# Good Practice Guidelines for Site Stakeholder Groups (SSGs) and Local Liaison Committees (LLCs)



This Good Practice Guide was produced by the Young Nuclear Professionals' Forum and published on behalf of the Nuclear Industry Safety Directors' Forum

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#### DISCLAIMER

This UK Nuclear Industry Guide has been prepared on behalf of the Safety Directors' Forum (SDF) by the Young Nuclear Professionals' Forum (YNPF). Statements and technical information contained within this Guide are believed to be accurate at the time of writing. However, it may not be accurate, complete, up to date or applicable to the circumstances of any particular case. This guide is not a standard specification of regulation, nor a Code of Practice and should not be read as such. This Guide is produced by the Nuclear Industry. It is not prescriptive but offers guidance and in some cases a toolbox of methods and techniques that can be used to demonstrate compliance with regulatory requirements and approaches.

The SDF recognises that each site is uniquely situated, has its own priorities and varied stakeholder interests. The Guide does not present a singular view of good practice but presents elements of good practice which can be tailored to the needs of the local communities.

#### **EXECUTIVE SUMMARY**

This document sets out good practice guidelines that are applicable to a nuclear licensed site's Site Stakeholder Group (SSG) or Local Liaison Committee (LLC). This document is formed of good practice that has been sourced from a number of SSGs and LLCs, questionnaire responses and discussions in order to obtain a wide range of potentially useful practices that other SSGs and LLCs should adopt.

The SDF approached the Nuclear Decommissioning Authority (NDA) and the independent SSG Forum Chair to ask them to participate in the production of this document. As the NDA is conducting a review of the guidelines within which the independent SSGs operate in the near future, the SSG Forum did not feel it was appropriate to participate in the document production.

This document sets out areas where the SSGs and LLCs may want to consider adopting good practice and identifies a number of key recommendations that are identified as follows:

- SSGs and LLCs should establish an independent, stand-alone website for each SSG and LLC, outlining the membership and constitution of the group, forthcoming meetings and minutes of previous meetings. This will increase visibility and accessibility of the groups. Site operators should consider assisting/funding the independent website.
- SSGs and LLCs should have clear constitutions, terms of reference and codes of conduct to hold them to account and outline how they will be operated (see Appendix C for NDA guidance). These should be published on the SSG and / or LLC website to make them accessible to the relevant stakeholders.
- 3. To achieve open and inclusive dialogue the following guiding principles could be adopted:
  - SSGs and LLCs should include members that represent the demographics of the local community around the site (see Section 5 below).
  - Dialogue at SSGs and LLCs should be proactive, deliberative, and inclusive

     this could be achieved by allowing members to submit questions in advance
     of the meeting.
  - Topics should be able to be tabled by all members and time made for discussion and questions on information submitted.
  - All members have a right to be heard and should be encouraged to participate and treated with respect and courtesy.
- 4. Membership should include a diverse range of stakeholders.
- 5. Members of the public should have direct access to meetings to provide an opportunity for the SSG and LLC to hear from and benefit the local community and demonstrate transparency from the site operator. Members of the public should have the opportunity to raise questions.
- 6. The Chair should allow members of the public the opportunity to ask questions for an allocated, proportionate time following each agenda item.
- 7. Consideration might be given to the Group/Committee being chaired by two Co-chairs one from the Site Licence Company or Local Authority and an independent person (someone independent from the site licensee / authorisee and central government) to maintain the independence of the group.

# LIST OF ACRONYMS

| NDA  | Nuclear Decommissioning Authority       |
|------|---|
| ONR  | Office for Nuclear Regulation           |
| EA   | Environment Agency                      |
| IAEA | International Atomic Energy Agency      |
| SLC  | Site Licence Company                    |
| MoD  | Ministry of Defence                     |
| UK   | United Kingdom                          |
| SDF  | Safety Directors' Forum                 |
| YNPF | Young Nuclear Professionals' Forum      |
| NEDF | Nuclear Engineering Directors' Forum    |
| NIS  | Nuclear Information Service             |
| NGO  | Non-Governmental Organisation           |
| DECC | Department of Energy and Climate Change |
| LLC  | Local Liaison Committee                 |
| SSG  | Site Stakeholder Group                  |

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### 1. INTRODUCTION

Effective stakeholder engagement around civil and defence nuclear sites helps to maintain a site's social licence to operate. Nuclear sites often have a reputation of being opaque, secretive and unwilling to engage with the public. This negative reputation is actively damaging, from open opposition to the site's existence to a perceived general lack of understanding. Active engagement is key to undoing this, the nuclear industry must be open and honest, it must allow the wider community to ask questions, add value to the decisions made and act as a responsible operator.

Requirements for stakeholder engagement are outlined in a range of guidance including both the ONR and the IAEA guidance.

