UK Government

Ways of Working – principles to guide the application of ALARP and BAT in the nuclear industry

November 2025

Foreword

Nuclear has never been more important to the UK – helping the UK to achieve energy security and become a clean energy superpower, supporting economic growth by creating thousands of good jobs and providing the bedrock of our national security. The Government is gearing up to deliver a significant expansion in both civil and defence nuclear programmes, as well as maintaining our mission to safely manage the UK's nuclear legacy.

This Government is committed to ensuring that the right enablers are in place, including effective and proportionate regulation. Regulation is vitally important for public protection and done well it can help enable this new era for the nuclear sector in the UK. Our system is already internationally recognised for the outcomes it achieves, delivered by well-regarded regulators and responsible operators. Regulation serves an essential purpose in maintaining high levels of public, worker and environmental protection, supporting investment and innovation, and ensuring that the public continues to have confidence in the sector as it evolves and develops.

The UK's health, safety and environmental legislation is founded on the key principle that those who create risks are responsible for managing them. Industry has duties placed upon it to reduce risk to people 'so far as is reasonably practicable.' This is usually referred to as reducing risk to be as 'low as reasonably practicable' (ALARP). There is also a duty to make use of the 'best available techniques' (BAT) for environmental protection. These requirements are non-prescriptive and goal setting. They provide the backbone of an outcome-focussed approach to regulation which allows for flexibility in how compliance with the law can be demonstrated.

While outcome focused regulation has many inherent benefits in terms of flexibility, feedback from the nuclear industry has highlighted that at times it can be hard to determine and evidence these concepts in practice. There is recognition that uncertainty can contribute to increased resource requirements, potentially adding cost and delay to projects. The ability for industry participants and regulators to have more open discussions could lead to regulatory outcomes being achieved more proportionately.

The Department for Energy Security and Net Zero, the Ministry of Defence, civil and defence nuclear industry and the statutory regulators responsible for regulating the nuclear industry have come together to explore these concerns. The Department with stakeholders has identified a set of ways of working principles which may assist in applying these fundamental concepts. In doing so, we have identified one overarching principle and 9 supporting principles which, if embedded in the sector's culture, will support the application of ALARP and BAT in line with dutyholders' legal duties while maintaining regulatory independence.

By improving the way industry and regulators work together to apply the concepts of ALARP and BAT, the expectation is that costs and delays will be reduced, as a more proportionate and efficient approach to evidencing compliance is adopted. The Department encourages their adoption and will be seeking feedback as to their effectiveness.

Ways of Working Principles

Overarching Principle: Focus on optimisation and the appropriate approach to consideration of risk.

Principle 1: Open-minded and flexible approach to how ALARP and BAT is demonstrated.

Principle 2: Mutual understanding between stakeholders of the approach to making judgments on regulatory compliance and overall decision making.

Principle 3: Understanding of regulatory guidance by dutyholders, and clarity from regulators about its use.

Principle 4: Early and regular engagement between stakeholders.

Principle 5: Involvement of the right stakeholders with clear roles and responsibilities and lines of communication.

Principle 6: Clear communication between stakeholders.

Principle 7: Appropriate consideration of previous decisions where relevant.

Principle 8: Oversight of people and processes by all stakeholders.

Principle 9: Provide appropriate routes to seek clarification, second opinion or raise concerns.

Introduction

1. To keep people and the environment safe the nuclear industry, like other industries, is subject to legal limits and obligations.[1] The objective of the UK's legislative and regulatory framework is to maintain high levels of protection by managing and reducing risks and impacts, and it is regularly reviewed to ensure that it is effective and fit for purpose. This framework ensures the responsibility for managing risk and impact lies with the dutyholder, who needs to consider balance and 'optimise[2]' requirements across the different safety and environmental contexts.

2. To ensure the safety of workers and the public, the Health and Safety at Work etc. Act 1974 requires risks to be reduced so far as is reasonably practicable. ALARP is the day-to-day term used by the nuclear industry and regulators. For practical purposes, these terms are interchangeable. In most cases this is approached by evidencing and applying established relevant good practice and standards.

