

# **Corporate Plan** 2025/26

### Large print



### **Office for Nuclear Regulation**

## Corporate Plan 2025/26

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May 2025

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### Contents

1.	Foreword	1
2.	Introduction to our 2025/26 Corporate Plan	7
3.	Our top strategic priorities for 2025/26	10
4.	Our strategic themes	15
	<b>Strategic theme 1</b> – Influencing proportionate improvements	15
	Strategic theme 2 – Inspiring stakeholder confidence	35
	<b>Strategic theme 3</b> – Creating a culture of inclusion and excellence	45
	Strategic theme 4 – Modernising the way we work	50
5.	Regulatory assumptions	58

### 1. Foreword

I am pleased that this Corporate Plan continues to emphasise our strong focus on implementing effective regulation and influencing high standards of safety, security and safeguards across the industry, while also setting out how we will work with our stakeholders, invest in our people and continue with our modernisation agenda.

This plan affirms the important role we play in supporting the UK government's ambition for economic growth, energy security and the drive to net zero. It recognises the central role we have in enabling civil and defence new nuclear and the importance of ensuring effective whole life cycle management.

Our commitment and ability to regulate in an enabling and agile way that supports cost-effective, efficient nuclear operations and the adoption of innovation and technological advancements means that we are ready to respond to the challenges and opportunities the year will bring. This plan sets out our clear expectations for progress in areas requiring further sustained improvements in the nuclear industry, and our regulatory efforts will focus on these. The industry must collectively address these areas, and we will work closely with dutyholders to ensure the necessary improvements are achieved and the expected high standards maintained.

We will work with industry and other stakeholders to ensure that current legacy facilities have adequate investment and appropriate plans to maintain the assets in a safe condition, and to progress clean-up and remediation. We will also focus on post operations, when nuclear plants should move seamlessly into cleanout, decommissioning and dismantling. Importantly, we will also ensure that new nuclear projects continue to give appropriate consideration to whole life cycle planning to prevent a repeat of the legacies that are being managed today.

This plan highlights a number of priorities for ONR: capability and capacity (right people, right place, right skills); funding and charging; digital modernisation; and building our external profile and influence. These priorities

2

recognise the dynamic environment we now operate in and the need for us to continually adapt in an increasingly fast-paced, changing world.

I recognise the opportunity presented by the government's independent Nuclear Regulatory Taskforce. I anticipate that it will provide ONR and the wider nuclear regulatory community with valuable insights into how we can collectively improve our regulation. Recommendations on where improvements in the legal framework may be necessary to help the industry move faster, while maintaining the high standards of safety and security that have ensured the continued protection of society in the United Kingdom will also be welcomed. To support the work of the taskforce, we have already begun to develop our thinking on potential strategic improvements.

In developing the budget, we have been conscious of the challenging fiscal environment. Last year our estates strategy and digital strategy delivered significant cashable benefits, and our teams secured a range of productivity improvements by doing things smarter and delivering more with the same resource. This enabled us to undertake new civil new build work and activities associated with High-Assay Low-Enriched Uranium (HALEU).

We have committed to deliver additional efficiencies for 2025/26 of at least 2% and will examine the pathway to achieving this, as well as further efficiencies in subsequent years, by continuing to pursue productivity improvements and doing more with the same through adopting smarter ways of working.

During the latter part of 2024 we began to develop our Strategy 2030. I had intended for us to engage with our staff and a range of external stakeholders on our future vision, mission and strategic objectives, to better inform the development of our new strategy. I have paused our Strategy 2030 development work; I believe it is sensible to wait until later in the year when the taskforce conclusions are available, as they will inevitably inform the content. Our Strategy 2025 will remain extant.

This year will see notable changes in our senior leadership. I am pleased to welcome Dr Nicola Crauford, who recently joined us as our new Chair, and I look forward to Mike Finnerty joining us in the Summer, when he will become our new Chief Executive and Chief

4

Nuclear Inspector. I will work closely with both to ensure a stable and seamless transition, for our people, the industry and our wider stakeholders, as they take up leading ONR and the delivery of this plan of work.

In my final year as ONR's Chief Executive and Chief Nuclear Inspector, I am clear that nuclear safety and the protection of workers and the public is and always will be our priority, with our strong focus on implementing effective and efficient regulation that enables safe and secure outcomes. There is much to be proud of in our work at ONR but we are not complacent about areas where we can develop, improve, and work differently, to better support the wider strategic needs of the United Kingdom.

My thanks to our staff and stakeholders, particularly in embracing an increasingly enabling and collaborative approach that has been crucial in driving progress and upholding continued high standards across the nuclear industry. By working together we have embedded positive, sustainable outcomes that have ensured the continued protection of society over many decades.

5

My particular thanks and gratitude go to ONR's people, who are vital to delivering the commitments in this plan. It is their enduring expertise, professionalism and dedication to public safety and security that makes us the internationally recognised, effective nuclear regulator that we are. It is because of them that we are able to influence and deliver effective outcomes on behalf of the public.

#### **Mark Foy**

**Chief Executive and Chief Nuclear Inspector** 

### 2. Introduction to our 2025/26 Corporate Plan

We are the UK's independent nuclear regulator for nuclear safety, security, safeguards, and conventional health and safety at Great Britain's 37 licensed nuclear sites, alongside the design and construction of new nuclear facilities, including the supply chain. We also regulate the transport of civil nuclear and radioactive materials by road, rail and inland waterways. You can find out more <u>about us</u>, <u>our structure</u> and <u>our regulation</u> on our website: <u>onr.org.uk</u>.