ONR guidance recognises stakeholder views can vary considerably. ONR welcomes hearing all views, voices and perspectives to encourage open, transparent and trusted communications and relationships between the nuclear industry, the public and other stakeholders. ONR's Local Liaison Committee (LLC) and Site Stakeholder Group (SSG) reports are issued as part of their ongoing commitment to making information about inspection and regulatory activities relating to licensed nuclear sites available to the public. For more information, please refer to the following ONR guidance:

- Safety Assessment Principles for Nuclear Facilities [1]
- Nuclear Site Licence Conditions [2]
- A guide to Nuclear Regulation in the UK [3]
- Licensing Nuclear Installations [4]
- ONR Strategy 2020-25 [5]

IAEA guidance states that involving a wide range of interested parties in the decision-making process on nuclear power programmes can enhance public awareness, understanding and confidence. This is also important for those stakeholders that do not have a direct role in making those decision. For more information, please refer to the following IAEA published guidance:

- An Overview of Stakeholder Involvement in Decommissioning [6]
- Stakeholder Involvement Throughout the Life Cycle of Nuclear Facilities [7]
- Communication and Stakeholder Involvement in Environmental Remediation Projects [8]
- Communication and Consultation with Interested Parties by the Regulatory Body [9]
- The European Union Council Directive 2014/87/Euratom [10] recognises the importance of nuclear site licence holders sharing information voluntarily on nuclear safety and its regulation (on both routine and non-routine matters) through their websites and through their respective LLCs and SSGs, and that ONR reports to and participates in these meetings.

For each major licensed nuclear site, a SSG has been established and includes local authorities, trade unions, regulatory bodies, interested local groups and members of the public. LLCs, in comparison, are predominantly in the Defence sector and have no affiliations with the NDA. For new nuclear sites, an appropriate forum should be established as soon as reasonably possible to enable local communities to have a voice in the development of the site and/or to express views as to why the location is inappropriate for 'new build'. This should be clearly aligned to formal consultations associated with developing the new facility e.g., Generic Design Assessment process. For sites under the responsibility of the NDA, guidance has been produced on how SSGs should be constituted and run. Whilst there are some differences across the sectors the good practice highlighted in this guide is applicable to both SSG and LLC groups.

Both SSGs and LLCs help to satisfy ONR's expectations for Licence Condition 11 compliant emergency arrangements. Specifically, LC11(4) states that "Where any such arrangements require the assistance or co-operation of, or render it necessary or expedient to make use of the services of any person, local authority or other body the licensee shall ensure that each person, local authority or other body is consulted in the making of such arrangements."

#### 1.1 Aim of the Good Practice Guide

Although guidance is available, the operations of SSGs and LLCs vary across the sector.

Recognising the importance of good stakeholder engagement and communication between the site operator and local community, the Safety Directors' Forum (SDF) has commissioned this report to:

- Undertake a comprehensive review of the constitution and conduct of SSGs and LLCs, including good practice and guidance on, and reviews of community and stakeholder engagement around nuclear sites.
- Review practice across existing SSGs and LLCs to identify areas of good practice and where improvements could be made.
- Conduct a questionnaire across SDF representatives and SSG and LLC members and community representatives to identify the conduct and effectiveness of the forum meetings, the extent to which the group adds value to the local community and the benefits realised and to understand the behaviours and contributions of relevant participants.
- Outline good practice that could help to improve dialogue and engagement between all parties involved in SSG's and LLCs.

## 1.2 Scope and Application of this Good Practice Guide

This Good Practice Guide is aimed primarily at the nuclear industry and is intended to consider the remit and roles, generic constitution and aims and operation of the SSGs and LLCs and draw on examples of good practice within the nuclear industry. However, other high-profile sectors outside of the nuclear industry who engage with local communities, may also find aspects of the guide helpful to them.

The guidelines have been developed from the following inputs:

- NDA Guidance to Site Stakeholder Groups 2018 [11].
- International guidance: Community Waste Management (COWAM) Roadmap for Local Committee Construction – Better paths towards the governance of radioactive waste. Published 2006 [12].
- NGO report published 2017 [13].
- NGO Principles paper [14].
- Local Liaison Committee Terms of Reference and Members Code of Conduct 2018 [15].
- NIS Report 'Raising the standard of community liaison at the Atomic Weapons Establishment' [16].
- Feedback from ONR on their participation at SSGs and LLCs [17].
- Responses to the SDF questionnaire sent to members of a variety of SSGs and LLCs and members of the ONR NGO Forum (please see Appendix A for list of respondents and Appendix B illustrating the questionnaire used).
- Websites and public material available about existing SSGs and LLCs.

It was evident during the review that not all SSGs and LLCs have independent websites and/or accessible platforms to host relevant material which made it challenging to find out about how the SSGs and LLCs are currently run. It is strongly encouraged that an independent, stand-

alone website should be established for each SSG and LLC, outlining the membership and constitution of the group, forthcoming meetings and minutes of previous meetings. This will increase visibility and accessibility of the groups.

Through the adoption of these guidelines, SSG and LLC meetings will be more consistent and could add additional value to both the local community and the site operator. SSGs and LLCs have an important role in demonstrating a site operator's openness, transparency and accountability whilst also promoting active engagement between all parties. In addition, these guidelines encourage SSGs and LLCs to be inclusive, open and transparent through extending their membership and establishing a set of principles and terms of reference.