3. The Environment Agency's duty is to protect the environment as a whole while supporting sustainable development. The Environmental Permitting (England and Wales) Regulations 2016 protect the public and the environment from waste disposals and discharges under normal operation. The Environment Agency must exercise its relevant functions to ensure that all exposures to ionising radiation of any member of the public and of the population as a whole resulting from the disposal of radioactive waste are kept as low as reasonably achievable, taking into account economic and social factors. This is given effect using the concept of best available techniques (BAT), which is the means an operator uses in the operation of a facility to deliver an optimised outcome, reducing exposures to as low as reasonably achievable. In practice the assessment of BAT includes the consideration of environmental factors, and this is recognised in international and domestic guidance and UK policy for radioactive discharges and managing radioactive substances and decommissioning.[3]

4. Nuclear sites may also be subject to other similar requirements to use BAT, for example industrial installations with specific types of activity must also use BAT to prevent or reduce emissions to air, land, and water.[4]

5. Dutyholders are required to comply with all the relevant legal duties, wherever and whenever they apply. Regulators of nuclear sites are required to enforce these duties and comply with the Regulators Code and Growth Duty. Regulatory dialogue is an important contributor in enabling optimised outcomes.

[1] For the purpose of this document "safety" means the safety of the public, workers, third parties affected by the work being undertaken and the environment)
[2] This term is being used in a generic sense. The term is also used for the more specific case of reducing radiation exposure to as low as reasonably achievable taking social, economic and environmental factors into account (ALARA).
[3] Managing Radioactive Substances and Nuclear Decommissioning: UK policy framework.
[4] Noting that BAT for non-nuclear processes uses the UK BAT system which establishes techniques through evidence led, collaborative approach - UK BAT - GOV.UK

6. Outcomes based regulation is technology neutral and enduring, avoiding complex prescriptive regulations requiring regular amendment. It can enable flexibility, innovation, and proportionality. However, in a goal setting regime there may be differing perspectives of what is 'reasonable.' Feedback from industry representatives involved in the development of the Ways of Working principles highlighted that it can be challenging to decide when 'enough evidence is enough', noting this can lead, in some instances, to disproportionately conservative decisions being made or additional demonstration being required. Case studies indicated that in some scenarios this can cause unintended negative impacts such as an increase in another form of risk or a reduction in benefit. Others highlighted that there can be a drive to find a single 'perfect' outcome (without considering the bigger picture), rather than exploring that there may be more than one solution. In some cases, this can lead to additional costs and delays.

7. This document therefore identifies an overarching principle, and 9 principles designed to assist in the application of ALARP and BAT when approaching discussions, demonstrations, and decisions. These principles have been drafted with input from the nuclear industry and regulators.

8. For the purposes of this document, we have used the term "stakeholder." This is intended to refer to dutyholders (including licensees/authorises/operators and employers in line with the different legal duties) **and** regulatory bodies of the nuclear sector only.It is also relevant to designers, and future/potential future dutyholders (e.g. requesting parties participating in the GDA).

   Although some of the observations may be relevant to regulators of other sectors no assessment has been made and so the observations should not be assumed to be applicable across all regulators or sectors.

9. The principles identified are intended to set out and clarify a joint regulatory and industry position on the application of ALARP and BAT in the nuclear sector and **do not introduce any new requirements on industry or regulators.**

10. This includes:

    - An overarching principle focused on optimisation and the appropriate approach to the consideration of risk meeting all of the relevant legal duties.
    - 3 behaviour-based principles focused on open-mindedness, mutual understanding, and understanding of relevant guidance.
    - 3 communication-based principles focused on early engagement, clear roles and responsibilities and clarity of communications.
    - 3 process-based principles focused on appropriate consideration of previous and other relevant decisions, oversight of people and processes, appropriate routes to seek clarification and a second opinion.