This year will bring a range of challenges that we will meet as a strong and trusted regulator, from the impacts of spending review settlements on the industry and the major ambitions for new nuclear across both civil and defence, to lifetime extensions of the existing reactor fleet. We are confident that our regulatory approach balances holding industry to account whilst enabling it to innovate and grow.

We recognise our role in actively supporting economic growth and we do this principally through our enabling approach to regulation; providing expert advice to

dutyholders, being ready to regulate new projects; being open and responsive to innovation and new ways of working; and maintaining public confidence in the safety of new technologies by our independence from government. Our principles of open access and early engagement allow developers interested in UK new nuclear projects to have early access to our expertise, helping to inform their business decisions. Doing so helps enable investment projects to generate both regional and national economic growth.

We support the UK's strategic ambitions for energy security, national security and the role of nuclear in a sustainable future. We welcome and are ready to work with the recently announced independent Nuclear Regulatory Taskforce; recognising the opportunity it presents, we are keen to understand from the taskforce how we can both improve and maximise our contribution to a safe and secure nuclear industry, the efficient deployment of new nuclear, and UK economic growth.

This Corporate Plan is the final annual plan to support delivery of our <u>Strategy 2020-25</u> commitments. All key activities across our strategic themes align with our\_<u>Organisational Effectiveness Indicator (OEI) Framework</u>,

which measures our performance and progress against our strategic intent. It also provides an evidence base to assure our Board, government, and the public of the efficiency and effectiveness of our regulation.

Our budget to deliver our 2025/26 Corporate Plan is £110.7m compared to our 2024/25 final outturn expenditure of £105.6m; the £5.1m variance is mainly driven by progression of ongoing GDA programmes, which is expected to increase significantly in 2025/26. ONR has absorbed other increases within this budget through the identification of cost savings and efficiencies and the budget is challenging, recognising the current fiscal environment. It reflects the regulatory planning assumptions agreed by our Board and government, set out in the Appendix, and the resources required to deliver this year's commitments in line with our strategic intent.

The long term direction and ambition of ONR will be influenced by the work of the independent Nuclear Regulatory Taskforce and its conclusions. Publication of our Strategy 2030 will be held in abeyance until its vision, mission and objectives can be informed by the insights offered by the review. Our Strategy 2025 will therefore remain extant.

## 3. Our top strategic priorities for 2025/26

Our robust, effective and enabling regulation remains at our core and we will continue to drive demonstrable improvements at sites in significantly enhanced or enhanced regulatory attention, and to influence the long-term improvements identified in the Chief Nuclear Inspector (CNI) report themes. To support our regulation we have identified the following four priorities.

### P1 Priority 1– Capacity and capability

Having the right people with the right skills in the right place to safely deliver UK nuclear ambitions now and in the future.

### P2 Priority 2 – Funding and charging

Improving our funding arrangements to ensure they are appropriate whilst implementing a simplified charging approach to provide the flexibility we need to invest in our future.

### **P3** Priority 3 – Digital modernisation

Making the best use of available technology, providing the best tools for the job as a modern regulator.

## P4 Priority 4 – Building external profile and influence

Carrying out targeted work to ensure our role and impact is well understood and valued, influencing effectively to ensure the best outcomes for nuclear safety and growth, domestically and internationally.

## Strategic risks

Our systematic approach to the identification and management of both strategic and operational risks enables timely and informed decision-making across the organisation. Our Risk Improvement Group, Senior Leadership Team (SLT) and Audit and Risk Assurance Committee (ARAC) form the organisation's risk governance structure ensuring effective risk oversight and scrutiny.

Our <u>risk appetite statement</u> sets out the level of risk that ONR is willing to accept in pursuit of its strategic objectives across individual risk categories. These are reviewed annually by our Board, providing the context for making well-considered decisions in particular areas.

This plan is informed by the four top strategic risks below, agreed by ARAC and approved by our Board. They are potential threats to our ability to deliver our strategic objectives, should they not continue to be proactively managed and mitigated through associated activities and actions.

- High turnover in senior leadership positions leading to organisational instability – significant simultaneous change in personnel at Senior Executive and Board level could lead to organisational instability and disruption, impacting staff morale, motivation, focus, delivery and effectiveness.
- 2. Insufficient organisational capability a lack of workforce capability could result in the inability to deliver ONR's strategy and regulate efficiently and effectively, leading to strategic outcomes that are diluted, delayed or not achieved, resulting in reduced stakeholder confidence due to ONR's inability to maintain high standards of safety and performance across the nuclear sector.
- 3. Ineffective funding model there is a risk that ONR's funding arrangements fail to ensure adequate financial provision to support the current business model, or provide sufficient flexibility for it to invest in continuous improvement and preparatory activities necessary to ensure it remains current, fit for the future, and able to regulate an increasingly dynamic and evolving industry.

4. Ineffective knowledge management – due to the absence of effective knowledge management systems and practices critical information could be lost, resulting in a decrease in operational effectiveness and impaired regulatory and organisational decision making.

## 4. Our strategic themes

## **Strategic theme 1** – Influencing proportionate improvements

Our core focus remains on protecting workers and the public. We do this by ensuring that current and future nuclear licensed sites and other dutyholders in Great Britain conduct their operations safely and securely in accordance with the law, and that they can account for and control relevant nuclear material safely and securely.