## 2. PURPOSE OF THE SITE STAKEHOLDER GROUP

As established through guidelines and feedback the purpose of the SSGs and LLCs can be summarised as to:

- Provide an opportunity for open and transparent dialogue and liaison between nuclear site operators, other stakeholders and the local community hosting the nuclear site. This could be achieved via email, website or in-person.
- Support awareness raising, understanding and co-operation between those potentially affected by a nuclear site.
- Keep the local community informed about past, current and future operations of the site, subject to the demands of security legislation.
- Provide a forum for discussions on matters of interest to and/or raised by the local community.
- Ensure that site operator management is aware of local opinion and to provide an additional forum to respond to questions and issues concerning site operations.
- Scrutinise the site operator's general operation, activities and performance.
- Scrutinise the site operator's emergency and environmental plans.
- Invite the opportunity for open, honest, constructive conversation and feedback from all parties.

#### 3. CONSTITUTION AND CODE OF CONDUCT

Currently, several LLCs hold no accountability to the local community, or at least none are formally identified in their Terms of Reference. This includes no Terms of Reference being in place, no clear action management process, inadequate minute taking and infrequent meetings. However, there are, in some cases, dedicated websites for sharing meeting minutes, update reports or consultation documents which are viewed as beneficial.

The NDA has written guidance that outlines how SSGs associated with their sites should be constituted and run. The constitution of NDA site SSGs should be written in line with NDA guidance and be ratified by the NDA.

#### Recommendations:

- SSGs and LLCs should have clear constitutions, terms of reference and codes of conduct to hold them to account and outline how they will be operated (see Appendix C for NDA guidance). Both of which should be published on the SSG and / or LLC website to make them accessible to the relevant stakeholders.
- 2. Terms of Reference should be produced and cover how items are added to the agenda and how decisions are made.
- 3. All discussion should take place in open session and the discussion of any security classified information should be prohibited. This allows meetings to be open and information distributed to the wider public, assisting engagement, reducing uncertainty and fears and assisting with public relations.

- 4. Meeting agendas should include standing items, including a report from the site operator, a report on safety issues and issues of concern. All members should be entitled to propose agenda items for consideration.
- 5. As the need arises, consideration should be given to holding additional or special meetings to deal with issues that may fall outside the routine business of the SSG or LLC.
- 6. All members have a responsibility to consult with and report back to the community of interest that they represent. Members also have a responsibility to attend all meetings or, if not possible, send a nominated representative instead.

#### 3.1 Conflicts of Interest and Declaration of Interests

All members should be required to declare any personal interests in writing upon appointment and after every year in post. These should include former employment at the site, employment of immediate family members at the site, any financial and/or party-political interests in site operations (including involvement with contractors).

Members should also declare expenses, hospitality or gifts received because of their involvement with the work of the group on an annual basis.

The SSG and LLC Secretariat should hold a register of members' interests and at the beginning of each meeting members should declare any interests to the operations of the site, pecuniary, non-pecuniary or personal interests which relate to the business of the meeting.

Failure to do any of the above should constitute a breach of Code of Conduct by the member requiring remedial action.

# 4. GUIDING PRINCIPLES

Operations at nuclear sites have the potential for significant local, regional and national impact. Interested parties and members of the public around these sites should have the right to ask questions, receive information and engage in dialogue with site operators. Dialogue informed by a wide range of views, by broadening SSG and LLC membership, provides an opportunity to demonstrate inclusivity and add value to decision making on nuclear site issues and assist in reaching the best decision. Openness and transparency from industry, including the nuclear industry, is good for democracy and necessary to build trust and confidence.

SSGs and LLCs should act independently and not advocate on behalf of the site operator, any member organisation, or any viewpoint. The review conducted demonstrated that some SSGs and LLCs hold their meetings open to the public and allow members of the public to ask questions whilst others do not.

To achieve open and inclusive dialogue the following guiding principles could be adopted:

- Include members that represent the demographics of the local community around the site (see Section 5 below).
- Enable proactive, deliberative, and inclusive dialogue this could be achieved by allowing members to submit questions in advance of the meeting.
- Aim to build a consensus on issues relating to the site by enabling discussion topics to be tabled by all members and make time for discussion and questions.
- All members have a right to be heard and should be encouraged to participate and treated with respect and courtesy.

#### 5. MEMBERSHIP AND PUBLIC

It is important that SSG and LLC membership reflects the local community and its interests, as well as the operational status of the site and requirements of the Site License Company (SLC). The site operator will benefit from hearing a wide range of views and being seen to be open and honest, and the committee itself will be viewed as inclusive rather than exclusive.

The review demonstrated that membership of SSGs and LLCs does vary across the sector and it seems diversity and inclusion is not always evident. Specifically, some groups invite Non-Governmental Organisations (NGO's), the public and the media (with one SSG currently being chaired by an NGO) but other groups do not. The presence of invited attendees (such as the Director for Public Health at previous meetings to address heath related concerns) has been helpful according to SSG and LLC members.

