest, especially among younger people (by which in this context we mean any under 40). No SSG attracts much of an audience in the absence of live concerns.

Nevertheless, could the public audience be engaged more (recognising that most are usually site management at present)? We have attended SSGs where they have been invited to do some work with members e.g. on discussing options. What might encourage people to come - would guest speakers play more of a role, to add interest, and give the meetings something that could be advertised? Another obvious avenue to explore is for the DSG to invest more time in 'outreach' and go to where its target audience are, especially if there is a current issue on which the DSG is seeking wider input.

Visits

DSG members are invited on site visits and occasionally elsewhere e.g. to see a high-security transport ship at Barrow. Participation appears relatively low.

Site visits and visits to other facilities seem to us an important aspect of the group's work and we are not clear why the take up is as low as it is. We suggest the Secretariat canvas opinion on what more might be done. Maybe visits could be opened to other members of the community, or even the media, to try and engage them in the work of the DSG, providing the extra costs to the DSG were minimal.

Buldoos Residents Group

We considered the DSG's interactions with the Buldoos Residents Group and talked to a member of that group. Separation of the BRG from the main work of the DSG still seems to have been a sensible move. We are aware that the DSG has suggested BRG's independent Chair could represent BRG at DSG meetings when they are available; this seems sensible.

The DSG feels it has on occasions put its weight behind the residents if it feels they have a valid issue and press coverage can be helpful. However, our impression is that the low level waste facilities are having a significant impact and at least some local people feel that, though they may be consulted and even listened to on detailed decisions, their interests very rarely seem to prevail.

We are not in a position to offer a view on whether the site has the balance right, so our suggestion is that DSG could set aside time for a review of the implementation of Phase 1 and plans for future phases, perhaps including a site visit since Members may not all be familiar with the facility.

6. Conclusions & Recommendations

The scope of the independent review reported here included the DSG's four main roles (oversight; socio-economics; communication; and consultation) plus consideration of its structures and working practices. The review's main conclusions are as follows.

Conclusions

The review's main conclusions are as follows.

- Many Members put in huge amount of unpaid effort and the DSG is amongst the best of the NDA's site stakeholder groups in most of the things it does.
- All our interviewees commented on how well chaired and organised the DSG and its sub-groups are. Members are generally motivated and effective.

- The membership of the Site Restoration Sub-Group has been strengthened. The Group now works effectively and offers a stronger critique of site operations. It should be retained.
- The socio-economic landscape is more complicated than it was, and other bodies now cover topics that the DSG used to address. There is widespread frustration at overlaps between the various committee discussions. The DSG Socio-Economics Sub-Group is well run and should be maintained but **must** focus on its core remit. Other bodies have similar problems and a joint review may be best.
- There have been notable successes and we recognise that Members continue to see the DSG as an important mechanism for stimulating and adding weight to efforts to lobby other organisations on matters of broader socio-economic importance. This does not make it impossible to achieve the necessary focus in its own meetings but can make it more challenging.
- Reporting from Vulcan and relationships with MOD have improved since our last review but there is still insufficient focus on its activities.
- The membership is aging and urgently needs renewal and more diversity, though this will not be an easy matter. The time may be right to move towards a significantly smaller Group.
- The public DSG meetings are a necessary safeguard but add little for most participants. Changes should be considered to the scope and format.

Recommendations

We have reported detailed comments and pointed to areas where Members could focus their attention but are content not to make definitive recommendations. As agreed, Members reviewed and discussed our report at the recent workshop and recommendations will now be developed and put to the full group.

The bullet-point recommendations we put to the workshop were therefore more general:

- **Oversight:** Resolve conflict over transport; review LLW facility implementation with Buldoo Residents Group.
- **Socio-Economics:** Review relationships with other bodies, including scope and representation. Set out clear ToRs and manage strictly to them.
- **Consultation:** Try again to improve feedback to and from member organisations.
- **Membership:** Try to improve diversity and succession. Consider reducing group size.
- **Meetings:** Review format for public meetings. Add variation, outreach, visits?

Annex A: Evaluation Terms of Reference

Terms of Reference

The Dounreay Stakeholder Group (DSG) commissions an independent external review of its operations at approximately 5-yearly intervals. This proposal is for conducting the next such review, due for completion before the DSG AGM in March 2017.