In 2024 we invited a sample of those we regulate to participate in a stakeholder survey. We received over 150 responses, with more than 90% of participants expressing confidence in ONR delivering its mission – a strong endorsement for our work. The majority of participants also affirmed our proportionate approach to regulation. But we are not complacent and we will continue to work constructively with industry in support of its goals, provided safety and security are assured, through our risk-informed and intelligence-led approach to targeting resources and activities across our purposes.

### **Chief Nuclear Inspector (CNI) themes**

Nuclear site health and safety (NSHS) and cyber security remain as CNI themes for this year, as set out in the current <u>Chief Nuclear Inspector's annual report on Great</u> <u>Britain's nuclear industry</u>. We will maintain focus on our regulatory activities in these areas and expect to see continued industry-driven improvements:

• NSHS: Our sustained attention on NSHS remains essential for the industry to deliver tangible improvements that protect the health and safety of workers. We will continue to progress the implementation of the NSHS strategy, launched in 2024, and complete our programme for reinforcing our capability and capacity in construction site health and safety. We will also roll out enhanced training programmes and experiential learning on NSHS for all our inspectors. P1 Cyber security: Our priorities for cyber security are aligned to cross-sector commitments under the <u>2022 Civil Nuclear Cyber Security Strategy</u>. We will maintain our enhanced focus on cyber security and will complete our in-depth assessment of the industry's risk management and cyber protection capabilities; our thematic interventions targeting leadership and governance across our dutyholders will ensure cyber security remains a strategic and board-level priority.

Our CNI themed inspection on climate change included site-based regulatory inspections and dutyholder selfassessments to provide assurance on the continued adequacy of industry's arrangements to ensure appropriate safety levels in the face of climate change impacts. The full CNI report will be published in 2025, presenting a comprehensive and informed picture to the industry of its current resilience to climate change.

As well as securing increased industry attention and effort on these themes, the <u>CNI Annual Report</u> also sets out our regulatory priorities. These reflect ongoing highprofile programmes across our regulatory purposes to ensure we continue to influence proportionate improvements across the nuclear estate.

17

### **Regulatory focus**

As we prepare for our Strategy 2030, we will engage with industry and other stakeholders to ensure that legacy facilities have adequate investment and appropriate plans to maintain assets in a safe condition and allow timely decommissioning and dismantling. We will focus on post operations, when nuclear plants should move seamlessly into cleanout, decommissioning and dismantling. We will also ensure that new nuclear projects continue to give appropriate consideration to whole life cycle planning to prevent a repeat of the legacies that are being managed today.

We will continue to assess licensee safety cases and security plans to make proportionate, targeted, and balanced decisions that recognise the risks and challenges faced. Our specific focus will be on ensuring improvements are made at sites in enhanced or significantly enhanced regulatory attention levels (RALs).

Sellafield Ltd remains a high regulatory priority due to the historical and ongoing high hazard nature of operations on the site. We continue our regulatory focus on influencing timely hazard and risk reduction activities at legacy facilities across the whole of the site, which remains in enhanced attention, and the First Generation Magnox Storage Pond, Magnox Swarf Storage Silo, Pile Fuel Cladding Silo and Special Nuclear Materials (SNM) facilities, which are in significantly enhanced attention, as well as cyber security.

We have also agreed a future safeguards approach with government, the International Atomic Energy Agency (IAEA), NDA and Sellafield Ltd. This will deliver the UK's international safeguards policy outcomes while ensuring Sellafield Ltd progresses key projects to ensure longterm safe storage of plutonium at the site's two dedicated storage facilities.

The HALEU project, announced in 2024, is the government's ambition to influence global energy market stability, boost energy security and provide reliable and affordable energy for the UK. Urenco was awarded government funding to build a uranium enrichment facility with a target of producing fuel by 2031 for both domestic use and export. We will provide regulatory oversight, advice and guidance to Urenco to support the government plan for the UK to be the first European nation to produce advanced nuclear fuel to supply power plants both at home and abroad. For operating nuclear power stations, in addition to safety case assessments in support of new and upgraded facilities, lifetime extensions and end of generation, we will continue to influence the delivery of sustained improvements across the nuclear fleet. Ongoing regulatory oversight of the effective management of the UK's four remaining Advanced Gas-cooled Reactors (AGRs) will be required, following EDF Nuclear Generation Ltd's (EDF NGL) decision to extend their operating lifetimes. We will continue to undertake targeted and proportionate assessment of the key safety cases and protective security arrangements that support the AGRs' continued operation.

We will also transfer workstreams associated with Hunterston B (HNB) and Hinkley Point B (HPB) as part of the AGR transition, recognising the defueling and move into decommissioning of these reactors. Our Sellafield, Decommissioning, Fuel and Waste (SDFW) Directorate will lead on the AGR Operating Programme and AGR transfer and transition, ensuring a consistent and proportionate regulatory approach.

With ageing and degradation issues affecting strategically important defence infrastructure, we will target regulatory

effort to support dutyholders' delivery of necessary infrastructure improvements and by doing so ensure continued safe operations and maintenance of the UK's Continuous At Sea Deterrent (CASD) capability.

Although we do not have a role in the site selection process for a future Geological Disposal Facility (GDF), as the UK nuclear regulator we will support the process to ensure the prospective dutyholder understands their responsibilities as a nuclear site licence holder. We will continue to engage with communities and local authorities to ensure the public understands, and is confident in, our regulation of any future facility. We will also continue to scrutinise the viability of GDF programme timescales.