It is viewed as good practice for membership to include a diverse range of stakeholders. This can include but not be limited to:

- A representative of the SLC, normally a member of the stakeholder relations team or a nominated deputy.
- Representatives of the site operators, normally the Site Closure Director/Station Manager or deputy.
- Site representatives from multiple, non-nuclear businesses that operate on the site.
- Representatives of relevant organisations such as the regulators, trade unions, emergency, health services and environmental organisations.
- Representatives from the local councils at County, District and Parish level or Community Councils from a range of parties.
- Local community groups with an interest in the site, including environmental groups and NGOs.
- Representatives from key site subcontractors.
- Director of Public Health to address concerns from members of the public.
- Local resident associations or residents with a declared interest in the site.
- Other local organisations such as businesses and the voluntary sector that are appropriately constituted.

To avoid any perception of bias, current employees of the site operator should not be entitled to be members in any capacity, other than as formal representatives of the operator or a trade union.

Members should be actively engaged in their role and should read all issued reports and related documents that are produced and issued in lieu of the SSG and LLC meeting. This means timely issuing of reports is essential to enable members to provide informed discussion at the meetings.

Consideration should be given to reviewing the length of time members serve on the groups to enable new people to join and bring a fresh perspective to the group. It can be useful to have long standing members who understand the history of a site, but ensuring a detailed induction is in place can reduce the risk of losing long-standing members. It is recommended that no individual should be a member of the group for a period of longer than seven years without a break of at least a year in between terms of membership.

Regular attendance at meetings is also important and members who do not attend four or more consecutive meetings should have their membership reviewed and be removed from the group if attendance cannot be improved.

## **5.1 Criteria for Membership**

Ensuring the correct criteria for membership is central in achieving successful, productive and valuable meetings for the interested parties. From time-to-time, new organisations may wish to become members of the SSG and LLC. Key aspects of membership criteria should be included in the constitution and be reviewed at the appropriate time.

The review highlighted that membership is generally open to all interested parties however, some SSGs and LLCs only invite selected stakeholders. It was evident that membership is often decided via a voting process as discussed in Section 5.5. As part of this election process, consideration must be given to the motives for membership since the SSGs and LLCs should not be a forum to progress any political motivations. Members should be interested in providing constructive discussion and challenge.

The following membership process was identified as good practice when admitting new member/s to the SSG and LLC:

- The SSG and LLC itself can invite new members to join via the Co-chairs.
- Any stakeholder with an interest in the site can write to the Co-chairs asking to join the SSG and LLC, setting out its credentials and the reasons why it wishes to join.

Local groups which are appropriately constituted, organise meetings open to the public, and have an interest in the site should be allowed to join the group. If existing members object, there should be an open discussion about permitting the applicant to join at the SSG and LLC meeting. The group applying to join should be invited to take part in this discussion to explain why it wishes to join and should have the right to respond to points made by existing members.

#### 5.2 Public

Allowing members of the public direct access to meetings provides a good opportunity for the SSG and LLC to benefit the local community and demonstrates transparency from the site operator.

As outlined earlier, SSGs and LLCs should not discuss issues that involve sensitive nuclear information or could cause security issues to prevent the public's attendance. There should be no requirement for security clearance as a condition of membership of the group. It was clear during the review, that members of the public have been prevented from attending meetings in the past due to security measures and membership of local council representatives has been used as a reason to deny the public access to the meetings. It should be possible to hold meetings in the public domain, provide an opportunity for members of the public to submit questions prior to the meeting and contribute opinions to the discussion at suitable points in the proceedings.

Attendance should also be open to the press to enable them to understand and report freely on what is happening on the site. The presence of the press can assist in disseminating information to the public about the SSG's discussions and on-site matters.

The Chair should consider allowing members of the public the opportunity to ask questions for an allocated, proportionate time following each agenda item.

## 5.3 Role and Responsibilities of Members

To ensure roles and responsibilities of members are clearly understood and adhered to, the responsibilities of members should be monitored by the Secretariat and enforced where possible by the Co-chairs and/or Deputy Chair.

The guidance below sets out the role and responsibilities of members:

- You represent your organisation or 'community of interest' actively on the SSG and LLC, including consulting them beforehand on major agenda items and asking questions on their behalf.
- You formally update your organisation or 'community of interest,' after SSG and LLC meetings, either verbally or in writing.
- You attend every SSG and LLC meeting, where possible, or send a nominated representative.
- You read papers circulated in advance of SSG and LLC meetings.
- You update other SSG and LLC members promptly after representing them at another meeting.
- You will adhere to the SSG's and LLC's Constitution and Code of Conduct.

## 5.4 Decision Making

Given that an SSG and / or an LLC is not an executive body, voting should be avoided except on matters that require formal resolution i.e., changes to the Constitution, the election of the independent Co-chair/Deputy Chair and the admission of new members.

A list of organisations that have a voting member should be detailed in the Constitution. For votes on other matters, a simple show of hands should be sufficient.