11. Environmental regulation in Scotland, including in the nuclear context, is devolved and is out of scope of this document.

Overarching Principle: Focus on optimisation and the appropriate approach to consideration of risk.

12. All nuclear, radiological, or conventional risks, to people and the environment, including consequential risks, need to be appropriately considered and managed. This includes the consideration of risk between different populations (such as workers and the public) and between short-term versus long-term risk, potentially to future generations.

13. In its broadest sense, optimisation means finding a solution that properly considers all the relevant risks and benefits and meets all of the relevant legal duties. This is wider than the specific legal definition in the context of radiation protection. This includes, as applicable: the health, safety and welfare of employees, health and safety of the public, environmental protection, security, safe transport of radioactive material and nuclear safeguards.

14. It is important that dutyholders and regulators are aware of the bigger picture, understanding the totality of a dutyholder's operations. An overall understanding of the whole facility and its operation should be considered as appropriate when making judgments and demonstrating when the legal standard has been met, as opposed to considering individual elements or aspects of design or operations in isolation.

15. To support the implementation of the overarching principle stakeholders should take account of the following:

The legal duty is to reduce risk so far as is reasonably practicable/achievable.

16. The legal duties on a nuclear site operator are to reduce risk so far as is reasonably practicable and to reduce radiation doses to as low as reasonably achievable. This is not the same as risk or dose minimisation or elimination at any cost. It is also important for stakeholders to be clear which requirements are goal setting (such as ALARP and BAT), and which are not (such as permitted discharge limits or individual dose limits or constraints).

17. Regulatory bodies should act within their vires as set-out in legislation, statutory guidance or as agreed through memoranda of understanding between regulators, as applicable. More generally, everybody should adhere to their relevant professional standards.

Focus on Risk of Harm

18. In the overall context of risk in ALARP/BAT decision making, it is fundamental that effort is **focused on reducing risk of harm** to people or to the environment. Effort and resources expended in determining whether risks have been reduced to ALARP/BAT should be proportionate to the risk identified and the control measures to be adopted.

19. The size of the risk and the potential impact should inform an appropriate and proportional approach to the provision of evidence. When any risk of harm would be difficult to measure

or distinguish from the risks people generally accept in everyday life, this should inform when ‘enough evidence is enough’ to demonstrate and achieve ALARP and BAT.

20. One area that needs careful consideration is the application of conservative assessments to inform a decision. For example, tools such as deterministic assessments to understand risk may be assessing extremely low probability or low risk events and can be subject to accumulation of safety margins and conservative assumptions across the assessment. Stakeholders and regulators should aim to properly understand The relationship between the assessment and the actual risk of harm rather than seeing it as a requirement for compliance to meet ALARP and BAT. This will enable effort to be applied proportionally and directed at the most important areas.

The need for meaningful engagement

21. Different factors will be considered when applying ALARP and BAT. Therefore, finding an optimal solution efficiently requires **meaningful engagement** between dutyholders and regulators. Stakeholders should work to share and understand positions with the mindset of achieving a consensus as to when ‘enough evidence is enough.’

Apply Supporting Principles

22. The following nine principles identify key aspects for dutyholders and regulators to consider when applying ALARP and BAT at nuclear sites.

Principle 1: Open-minded and flexible approach to how ALARP and BAT is demonstrated.

23. An important aspect of proportionality is determining when ‘enough evidence is enough’ in the demonstration of ALARP and BAT.

24. An open-minded approach, proportionate to the scenario, should be taken to how the case is demonstrated. The expectation should be that the demonstration is fit for purpose and there should be recognition that there may be multiple methods and approaches that can be used.

25. Demonstration of ALARP should not only be about the written evidence but about ongoing engagement, recognising that the demonstration can be achieved in multiple ways and is a continuous process.