### New nuclear

Our internationally-respected regulatory regime is a key strength for the UK and enables the government's expansion of new nuclear. We deliver added value regulation that enables safe and secure new nuclear in the UK, recognising the socio-economic, environmental and energy security benefits it affords. We will provide timely advice and support to the Department for Energy Security and Net Zero (DESNZ) on civil new nuclear including affiliated arm's length bodies such as Great British Nuclear (GBN), subject to funding availability. (P2)

We will continue to deliver early engagement to support reactor vendors/developers prior to site licensing or generic design assessment (GDA). We will also continue early engagement on and in assessment of nuclear site licence (NSL) applications for the construction and operation of new nuclear reactors, and the effective regulation of the construction and commissioning of four large scale European Pressurised Reactors (EPRs) at Hinkley Point C (HPC) and Sizewell C (SZC).

We will continue to maximise the value of our collaboration with international regulatory bodies to improve the efficiency and effectiveness of regulation to facilitate the safe and secure deployment of SMR and AMR technologies.

Our work with the Environment Agency (EA) and Natural Resource Wales (NRW) as fellow regulators of civil new nuclear and Advanced Nuclear Technologies (ANTs) ensures that new nuclear power stations built in Great Britain will meet high standards of safety, security, environmental protection and waste management through the GDA process. In 2025/26 we will progress GDA step 3 of the Rolls Royce SMR Ltd (RR) small modular reactor (SMR), complete GDA step 2 of both the GE-Hitachi (GEH) BWRX-300 and the Holtec SMR-300, and look to start GDA step 1 of the Westinghouse AP300, ensuring all assessments are proportionate and demonstrably risk informed.

### Regulatory standards and guidance

We will review our guidance this year, aiming to simplify and streamline it, removing unnecessary complexity and volume. This review will promote better understanding, and ease of adoption of the good practice they highlight by our inspectors and industry alike.

We will also commission a review and update of our Safety Assessment Principles (SAPs), which will complement our continuing work on the independent review of our Security Assessment Principles (SyAPs). We will implement its findings and recommendations, undertaking appropriate stakeholder consultation and engagement on proposed changes. ONR Corporate Plan 2025/26

Our nuclear safeguards function enables the UK to meet its international safeguards obligations, and implements domestic legislation. We will continue to work with government on updating the Nuclear Safeguards Regulations 2019 (NSR19), following its post implementation review and subject to consultation on the proposed changes. We will incorporate amendments into our regulatory guidance. We will deliver subject matter expertise to support government with national projects such as HALEU, Nuclear Fuels Programme (NFP) and AUKUS (the trilateral security partnership between the United States, United Kingdom and Australia), and, subject to funding, the potential development of safeguards in UK overseas territories (Treaty of Tlatelolco).

## Innovation and our approach to regulating Artificial Intelligence (AI)

We are open to innovation both in how we regulate, and in the safe and secure adoption of innovative solutions by the nuclear industry and its supply chain across all our regulatory purposes. Our pro-innovation approach to regulating AI in the nuclear sector is set out in our <u>Approach to AI regulation policy paper.</u> It describes how our existing goal-setting and non-prescriptive regulatory regime provides a supportive environment for dutyholders to innovate, and in particular our focus on outcomes and technology neutrality to ensure the most cost-effective solutions.

We will implement our refreshed innovation strategy this year, and to support this we have established three routes to innovation as a framework for our staff, dutyholders, and other stakeholders: internal innovation cafes, expert advice panels and regulatory laboratories or "sandboxing". These provide a safe environment to explore innovative solutions and consider new technologies and novel approaches or processes prior to formal regulatory assessment. Our innovation engagement plan maximises the value of this work and enables us to proactively communicate our open stance to innovation.

Working with other national and international regulatory bodies we will continue to share information and explore further regulatory laboratory opportunities, considering improved and novel ways to assist ONR in delivering proportionate regulation to the nuclear industry. **Organisational Effectiveness Indicator 1:** Our regulatory activity drives demonstrable improvements across our purposes

#### We will:

Continue our work to ensure improvements are made at sites that are in enhanced and significantly enhanced regulatory attention. or facilitate timely return of dutyholders to a routine level of regulatory attention.

#### Key deliverables/milestones:

Sellafield Ltd. – continue to influence timely hazard and risk reduction activities at legacy facilities across the whole site, for which an enhanced RAL remains assigned, and the First Generation Magnox Storage Pond, Magnox Swarf Storage Silo, Pile Fuel Cladding Silo and Special Nuclear Materials facilities, which are in significantly enhanced RAL.

Sellafield Ltd. – complete an assessment of Sellafield Ltd. on its progress to achieve enhanced RAL for cyber security.

Sellafield's Analytical Services – having moved into significantly enhanced RAL in 2024/25, agree and actively monitor progress of the licensee's programme to support key functions to the site, support high hazard risk reduction and move to routine RAL.

We will:	Key deliverables/milestones:
	Nuclear Restoration Services (NRS) Dounreay – having moved into enhanced regulatory attention in 2024/25, agree and actively monitor progress of licensee's programme for return to routine RAL.
	Hartlepool Nuclear Power Station – having moved into enhanced regulatory attention for 2025/26, we will agree a strategy with NGL to implement and secure improvements and actively monitor progress for return to routine RAL.
	Springfields Fuels Ltd. – develop and implement a targeted intervention plan to monitor implementation of Springfields delivery programme and to enable the site to return to a routine RAL.
	Devonport Royal Dockyard Ltd. (DRDL) – complete assessment of DRDL's evidence of, and readiness to support, a move to routine RAL.
	EDF NGL (Corporate) cyber security – assess EDF NGL's evidence in delivery of improved cyber security leadership, governance, assurance, risk and vulnerability management arrangements to support a return to enhanced, then routine, RAL.