Scope

Based on the 2012 review equivalent, our proposed terms of reference are as follows:

- Attend DSG and sub-group meetings and survey the views of DSG members, DSRL leads, and other observers and stakeholders recommended by the Chair/Vice Chair. The scope will include the DSG's role, membership, representation of organisations, resources, structure and arrangements, Terms of Reference, and any changes that might help it better discharge its responsibilities.
- Review the minutes of the last 24 months' meetings and explore the balance of topics covered and the background to any outstanding commitments.
- Explore DSG members' perceptions concerning the group's focus over the next few years, recognising the flexibility of the DSG's remit to engage on a wide range of site-related issues with potential community impact but also the need to deliver its core roles.
- Explore DSG members' perceptions of their own contribution, the demands of the role, factors that help or hinder individual and collective effectiveness, and how they ensure they are reflecting the views of their respective organisations and the wider community.
- Review actions taken in the light of the conclusions and recommendations from the 2012 review.
- Prepare a report summarising the results of the above research and as appropriate making recommendations for considerations by the DSG.

Approach

We propose a three-strand approach to information gathering.

- A desk-top review of DSG meeting notes and other documents. We would discuss the appropriate list of documents with the DSG Secretary.
- Observation of the December main DSG meeting and January Sub-Group meetings.
- Separate face to face interviews with the DSG Chair, Vice Chair and Secretary and further interviews (generally telephone rather than face to face) with DSG members, DSRL leads, observers and other stakeholders.

If time permits it would also be useful to attend the DSG business meeting on 27th January but as the membership of this is the Chair, Vice-Chair and two Sub-Group Chairs this could be carried out via individual interviews.

All DSG members would be approached for an interview. The list of observers and stakeholders to be approached would be agreed with the Chair/Vice Chair.

After data gathering is complete, we propose discussing our emerging findings with the DSG Chair/Vice Chair and Secretary. The results and our commentary on them would then be summarised in a report, to be submitted to the Chair in draft for one round of comments and then formally issued. Timescales may be tight but one week will be available for comment.

The report will also update our previous commentary on the current and future role of the DSG, in relation to its evolving NDA, site and community needs (including Highland Council and the Scottish Government).

At the invitation of the DSG Chair, we would attend a follow-up meeting of DSG members (after the AGM in March 2017) to answer questions on our conclusions and recommendations and discuss potential actions in response.

Timeline

Our proposed key milestones and dates would be:

- Initial briefing with DSG Secretary (November 2016)
- Kick-off meeting with DSG Chair/Vice-Chair and Secretary (7th December 2016)
- Attend DSG meeting (7th December 2016)
- Attend Socio-Economic and Site Restoration Sub-Group meetings (January 18th 2017)
- Telephone interviews (mid-January to mid-February 2017)
- Draft and final report (27th February and 6th March)
- Attend a follow-up meeting (late March or early April)

Independence

We are grateful for the help of interviewees, but the conclusions and comments in our reports are ours alone and may not accord with those of any other party. We do not claim to be speaking for everyone and our reports need to be considered alongside members' and stakeholders' direct feedback. All interviews relating to this review would be non-attributable but direct quotes may be included anonymously in reports as appropriate.

We usually offer clients an opportunity to comment on our reports at the draft stage, to allow any misunderstandings to be corrected, to enable the client to offer additional insights, and to give an early indication of the balance of comment. However, our evaluations are independent and so we must reserve the right to include client comments or not as we judge appropriate.

Conflicts of Interest

As nuclear industry stakeholder specialists, we have over the years provided independent advice or facilitation to all the main UK government departments and agencies (including NDA), licensees (including DSRL and MOD), contactors (including AECOM), regulators, and several SSGs.

We are not aware of any conflicts of interest relevant to this project. However, we notified the DSG Chair before starting that we had been asked by DSRL to provide an independent assessment of stakeholder perceptions on a separate issue on a similar timescale. That work is now complete but in the longer term we may also be asked to advise on the implications for engagement work involving liaison with the DSG.

DC / February 2017

Annex B: Interviewees

David Flear	DSG Chair
Roger Saxon	DSG Dep Chair
Bob Earnshaw	SR SG Ch
Derrick Milnes	SE SG Ch
Alastair MacDonald	Member
Brian Mutch	Member
David Broughton	Member
Debbie Gray	Member
Deidre Henderson	Member
Donald MacBeath	Member
Eann Sinclair	Member
George MacDougall	Member
John Deighan	Member
Ronnie Johnstone	Member
Roy Blackburn	Member
Roy Kirk	Member
Tor Justad	Member
Ella Feist	Observer
Ken Dyke	Observer
Phil Craig	Observer
Sheila Hutchison	Observer
Simon Middlemas	Observer
Bill Hamilton	NDA
June Love	Secretariat