Decisions should be made on a consensus basis by members of the Group. If this is not possible, the position of the Group should be decided by a majority vote on an exceptional basis. Minority positions should be recorded.

## **5.5 Election Voting Process**

The Secretariat should inform members at least one month before the meeting detailing the purpose and the process of the elections to appoint the independent Co-chair and a Deputy Chair.

Each Member is entitled to one nomination per position. Nominees must be SSG and LLC Members and should consent to their nomination. If only one named nomination is received, the person nominated shall be deemed to have been appointed and no election will be required.

An anonymous ballot vote should be held at the next meeting. Postal votes shall only be used in exceptional circumstances by prior arrangement with the Secretariat. Elections will be decided on a simple majority basis.

## **5.6 Wider Community Engagement**

The review highlighted that occasionally, the SLC may undertake wider engagement with the community. In such instances, the SLC should inform the SSG and LLC and engage with its members.

The SSG and LLC should not act as a replacement for conducting wider engagement recognising it is a valuable tool to help promote such activities.

#### 5.7 Co-chairs

Where an SSG or LLC has adopted a Co-Chair model it is suggested that one of them should be the site operator's representative or a Local Authority representative and one should be independent of the site operator and central government. The independent Co-chair should be elected by members of the group.

The Co-chairs should be reappointed at regular intervals and neither should hold office for a period of more than three years. In the interest of maintaining independence and avoiding a potential conflict of interest, the independent Co-chair's post should be unremunerated, however, the payment of expenses incurred should be offered.

The Co-chairs should take joint responsibility and accountability for:

- Upholding the SSG's and LLC's Constitution in its entirety.
- Respecting the boundaries of SSG and LLC business.
- Forward planning to ensure that agendas meet the needs of stakeholders, SSG and LLC members, the site operators and NDA in the context of SSG and LLC objectives.
- Managing SSG and LLC meetings to ensure that a balance of views is heard and that all members can contribute to discussions.
- Liaising with the Secretariat to enable the development of both new and existing members through appropriate training, site visits and other support.
- In conjunction with other nominees, representing the SSG and LLC at national level and in other meetings as needed.
- Circulating updates to SSG and LLC members from any relevant meetings they attend.
- Ensuring subgroups update the full SSG and LLC meeting, with an opportunity for discussion.
- Reviewing SSG and LLC performance and operation at least every three years with the SLC, SSG and NDA where appropriate.
- Assisting the Secretariat in assessing SSG and LLC activity requirements for the year ahead.
- Considering with the Secretariat how best to provide for smooth succession of the Co-chair post.
- Calling a bespoke meeting if required.

In considering the selection of an independent Co-chair, the SSG and LLC should consider qualities such as independence, local reputation, experience in chairing groups of this sort and having the time, interest, and willingness to fulfil this demanding role.

#### 5.8 Secretariat

Secretarial support might include:

- Administering SSG and LLC meeting dates, venues and refreshments.
- Reimbursing agreed out-of-pocket expenses for members on SSG and LLC business
- Booking travel tickets and accommodation for members on SSG and LLC business.
- Administering expenses for the independent Co-chair and Deputy Chair.
- Arranging minute-taking and, where applicable, simultaneous translation into Welsh.
- Promptly circulating and publishing minutes from SSG and LLC meetings to members and wider interested parties, including an Executive Summary of key bullet points that members can pass on to their organisation.
- Managing and updating the relevant website.
- Circulating relevant papers to members promptly, including communications from relevant external bodies: e.g., the Office of Nuclear Regulation (ONR) and the Environment Agencies.
- Organising inductions for new SSG and LLC members.

- Organising biennial (i.e., once every two years) site visits for SSG and LLC members or if there is a business need identified by the NDA or SLC.
- Liaising with the Co-chairs and with adjacent sites (where appropriate) to ensure that relevant issues are adequately covered on SSG and LLC agendas.
- Maintaining a register of interests of members.

The site operator should provide secretariat support or funding for administering meetings effectively.

Members are encouraged to submit agenda items for consideration to the Secretary of the Committee six weeks prior to each meeting. Short notice requests which are deemed to be urgent will be dealt with under Any Other Business.

#### 6. INFORMATION VOLUME AND FORMAT

Throughout the review, it was apparent that some SSG and LLC meetings are not always accessible and, in some cases, not comprehensible due to the extensive use of acronyms; particularly for those who do not work in the nuclear industry. Meeting minutes are also not always uploaded to their relevant websites in a timely manner.

To encourage accessible and inclusive meetings, meeting minutes should be detailed with definitions of acronyms used and subsequently uploaded to an appropriate platform. This will ensure the minutes correctly represent the meeting and can be used as a method of accountability.

The Secretariat should also challenge the organisations and individuals that submit information to the SSG and LLC to help ensure that it can be understood by those with a non-technical background and is relevant to the meeting. Prior to the SSG and LLC meetings it may be useful to send a covering letter along with pre-reading packs to the members. This promotes questions being asked and ensures all members are informed of the SSG and LLC topics prior to the meeting.

Meetings should begin with each committee member introducing themselves to ensure that members of the public are able to identify those present.