We will:	Key deliverables/milestones:
Support government's strategic	Progress step 3 of the GDA of the Rolls Royce SMR Ltd small modular reactor (SMR).
ambitions for new nuclear.	Issue GDA step 2 statement for GE-Hitachi BWRX-300 SMR.
	Issue GDA step 2 statement for Holtec SMR-300.
	Commence GDA step 1 for Westinghouse Electric Company's AP300 SMR.
	Progress regulatory early engagement with prospective UK market entrants.
	Complete government's High Temperature Gas Reactors (HTGR) Phase B project.
Continue our work to influence timely hazard and risk reduction at Sellafield.	Demonstrable progress in respect of hazard and risk reduction is observed across the Sellafield site.

We will:	Key deliverables/milestones:
Enabling ageing AGR cores to operate and shutdown in a demonstrably safe state.	Appropriate targeted and risk informed inspection, assessment and permissioning of safety cases and security plans for continued operation, defueling and lifetime extension of AGRs.
Enable transfer of the EDF NGL AGR stations to Nuclear Restoration Services.	Complete permissioning of the transfer of the EDF NGL AGR stations to Nuclear Restoration Services (NRS).
Enable the safe and innovative delivery of critical nuclear defence projects.	Complete permissioning of Rolls Royce Submarines Ltd. (RRSL) revised site licence for the Nuclear Fuel Production Plant (NFPP) at Raynesway in readiness for facility construction for future naval core capability. Assess AWE's permissioning approach, enabling their strategy for all future Capital projects.

We will:	Key deliverables/milestones:
Support government strategic ambitions for advanced nuclear fuel for new nuclear power plants.	Progress early regulatory engagement with Urenco and DESNZ to provide clear regulatory expectations and ensure readiness to deliver the HALEU project.
Deliver an integrated regulatory response to the priority themes in the CNI Annual Report to drive industry-wide ownership and progress.	<ul> <li>Publish the climate change themed inspection report on industry's consideration of climate change in safety cases.</li> <li>Publish and implement a Construction Health and Safety Regulatory Strategy, aligned with our NSHS purpose strategy, to drive strategic improvements in NSHS compliance across the sector.</li> <li>Complete programme of thematic interventions and board level engagements</li> </ul>
	to test governance arrangements and leadership of cyber security and resulting culture across dutyholder organisations.

We will:	Key deliverables/milestones:
Ensure that we deliver in our role as domestic safeguards regulator enabling the UK to meet its international obligations.	Meet all international safeguards obligations under the UK's Voluntary Offer Agreement and Additional Protocol, and international bilateral safeguards obligations under the UK's Nuclear Cooperation Agreements and other safeguards agreements.

**Organisational Effectiveness Indicator 2:** Our regulatory decisions are proportionate, balanced and unbiased.

We will:	Key deliverables/milestones:
Continue our work to improve collaboration, co-operation, proportionality, and consistency across our purposes.	Review and simplify our regulatory guidance, targeting reductions in guidance and length of documents. Commission a review and update of our Safety Assessment Principles (SAPs). Implement the findings and recommendations from the Security Assessment Principles (SyAPs) review, developing a suite of security training courses for the UK civil industry.

**Organisational Effectiveness Indicator 3:** We have a continuous self-improvement and learning culture.

We will:	Key deliverables/milestones:
Use regulatory	Demonstrate how risk-informed
intelligence to inform	and targeted engagements (RITE)
effective, strategic and	are embedded as an integral part
intelligence-informed	of our regulatory practice to inform
risk-based interventions.	effective, targeted intervention
	planning.

**Organisational Effectiveness Indicator 4:** Innovators are confident to test and deploy technology in a UK regulatory framework that embraces innovation.

We will:	Key deliverables/milestones:
We will: Embrace innovation in both how we regulate, and in the adoption of innovative solutions by the nuclear industry and its supply chain.	<ul> <li>Key deliverables/milestones:</li> <li>Implement our revised innovation strategy including:</li> <li>engaging and interacting with industry, academia and other interested parties within innovation spaces to promote, support and implement new solutions and approaches;</li> <li>developing and implementing a number of pilots that use AI across regulatory activities and processes to assess the benefits and inform the approaches to wider roll-out; and</li> </ul>
	<ul> <li>rolling out internal training to ensure ONR remains open to innovation.</li> </ul>

# **Strategic theme 2** – Inspiring stakeholder confidence

It is key to public confidence that we engage with and take account of views from a diverse range of stakeholders, learn from others, and work openly and transparently.