26. Where there is definitive relevant good practice for managing a hazard, as applied and accepted elsewhere, this should be considered as a potential acceptable form of demonstration, without the need for new (including from first principles) assessments and studies. This can include replication of an existing activity, process, equipment or even facility, with the advantages of consistent operation. Where relevant good practice is considered, it is important that it is genuinely relevant to the specific circumstances.

27. There should be flexibility in the format and nature of evidence and the way in which the ALARP or BAT arguments are made. This should be proportionate to the size of the hazard or its relative risk.

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28. At all levels, there should be an openness to consider all aspects of a well-reasoned case as part of demonstration of ALARP and BAT. This can include, in line with other concepts in this document:
    - The ability to use judgement and order of magnitude estimation as opposed to extensive or detailed analysis.
    - Use of a stand-alone relevant good practice and/or replication argument, where genuinely relevant.
    - Being open to emerging and new relevant good practice that is applicable to the situation.
    - Respecting of earlier decisions made, providing the circumstances remain applicable.
    - Enabling decisions to be made at the appropriate levels in line with agreed roles and responsibilities, with graded governance, which is proportional to the risk.
    - A balanced use of probabilistic risk and conservative approaches or tools.
    - Use of tools and techniques to inform a decision, for example cost benefit analysis and multi-criteria analysis, as a means of demonstrating what is reasonable or not.
    - A shared understanding of the uncertainties and how they should be managed in the demonstration and decision making.

29. Key to this is to have good communication and set out what is considered appropriate evidence for the hazard under consideration in its context.

Principle 2: Mutual understanding between stakeholders of the approach to making judgments on regulatory compliance and overall decision making.

30. It is important that the dutyholder is properly informed about what regulatory decisions are being made and that there is a mutual understanding of the requirements and processes being followed.

31. The regulator's judgement on whether a dutyholder is compliant with regulatory requirements is not the same as the overall regulatory decision. A dutyholder could be judged not to be fully compliant, but this does not necessarily mean that a 'hold point release[5]' will be withheld or that enforcement action will be taken. The overall regulatory decision can take into account other relevant factors – both in relation to the specific dutyholder and its history, as well as, potentially, wider considerations.

32. There are some differences in the way in which relevant information is considered by the different regulators against the different requirements, i.e. which factors are relevant to the compliance judgment versus which factors can be considered but only as a part of the overall regulatory decision.

33. ALARP requires the weighing of risk reduction against the time, trouble or cost imposed on a dutyholder in reducing that risk. Only the risk and sacrifice associated with that dutyholder's business are relevant for compliance with the ALARP duty. However, ONR's overall regulatory decision can take into account some wider factors (e.g. in considering the risk impact across multiple dutyholders) but only those for which it has the capability and authority to do so.

34. In contrast to ALARP, BAT allows for the consideration of wider socio-economic and environmental factors as part of the compliance judgment. In addition, the environment agencies have a duty to apply their functions in a way that contributes to sustainable development.

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35. Regulators should:
    - Ensure that dutyholders are properly informed about exactly what decisions are to be made (this relates to both compliance judgements as well as the overall regulatory decisions) and provide information on the processes, information needed, timescales and decision-makers.

[5] A "hold point" is a specific point in a project or activity where progress is paused until certain criteria, set by the ONR, are met. These criteria are usually related to safety and compliance. A "hold point release" occurs when the ONR determines that these criteria have been satisfied, allowing the project to proceed.

- Ensure that decisions are made in line with the appropriate process and communicated to the stakeholders in a clear and timely manner.
- Ensure that any scope for challenging or appealing a decision is made clear to dutyholders along with the arrangements for doing so (also see Principle 9).

36. Dutyholders should:
    - Ensure that regulators are aware of broader factors.
    - Ensure that they are familiar with the regulatory processes.
    - Ensure the relevant information is provided to regulators, recognising that compliance-related information may need to be different to how wider decision-making information is provided.
    - Ensure they are clear what factors have and haven’t been taken into account in regulatory judgements.

Principle 3: Understanding of regulatory guidance by dutyholders, and clarity from regulators about its use.