Examples of discussion topics that may take place at SSG and LLC meetings could include but not be limited to:

- Health and Safety performance.
- Planned site expansions and the possible impact to the local community.
- Regulators' reports.
- Discussion of compliance with regulations and actions to address any improvement notices.
- Site security and safety.
- Socio-economic impact and issues.
- Future development.
- Current topical events/issues e.g., COVID-19 pandemic.
- General company progress.

Questions for the Secretariat to ask when receiving discussion topic material include, but are not limited to:

- Is the information relevant?
- Does the information assist the SSG and LLC in fulfilling its purpose and remit?
- Is the information for noting, discussion or a decision?
- Can the information be presented in a more useful way for SSG and LLC members given their time constraints and technical background?

- What information would they like to be passed to SSG and LLC members' constituents?
- Is the information presented in a suitable format to easily allow this?
- Are there specific questions that merit further discussion by members' constituents?

Where sites are joint or closely adjacent and share, for historic reasons, an SSG and LLC Secretariat or relevant Communications Officer should:

- Jointly input to agenda planning with the SSG and LLC Co-chairs and allocate an appropriate proportion of time to each site, based on the needs and interests of the SSG and LLC members as well as the site operators themselves.
- Recognise that, although sites may be owned and operated by different organisations, there is significant overlap and some common services on shared sites.

### 7. MEETING LOCATION AND FREQUENCY

The review identified that the frequency of SSG and LLC meetings vary quite considerably from annually to quarterly across the sector. It was also evident that accountability and transparency is enhanced by members voicing concerns over the management of SSGs and LLCs.

To ensure a consistent approach to meeting location and frequency, the appropriate level of meetings per year should be determined by the SSG and LLC cognisant of the site's work programme. Meetings should also be adequately publicised in advance on the appropriate website, social media, newsletters and through releases to local media.

The Chairs should ensure that the time allocated for each meeting and discussion of each agenda item is appropriate. If necessary, members should be willing to provide feedback to the Chairs on the length of time they consider necessary for adequate discussion.

It is recommended as good practice that meetings should be held twice a year as a minimum. Any issues or concerns associated with operator support for the SSG/LLC should be raised with the Site Director. Standing agenda items should be introduced with a presentation from the appropriate officer.

The timings and locations of meetings should be convenient to stakeholders so that, as far as possible, they are not inhibited or prevented from attending. Meetings should also ideally be accessible by public transport and/or have suitable parking. Members should choose their mode of transport based upon what is safe, time-effective and best value for money. Meetings should be held at offsite venues that are easily accessible and eliminate security clearance as a condition for attending meetings.

It is considered as good practice for meetings to be held face-to-face in public. If web-based, meetings should be on a secure and password protected platform which is accessible and allows public interaction. Microsoft teams for example, has been found to be an appropriate platform.

The site operator should provide modest funding to enable the attendance of members of the committee representing organisations outside the government sector and to help members fulfil their role properly (for example covering reasonable travel expenses to get to meetings), including obtaining advice from external organisations and induction and capacity building to help guarantee quality of engagement by members.

The SSG and LLC Chairs should be able to choose the venue and location of meetings from a shortlist of appropriate venues identified by the Secretariat. Cost and the general suitability

should be important considerations in selecting meeting venues. As a minimum, all venues should:

- Have appropriate capacity.
- Provide seating and presentation facilities.
- Provide appropriate audio and visual equipment and catering facilities.
- Be able to receive payment by BACS or credit card.
- Be on a public transport route.
- Be accessible to people with physical disabilities.

Any sub-committees formed should similarly meet in an appropriate location. The sub-committee should consider the purpose and goals of the meeting when deciding the frequency of meetings. These are viewed as helpful to address specific topics on behalf of the whole SSG and LLC.

#### 8. COMMUNICATIONS

Communications is an important aspect of effective engagement and during the review it was evident that agendas, minutes, meeting papers (i.e., business reports, external bodies' reports about the business) and slide decks should be circulated and published in a timely manner. Both SSG and LLC communication is enhanced by having an online presence on an appropriate web platform, that is clearly signposted and / or widely communicated.

The following good practice will ensure the meetings are open and transparent and encourage inclusivity amongst members and interested parties.

As a minimum, each SSG and LLC website should be kept up to date with:

- Dates, locations and agendas of future meetings and an indication that these are open to the public.
- Past minutes and reports.
- Any documents that are used in the meetings, including copies of presentation slides.
- Full list of members and who they represent.
- Key papers of interest to the community regarding SSG and LLC business.
- SSG and LLC Constitution, Code of Conduct and Terms of Reference.
- Reciprocal links to partner websites such as Local Authorities and SLC etc.
- Other relevant reports such as ONR or EA reports and site emergency plans.

A website, whilst best practice, should not be the only method of recording information and providing feedback from LLC and SSG meetings. Other mediums such as Parish newsletters and magazines should be considered as a mechanism to provide feedback to the local community and should be published a few weeks after a meeting has taken place, and subsequently archived on parish websites. Publishing a short summary of key points from the meeting to the press could be a useful method of raising awareness of the SSG and LLC and its role.