We will ensure that our voice is more impactful to add further value in the nuclear industry and wider energy sector to more boldly influence and effect improved outcomes, and more clearly communicate what we do and why at relevant key moments. (P4)

As we develop our new Strategy 2030, we will seek input from staff and consult with licensees, other dutyholders, non-government organisations, government bodies and others to ensure our future ambitions are transparent. To support this and our broader work, we will develop and launch a new 2030 Communications and Engagement Strategy that will improve and better connect our communications and promote our strategic narrative. P4

Our strong relationship with government, particularly the Department for Work and Pensions (DWP), DESNZ

and Ministry of Defence (MoD), will ensure that our expert advice relating to the development and review of government policies is heard, provided when requested, and at the earliest possible stage. This will include policy development and reviews on: National Policy Statement for siting; Nuclear Industries Security Regulations 2003; implementation of the International Commission on Radiological Protection (ICRP) dose coefficient; amendment of Nuclear Safeguards Regulations 2019; and the implementation of the Treaty of Tlatelolco, which will require safeguards regulation in the relevant British Overseas Territories. One of the most significant projects requiring policy support and regulatory input is our work with DESNZ and MoD to support government ambitions on the HALEU project and Nuclear Fuels Programme (NFP), subject to funding. (P2) P4

Our work with government will also seek to develop ONR's strategic policy positions on the prioritisation of new nuclear, As Low as Reasonably Practicable (ALARP), and the future funding of ONR. (P2)

Our established and developing policy relationships with external stakeholders, including Trade Unionists for Safe Nuclear Energy (TUSNE), Nuclear Industry Association (NIA), National Energy System Operator (NESO) and other regulators such as the UK's environment agencies, Health and Safety Executive (HSE), Ofgem and defence regulators, will allow us to provide high quality policy advice and improve regulatory effectiveness across the sector. P4

We will maintain our leadership of, and engagement with the UK Health and Safety Regulators Network, which provides an effective forum to share learning with, and enable a common voice for, UK health, safety and environmental regulators. This will lead to more effective, efficient and consistent regulation for the benefit of the public, industry and government. (P4)

We value highly stakeholder feedback from multiple sources to inform and improve our effectiveness and impact. To maintain trust and confidence in our regulation, we will host our Annual Conference to further strengthen relationships with our stakeholders through effective engagement and feedback. We will also review and build on the commitments set out in our Openness and Transparency Policy, and conduct our annual stakeholder survey, responding to the findings and identifying necessary actions to address feedback. We will also focus on maximising the benefits of our new website to further enhance both the user experience, and the accessibility of our information to the public.

Our regular non-government organisations (NGO) engagement has engendered and fostered openness and transparency and we intend to build on this by continuing our twice-yearly NGO forums. We will continue to use these and other stakeholder forums to enhance our dialogue with interested stakeholders on regulatory processes and practices, including topics of specific interest. P4

Internationally, we will retain our leadership and influence through our targeted engagement with key international organisations such as the IAEA, Nuclear Energy Agency (NEA), Western European Nuclear Regulators Association (WENRA) and our bilateral/multilateral engagement with international governments and regulatory partners. P4

At the request of the UK Government, we will lead the UK delegation to and participate in the Joint Convention on the Safety of Spent Fuel Management and Safety of Radioactive Waste Management Review Meeting. Our participation in this significant and high-profile work provides confidence that the UK is meeting its international obligations. We will also continue to share knowledge with and learn from other international nuclear regulators on areas of common interest and play a key role in developing and influencing international standards, guidance and relevant good practice across all our purposes, which directly inform and are incorporated into the UK regulatory system. (P4)

To support this, we will update and publish our new Strategic Framework for International Engagement 2030, in support of our Strategy 2030, to ensure we remain suitably positioned, agile and able to meet the challenges as the global nuclear industry changes. (P4) Organisational Effectiveness Indicator 5: We engage with UK and international stakeholders to improve the effectiveness of our regulation and to inform UK policy.

We will:	Key deliverables/milestones:
Maintain stakeholder and dutyholder confidence in our regulation of the industry.	Launch Strategy 2030 formal consultation. Host annual stakeholder conference.
	Hold two NGO Forums, and bespoke workshops where required.
	Launch 2025 stakeholder survey and review and respond to its findings.

We will:	Key deliverables/milestones:
Learn from domestic regulators, other UK stakeholders and internationally to improve our effectiveness .	Maintain leadership of, and engagement with, the UK Health and Safety Regulators Network to share learning between UK health, safety and environmental regulators.
	Maintain leadership and participation in key international organisations to influence the development of international standards and guidance ensuring right outcomes for UK.
Inform UK nuclear policy.	Provide timely advice and support to government on the development, or review, of government nuclear policy at the earliest possible stages.
	Working with government to agree policy positions on new nuclear, ALARP and ONR future funding.

We will:	Key deliverables/milestones:
Continue to work with international regulators on areas of common interest and to influence standards.	Evidence how we effectively influence national and international practice and learn from our stakeholders to improve our impact and reduce regulatory burden.
	Maximise the value of overseas regulatory work through multilateral collaboration with international regulatory bodies to enable the sharing of regulatory assessments and facilitate greater efficiency.
	Review and publish Strategic Framework for International Engagement 2030.

#### **Organisational Effectiveness Indicator 6:** We are transparent and accessible to our stakeholders and the public.

We will:	Key deliverables/milestones:
Deliver engaging and accessible publications.	Publish corporate publications that meet accessibility guidelines, including:
	<ul> <li>Strategy 2030;</li> </ul>
	Corporate Plan 25/26; and
	<ul> <li>Annual Report and Accounts 24/25.</li> </ul>
	Publish Chief Nuclear Inspector's Annual Report 2025.
	Publish Climate Change Themed Inspection Report 2025.

We will:	Key deliverables/milestones:
Support effective openness and transparency about our growing portfolio of regulatory activities.	Publish Communications and Engagement Strategy.
	Publish clear, accessible information and engage openly and constructively.
	Review and build on our commitments set out in our Openness and Transparency Policy.
	Complete the annual review of our publication scheme.
Enhance the accessibility of our information to the public and user experience.	Continue to use NGO and other stakeholder forums to enhance our dialogue with interested stakeholders on regulatory processes and practices, including topics of specific interest.