37. Regulatory bodies provide guidance to assist their inspectors in making their decisions and guidance to dutyholders in complying with the requirements placed on them by the law, a nuclear site licence or an environmental permit. These documents provide essential information and insight as to how the regulators operates and their expectations in the assessment of ALARP and BAT demonstrations. A lack of awareness or a lack of understanding on what is required may result in dutyholders failing to meet necessary requirements.

38. Regulators also produce guidance primarily aimed at their own staff in assessing compliance or applying regulatory processes (e.g. in using permissioning or enforcement powers). Combined with guidance for dutyholders these provides a valuable resource in understanding what should be considered.

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39. Regulators should:
    - Make guidance accessible and clear to dutyholders and enable dutyholders to freely access it.
    - Be clear about the distinction between legal requirements versus regulatory guidance.
    - Provide appropriate support to dutyholders in understanding and applying any guidance. This will generally include answering questions and providing additional explanations of how guidance should be used in a specific context. It will not necessarily include dedicated training or new material, although these may be appropriate in some situations.

40. Dutyholders should:
    - Be familiar with and take due regard of regulatory guidance.
    - Be aware about the distinction between the legal requirements versus regulatory guidance.
    - Raise questions and seek clarification where necessary to avoid confusion or misunderstanding, and to identify any shortfalls.
    - Direct project teams to all relevant guidance.

Principle 4: Early and regular engagement between stakeholders.

41. Overall safety and environmental strategies and principles are usually identified at the start of projects. Having early engagement on a project between dutyholders and regulatory bodies helps to build a shared understanding and enables the exchange of views and expectations at a stage when adjustment and optimisation is easier to achieve. Regular engagement as the project develops helps to maintain this shared understanding. The goal should be to avoid surprises and identify fundamental issues as early as possible.

42. Early and regular engagement opens-up a dialogue between the different stakeholders, this includes within dutyholders' organisations, dutyholder-to-dutyholder and dutyholder-to-regulator, and should support the adoption of the principles identified in this document.

43. It is important that regulators maintain a balance between supporting early and regular engagement at clearly identified and scoped 'touch points' whilst avoiding unconstrained, or disproportionate involvement. This is to ensure the efficient and targeted use of resources, but also to maintain sufficient regulatory independence (thereby avoiding any indications of 'tacit' approval prior to formal assessment and ensuring sufficient objectivity in such assessments).

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44. For effective engagement, at the start of a project, stakeholders should:
    - Seek to agree a programme of engagement in advance of any intended key decisions with a suitable format and number of interactions as appropriate.
    - Agree a record of engagements to safeguard collective memory and make reference to the aim and purpose of the agreed engagements.
    - Set objectives for the programme of engagement. These should include:
        - Setting behaviours and expectations – this could include a discussion on how the other principles in this document could be implemented.
        - Identifying any constraints or restrictions that are absolute and must be complied with.
        - Identifying the scope and boundaries of the proposal and the necessary regulatory decisions.
        - Identifying what the likely Relevant Good Practice (see Principle 7) is for the situation.

45. Projects should be reviewed and revised to suit any changes in the circumstances.

Principle 5: Involvement of the right stakeholders with clear roles and responsibilities and lines of communication.

46. Nuclear projects often span long timescales and involve many different and distinct phases of work. It is important that the right people are involved at the correct time, and that roles and responsibilities for each phase of work are clearly defined and agreed from the outset. It is important that arrangements make clear who is responsible for the ALARP and BAT decision making process, within both the dutyholder and regulatory organisations.

47. The ALARP and BAT decision making process within a programme often relies on different approval routes at each phase. It is important that these approval routes are planned early in the programme, and that relevant stakeholders are informed of the programme, input required and timescales.

48. Organisational change is common and can often result in change of personnel working on a programme, or a change of individuals with responsibility or accountability for decision making. It is important that changes in personnel are communicated clearly to allow for effective onward engagement and reduce the potential risk of duplication or conflicting decisions.