The summary points could also be used by individual members in the newsletter of the group they represent at the meeting to raise awareness. Committee members will, of course, be able to supplement this by expressing their own views.

Site operators, regulators, emergency services, academic bodies, and other members should be entitled to provide accurate and impartial information when appropriate to members' organisations.

The site operator should consider using communications mechanisms beyond the SSGs and LLCs for broader communication and consultation with the community over significant issues.

Each committee member and interested parties represented at the SSGs and LLCs should be able to receive timely, open and accessible minutes on what has been discussed at meetings on the website. A hard copy should also be made available at the next meeting.

Contact details for key members such as the Chairs or Secretariat should be available to members and easy to access.

# 9. CAPACITY BUILDING

To ensure the effective operation of the SSG and LLC, new members should undergo an induction process that, as a minimum, should include:

- An information pack including details about the site, copies of relevant guidelines where appropriate, the SSG and LLC Constitution, Code of Conduct, Terms of Reference and any relevant SSG and LLC policies.
- Meeting the SSG and LLC Co-chairs and Secretariat to welcome them on board and clarify any questions about the SSG and LLC and its Constitution.

Having a site visit can also help new members to understand their role in the context of what is happening on site. Members should be encouraged to recognise their own needs to understand the issues that come before them. Additionally, SSGs and LLCs should identify annually any information and skill gaps that prevent them fulfilling their objectives.

#### 10. ACTION MANAGEMENT PROCESS

An action management process is commonly used amongst SSGs and LLCs and it is viewed as good practice to capture all actions formerly within the minutes and an appropriate action tracker. Actions should be summarised at the end of the meeting by the Chair and regularly reviewed.

For actions to be marked as 'complete' they must be formally closed out in the subsequent meetings.

#### 11. REVIEW OF SSGs AND LCCs

To ensure constant evolution and the opportunity for improvement, it is important for SSGs and LLCs to be reviewed. This includes providing members with the opportunity to reflect on how the SSG and LLC represents current issues and ensures changes are made as and when required. The review identified that SSGs and LLCs are not frequently reviewed and review periods vary across the sector.

It is recommended as good practice for SSGs and LLCs to be reviewed at least once every three years and/or regularly ask for feedback at the end of each meeting. A prompt for this review could be when a new Co-chair is elected. This review must involve all members, the site operator and potentially other interested parties depending on the circumstances of the site.

Community surveys can be conducted which include questions aimed directly to the public to gauge their awareness and the effectiveness of information from the SSG and LLC to the local community.

The review should cover all aspects of the Constitution, including:

- Progress against objectives.
- Membership.
- Roles and accountabilities of the Co-chairs.
- Administration and procedures.

- Information and training needs for all members.
- Website and communication.
- Secretariat support.

The results of each review should be made public on the website so that learning can be shared across all SSGs and LLCs.

SSGs and LLCs which do not meet the specified standards should have a period of one year to introduce the necessary improvements.

#### REFERENCES

- [1] Office for Nuclear Regulation, 2020. Safety Assessment Principles 2014 edition (Revision 1, January 2020). Available at: ONR Safety Assessment Principles for Nuclear Plants.
- [2] Office of Nuclear Regulation 2017. Licence Condition Handbook. Available at: <a href="https://www.onr.org.uk/documents/licence-condition-handbook.pdf">https://www.onr.org.uk/documents/licence-condition-handbook.pdf</a>.
- [3] Office for Nuclear Regulation, 2016. A guide to Nuclear Regulation in the UK. Available at: <a href="https://www.onr.org.uk/documents/a-guide-to-nuclear-regulation-in-the-uk.pdf">https://www.onr.org.uk/documents/a-guide-to-nuclear-regulation-in-the-uk.pdf</a>.
- [4] Office for Nuclear Regulation, 2019. Licensing Nuclear Installations. Available at: <a href="https://www.onr.org.uk/licensing-nuclear-installations.pdf">https://www.onr.org.uk/licensing-nuclear-installations.pdf</a>.
- [5] Office for Nuclear Regulation, 2020. Strategy 2020-2025. Available at: <a href="https://www.onr.org.uk/documents/2020/onr-strategy-2020-2025.pdf">https://www.onr.org.uk/documents/2020/onr-strategy-2020-2025.pdf</a>.
- [6] IAEA, 2009. An Overview of Stakeholder Involvement in Decommissioning. Available at: An Overview of Stakeholder Involvement in Decommissioning | IAEA
- [7] IAEA, 2011. Stakeholder Involvement Throughout the Life Cycle of Nuclear Facilities. Available at: <u>Stakeholder Involvement Throughout the Life Cycle of Nuclear Facilities | IAEA.</u>
- [8] IAEA, 2014. Communication and Stakeholder Involvement in Environmental Remediation Projects. Available at: Communication and Stakeholder Involvement in Environmental Remediation Projects | IAEA
- [9] IAEA, 2017. Communication and Consultation with Interested Parties by the Regulatory Body. Available at: Communication and Consultation with Interested Parties by the Regulatory Body | IAEA
- [10] Office for Nuclear Regulation, 2017. UK Implementation of European Union Council Directive 2014/87/Euratom. Available at: <a href="https://www.onr.org.uk/documents/2017/letter-uk-implementation-of-council-directive-2014.pdf">https://www.onr.org.uk/documents/2017/letter-uk-implementation-of-council-directive-2014.pdf</a>.
- [11] Nuclear Decommissioning Authority, 2018. Nuclear Decommissioning Authority (NDA) Guidance for Site Stakeholder Groups (SSGs). Available at: <a href="https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment">https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment</a> data/file/453949/Guidance for Site Stakeholder Groups.pdf.
- [12] Community Waste Management (COWAM), 2006. Roadmap for Local Committee Construction Better paths towards the governance of radioactive waste.
- [13] Nuclear Free Local Authorities, 2017. Nuclear Site Stakeholder Groups and Local Liaison Committees are they fit for purpose? And how should wider nuclear policy stakeholder management improve?
- [14] Nuclear Sector Site Stakeholder Groups and Local Liaison Committees Good practice guidelines.