### **Strategic theme 3** – Creating a culture of inclusion and excellence

Continuing work carried out in 24/25, our sustained focus on investing in our staff will continue to build capability and resilience and promote wellbeing in our great teams.

This is underpinned by our inherent focus on diversity, inclusion and excellence. Our people are our greatest asset and our ambition is to be an employer of choice to attract and retain the very best.

ONR is recognised for its professionalism, capability, expertise, and effectiveness as an independent regulator. In the face of a fast-moving external environment and industry, however, we must ensure we remain agile, resilient and effective to protect the long-term delivery of our mission. Our focus remains to grow and diversify our talent pipeline, and develop and build the capability of our people to work effectively, efficiently, and consistently. To ensure we remain an attractive employer in a competitive recruitment market for our future and existing workforce, we will further improve our succession planning and talent management processes and approach, and undertake a targeted review of our Pay and Reward, including considering alternative options for our pay structure. P1

Our training offer to staff through our Academy, which includes our structured programme for regulatory specialists, will look to further improve both technical and core skills, and leadership and management capability. Further work will continue across the organisation to understand our learning needs and address skills gaps to build our capability. P1

We will continue to support underpinning cultural change activities and progress issues identified in the AMBS Cultural Survey – this will include a staff survey and delivering Leading ONR events to support our leaders and influencers to deliver the cultural change we want for our people.

The nuclear sector's demand for skills and resources is set to grow rapidly during the coming decades, with employers already experiencing talent shortages that indicate current demand outstrips supply. The skills challenge will increase as the industry's anticipated growth becomes a reality, ensuring a timely supply of skilled people must be an area of sustained focus, at a regional and national level, now and into the future.

Building on our commitment in 2024/25, we will continue to support the delivery of the National Nuclear Strategic Plan for Skills (NNSPS) and Destination Nuclear campaign initiative – all our vacancies will be part of this campaign on an ongoing basis. We will also build on our existing networks such as Women in Nuclear UK (WiN UK) and National Skills Academy for Nuclear (NSAN) to influence and engage in initiatives that seek to improve industry-wide outcomes in skills, capability, diversity, and inclusion. P1

#### Organisational Effectiveness Indicator 7: We have technical competence at our core.

We will:	Key deliverables/milestones:
Influence a joined- up, industry wide approach to building and sustaining a resilient and capable workforce for the future.	Maintain our support to the nuclear sector-wide approach to delivering the capacity and capability to meet projected needs.
Strengthen workforce flexibility, resilience and capability.	Conduct an impact review to assess the effectiveness of the ONR Academy activities. Conduct an organisation-wide learning needs analysis that identifies priority areas and addresses strategic gaps. Review and update the regulatory competency framework, ensuring we have the foundations to develop people with the right skills for now and the future to safely deliver UK nuclear ambitions. Embed and enhance our succession planning and talent management processes and approach.

**Organisational Effectiveness Indicator 8:** We exhibit strong leadership and an inclusive culture that embraces change.

We will:	Key deliverables/milestones:
Continue to shape a culture of inclusion and excellence.	Deliver 'Leading ONR' events to align organisation and leadership on culture. Deliver staff survey and review findings. Continue to embed diversity and
	inclusivity initiatives to ensure that every colleague feels valued and is treated in a fair and equal manner.
	Complete two assurance exercises to assess the implementation of our safety management system controls across ONR.
	Embed our new health and safety training programme to build health and safety capability across all our purposes.

## **Strategic theme 4** – Modernising the way we work

Our focus for this year is to deliver a programme of new and continuous improvement activities to simplify processes, identify and implement efficiencies in our ways of working, and make better use of technology.

We will focus more on cultural elements to ensure that delivering sustainable value becomes embedded into our thinking and ways of working including establishing an efficiency network and publishing a revised efficiency framework.

Synergy is the cross-government department programme that will change the way HR, finance and procurement services are delivered, meaning that we will transition to a new service provider. We will work closely with DWP to define its potential impact on ONR systems, which will require significant cross-ONR resource, and implement any changes to our systems, policies and processes to align ourselves with wider government arrangements. We will also use this project to identify opportunities and efficiencies to streamline and modernise our processes. Having seamlessly delivered the Information Technology Service Provider (ITSP) project, we will take an active role in key strategic change projects, including the introduction of SharePoint and the Synergy, to embed and build on our service improvements.

The delivery of our WIReD (Well-Informed Regulatory Decisions) system in 2023 was a significant innovation, bringing our key regulatory processes and associated information under a single platform. We have further developed it with design and proof-of-concept work completed for security and functionality enhancements. However, to ensure it remains a suitable tool to support regulation, we will focus on the user experience and user interface, and expanding its capability to include other processes to support digital modernisation. (P3)

We will develop the 2025-30 Digital Strategy with key areas to include the introduction of Artificial Intelligence (AI) and advanced analytics, creation of a data science capability, improved data literacy within the organisation and embedding the SIAM (Service Integration and Management) model. P3 Our Charging Strategy will provide assurance both that our charging regime is fit for purpose, and that we have a pragmatic, proportionate solution for the future. Having successfully improved our quarterly forecasting to dutyholders, our ambition is to maintain a sustainable, fit for purpose and comprehensive funding regime. We will consider all available funding routes, in collaboration with government colleagues and taking account of appropriate legislation, to support our regulatory activity and futureproof our financial stability with the flexibility we need to invest in the future.