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49. For effective and regular engagement, stakeholders should:
    - Involve appropriate stakeholders in each stage, and that contact details are shared and available for all concerned.
    - Set and agree clear roles and responsibilities for relevant stakeholders - e.g. use of RACI responsibility matrix to identify Responsible/Accountable/Consulted/Informed for decisions.
    - Provide arrangements for stakeholder involvement that can accommodate and adapt to organisational changes and any changes are adequately managed.
    - Arrange for appropriate coverage of areas of expertise and ability to recognise when there is a need to involve additional areas / specialists.
    - Adopt clear stakeholder engagement plans.

Principle 6: Clear communication between stakeholders

50. The nature of work in the nuclear industry means that often the demonstration of ALARP and BAT may involve complex situations. This requires clear, transparent, and honest communication, along with robust and well-presented evidence to ensure that all stakeholders are appropriately informed and are able to understand the risks and evidence used in the decision-making.

51. Different methods of communication will be appropriate at different phases of the programme. It is important that there is early discussion and agreement where appropriate on expectations and appropriate communication for each phase.

52. Similarly, it is important that an appropriate approach and level of detail is evidenced at each stage of design as noted in the overarching principle. This will facilitate the dutyholder's internal review processes, and the regulators' scrutiny and consideration of ALARP and BAT cases.

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53. Stakeholders should:
    - Foster a culture of openness to facilitate communication that is clear, transparent, and honest.
    - Consider appropriate means of communication at the various stages, including early engagement, e.g. initial workshops to ensure stakeholders have a common level of understanding for a project.
    - Consider appropriate means of communication at the various stages, including early engagement, e.g. initial workshops to ensure stakeholders have a common level of understanding for a project.
    - Reach a common understanding of the information and communication that is shared.

    Dutyholders should:
    - Use robust, well-presented evidence, with a level of detail appropriate for the stage of design, to demonstrate ALARP and BAT.
    - Present risks arising from a project in the context of wider site and programme risks.
    - Seek clarification whenever they are unsure or uncertain.
    - Be willing to provide and explain their positions and underlying claims, arguments, and evidence, including uncertainties or gaps and the plans to address those.

    Regulators should:
    - Provide views, opinions and feedback that is clear and unambiguous, including areas where further work is required to demonstrate ALARP or BAT.
    - Be clear as to the status and context of the information being shared e.g. is it advisory.

Principle 7: Appropriate consideration of previous decisions where relevant

54. There are two key aspects behind this principle. One relates to the previous decisions in relation to a multi-stage programme of work. The other relates to the application of 'Relevant Good Practice' and the use of learning and judgements made previously by regulators in similar circumstances.

Staged project decisions

55. In the nuclear sector, dutyholders and regulators usually have long-standing relationships to deliver major developments (e.g. new construction, significant modifications, etc.). The associated safety and environmental cases to do this are usually undertaken in stages and have key regulatory decision points. At all points in these journeys, all stakeholders should remain aware of the previous history, decisions, and agreements. Previously agreed positions should be considered wherever possible and appropriate (e.g. the down-selection of an option after appropriate optioneering), unless the relevant circumstances have changed (e.g. changes in requirements, introduction of new technology, lessons learned worldwide through operating experience of new designs).

Relevant Good Practice

56. The concept of 'Relevant Good Practice' (RGP) refers to control measures, standards, or other practices that are relevant to a situation which, if implemented, would typically be considered to meet applicable requirements based on what has been seen and judged elsewhere in similar circumstances – including from outside the nuclear industry and from around the world.

57. The use of RGP can avoid unnecessary first-principles analysis and justification for commonly encountered circumstances where the appropriate solution is well known from regulatory experience. In more complex situations – particularly those that are novel, high risk or challenging in some other way – then RGP may provide a starting point for the more detailed work that will be needed to find the optimised, balanced solution.