- [15] AWE, 2018. Local Liaison Committee Terms of Reference and Members Code of Conduct.
- [16] Nuclear Information Service, Opening the Gates Raising the standard of community liaison at the Atomic Weapons Establishment.
- [17] Office of Nuclear Regulation, 2021. Observations from ONR Site Inspectors.

## APPENDIX A: LIST OF RESPONSES TO THE SSG AND LCC QUESTIONNAIRE

The following list below notes those who completed the SSG and LLC questionnaire via email correspondence:

- AWE, Aldermaston
- EDF
- HMNB(D) and Babcock Devonport
- LLWR Ltd.
- Rolls Royce
- Westinghouse, Springfield's
- NDA
- Urenco, Capenhurst
- GEHC, Amersham
- BAE Systems
- Observations from ONR Site Inspectors
- Magnox, Oldbury
- Member of the public
- Members of the ONR NGO Forum (five responses)

The questionnaire was sent to the Nuleaf secretariat who shared it with their members, but no responses were received.

#### APPENDIX B: SSG AND LLC QUESTIONNAIRE

The following questions were included within the SSG and LLC questionnaire:

- 1. What is the purpose of the SSG and LLC?
- 2. What is discussed within the SSG and LLC committees?
- 3. Are there Terms of Reference in place and does it cover how topics are added to the agenda?
- 4. Are there any sub-committees? Please state details of sub-committees.
- 5. How often does the SSG and LLC meet? (and any sub-committees)
- 6. Who is able to attend the SSG and LLC?
  - i. As members
  - ii. More generally (i.e., NGOs, local authorities, members of the public, media, etc.- please provide details)
- 7. Are there any limits around participation? Can only certain people/ members contribute/ ask questions? If a member of the public wishes to ask a question at a meeting, what do they need to do?
- 8. Who is the chair of the committee and what organisation do they represent? (i.e., licenced site/ council etc.)
- 9. Who is the secretariat of the committee and what organisation do they represent? (i.e., licenced site/council etc.)
- 10. Is there any accountability and if so, who is the SSG and LLC accountable to?
- 11. What is the SSG and LLC's process for action management?
- 12. What documents are presented to the SSG and LLC? Are these made available to the wider public and if yes, how? (Provide a link to website where appropriate)
- 13. What documents are produced as a result of SSG and LLC? Are these made available to the wider public and if yes, how? (Provide a link to website where appropriate)
- 14. Are there any behaviours/ values expected to be demonstrated by the committee members/ attendees? Is this documented anywhere?
- 15. Are there any "nuggets" of best practice you feel this SS and LLC do which could be replicated by other groups?
- 16. Is there anything about this group that you would change? Structure, frequency of meetings, topics of discussion etc.
- 17. Do you seek feedback on the effectiveness of the group from those they represent? Or feedback from those the group wish to engage with?
- 18. Any additional comments?

#### APPENDIX C: EXAMPLE OF SSG CODE OF CONDUCT

The following code of conduct for SSGs has come from the NDA Guidance for SSG's 2018 for determining best practice [11]. This should act as suggested points for a code of conduct and is both non-exhaustive and non-prescriptive. The code of conduct and behaviour should be in line with what is expected in any professional meeting.

- Respect each person both during and outside of the SSG meeting.
- Prepare for the meeting by reading the agenda and reports.
- Participate fully in the meeting.
- Listen to what others have to say and keep an open mind.
- Do not talk while others are talking allow people their say.
- Contribute positively to the discussions.
- Try to be concise and avoid speeches.
- Challenge only ideas, not people.
- It is the Chair's responsibility to bring the meeting to order.
- The Chair has right of sanction against Members.
- Have the best interests of the organisation you represent at all times.
- Be punctual.
- Send apologies to the Secretariat if you are unable to attend a meeting and, where possible, nominate a deputy to attend on your behalf.
- Turn off mobile phones and other electronic devices that may interrupt the meeting.