We undertook a detailed zero-based review to comprehensively assess the risk landscape in which we operate, and to identify the principal risks that ONR is both exposed to and willing to take to achieve our objectives. We will further embed effective risk management across the organisation, providing robust challenge and scrutiny to ensure effective control measures and mitigations are in place and managed by respective risk owners.

In addition to providing continued portfolio and project management of ONR's strategic projects, our focus will be on increasing organisational maturity in three areas: benefits management; financial management and resource management. This will be supported by our newly established Change Investment Board to ensure that we have clear accountability for strategic change in our organisation.

We will build on activities to strengthen our emergency response arrangements and ability to manage incidents effectively, focussing on the resilience of our response capability as a Category 2 response organisation under the Civil Contingencies Act 2004. Working with stakeholders, we will practise and test these arrangements.

To ensure ONR's business resilience in the face of disruptive events we will maintain appropriate security accreditations and continue to develop resilience maturity to align with the business continuity standard (ISO22301). During 2025/26, two significant security and resilience projects are planned, along with a full-scale IT exercise to test business recovery capability and provide assurance that ONR can effectively recover in the event of a major disruptive event such as a cyber-attack. We have relocated our London office and downsized the Cheltenham and Bootle offices by approximately 40%, with each office shaped and redesigned to reflect modern ways of working and provide a vibrant and collaborative place to work. This will generate annual savings of c. £2.8m, contributing to ONR's efficiency target. We will now develop a new Estates Strategy that aligns with organisational goals and anticipates future needs, providing the flexibility to adapt. Organisational Effectiveness Indicator 9: We develop a strong organisational capability: knowledge management; tools; business continuity and emergency preparedness.

We will:	Key deliverables/milestones:
We will: Continue to deliver improvements in digitisation, IT service management and data.	Develop and implement 2025-30 Digital Strategy. Work with DWP to shape Synergy, the new shared service framework, and identify opportunities and efficiencies to streamline and modernise our processes including the use of SharePoint.
	Complete transfer support for the Safeguards Information Management and Reporting System (SIMRS) system – a critical element of the UK's safeguards system to Information, Technology and Delivery Directorate (ITDD).
Timely and effectively project delivery.	Increase PMO maturity to support our Change Investment Board.

We will:	Key deliverables/milestones:
Focus attention on the maintenance of the WIReD platform and continue to embed processes and drive benefits of WIReD. P3	Deliver further enhancements to WIReD with a focus on user experience and user interface, and expanding its capability.

#### **Organisational Effectiveness Indicator 10:** Delivery of our mission is efficient and sustainable.

We will:	Key deliverables/milestones:
Drive improvements in our charging arrangements.	Maintain a sustainable, fit for purpose, comprehensive funding regime. Consider all available funding
	routes, taking account of appropriate legislation, to future- proof our financial stability.
Mature our workforce planning approach.	Implement a revised regulatory tactical workforce planning process to support agile resource management for all activities.

We will:	Key deliverables/milestones:
Ensure office facilities meet our future requirements in light of hybrid working arrangements.	Develop a new Estates Strategy to provide flexibility to adapt seamlessly to evolving operational requirements.
Develop mature security and resilience capability.	Undertake a full-scale IT exercise to test business recovery capability in the event of a major disruptive event.
Build on our strong Environmental, Social and Governance (ESG) credentials.	Report against requirements of Phase II TCFD (Task Force on Climate-related Financial Disclosures) Compliance Framework.
	Implement Board Effectiveness Review recommendations to enhance Corporate Governance practices.

### 5. Regulatory assumptions

Our regulatory assumptions underpin the scope of our activity in terms of government policy and parameters for the work we do.

ON	IR 2025/26 Regulatory assumptions
1	There are no nuclear or significant security events within the UK or overseas that undermine or result in a significant change to ONR's planned work programmes.
2	Programmes across civil and defence proceed at declared rates and no significant regulatory concerns emerge.
3	The Nuclear Decommissioning Authority (NDA) will secure the necessary investments and resources to deliver their hazard, risk reduction, new build major projects and decommissioning programmes as planned.
4	The UK government remains committed to a GDF; the process for identifying a suitable location continues, necessary funding is secured and potential options for design assessments are advanced.
5	There will be no changes to ONR's vires to regulate new areas of scope beyond our current purposes.

ON	ONR 2025/26 Regulatory assumptions	
6	Work with DESNZ will continue on amendments to existing domestic safeguards legislation and scoping a potential new requirement for ONR to support the UK to meet international safeguards obligations in the British Overseas Territories (relevant to the Tlatelolco Treaty).	
7	The three current GDA projects complete on schedule, and two further GDA projects enter GDA this year. Additional reactor design assessment work is prioritised in discussion with government.	
8	Staff recruitment and attrition rates remain within current planning margins and ONR can continue to maintain resources and deploy (including through Technical Support Contracts) all skills in competitive market areas to meet demand.	
9	ONR's international engagements to fulfil legal, treaty and government international obligations and support our strategic priorities remain aligned with our Strategic Framework for International Engagement and are supported by appropriate funding mechanisms.	
10	Appropriate funding routes will be agreed in advance of work commencing to allow ONR to respond to requests from government.	
11	Start one new nuclear licensing project.	

ONR Corporate Plan 2025/26

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