58. Dutyholders are free to choose an alternative approach to RGP, providing they have satisfied the requirement to reduce a risk to ALARP.

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59. Both regulators and dutyholders should:

- Identify and be aware of previous relevant decisions and consider if they impose any constraints or expectations on the current position.
- Maintain previously-agreed positions wherever possible – recognising that changing circumstances (e.g. changes in requirements or new information) sometimes means that this cannot be achieved.

- Form a view on whether any good practice exists and be able to explain to other stakeholders why that is relevant to the circumstances and why it would be consistent with a solution that meets the applicable legal requirements.
- In all the above, all stakeholders should be open and transparent in discussing and sharing their information and opinions.

Principle 8: Oversight of people and processes by all stakeholders.

60. Organisations need to have oversight over their people and processes. Oversight of individuals is essential for ensuring staff are acting within the scope and authority of the role they have been assigned, adhering to appropriate behaviours and representing their organisation in the manner that it would, as a body, wish to be represented. Oversight of processes is essential for ensuring they are properly implemented.

61. Effective oversight should help foster clear communication and appropriate behaviours within organisations. Challenge and input from individuals are necessary and valuable but it is also important to avoid domination by a single strong voice. Stakeholders should ensure that the appropriate degree of discussion and informed consensus is sought, balancing individual views against those of the majority.

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62. Stakeholders should put in place effective arrangements for the oversight of people and processes that:
    - Organisations need to ensure that behaviours align with organisational values and that activities align with organisation policies and processes. Encourage behaviours and decisions that align with the requirements and expectations of the organisations they represent.
    - Empower the right people with the necessary expertise to make decisions and have the confidence to do so.
    - Minimise potential for ‘over governance’ and/or ‘ratcheting up’ of requirements and be able to consider and advise on moderation and/or simplification.

Principle 9: Provide appropriate routes to seek clarification, second opinion or raise concerns.

63. At times there may be a lack of understanding on elements in the ALARP/BAT demonstration or a desire to seek a second opinion on a decision that has been made, or a need to raise concerns regarding a process or behaviours. This may occur internally or between organisations on a nuclear site. The following routes should be available to support stakeholders.

Clarification

64. Individuals should be encouraged to check understanding and seek clarification when needed and receive timely feedback. This is both internally within their organisation and externally.

Second Opinion

65. Where a second opinion is sought, this should, where appropriate, introduce a degree of independence, e.g. ask for a second opinion from a separate part of the organisation. The second opinion should be objective without internal influence.

Escalation

66. This route may be through escalating the issue to the next level of seniority in an organisation or meeting structure with regulators. So that escalation is effective, it needs to be able to provide the appropriate specific expertise that the issue requires. It will also need to ensure that the behaviours are correct, and not automatically reinforcing the view of less senior representatives in the organisation.

67. The process should allow, where appropriate, that other parts of the organisations, regulators, other external dutyholders who are similarly knowledgeable can be consulted in order to seek a wider consensus and decision.

68. The culture should foster an environment where individuals feel secure in utilising these channels without concerns for adverse consequences.

69. Where statutory appeal routes are available, it is important all stakeholders are aware of these options. However, due to their time-consuming nature, they should be considered a last resort.

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70. Stakeholders should have a meaningful process, that:
    - Is transparent internally and externally.
    - Is fair and open-minded.
    - Is able to lead to a change in the original decision or amend a position where needed
    - Has appropriate expertise, time, and resources.
    - Makes use of independence where possible (both internally and externally where appropriate).
    - Is timely.

Conclusion

71. All parties are encouraged to actively adopt these principles and enhance their ways of working when applying ALARP and BAT. This document and its principles will be reviewed based on experience and learning.

72. To provide feedback on this document please contact: **NuclearSafetyPolicy@energysecurity.gov.uk.**

This publication is available from: www.gov.uk/government/publications/nuclear-industry-principles-to-guide-the-application-of-as-low-as-reasonably-practicable-alarp-and-best-available-techniques-bat

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