ONR's Regulatory Assurance Framework - Driving Continuous Improvement in our Regulation

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Purpose and Background

• ONR established in 2013 as the safety and security regulator for UK nuclear licensed sites.

• Integrated assurance framework developed to:
  • provide independent evidence based assurance to the Executive and Board that the organisation is delivering its mission.
  • Demonstrate an organisational culture which is open to challenge and embraces continuous improvement.

• Based on HM Treasury “three lines of defence model”.

• Part of ONR’s arrangements for collection, analysis, implementation and dissemination of learning from regulatory experience.
Integrated Assurance Framework

- **Tier 1** - In-line oversight by those responsible for delivery.

- In-line review of regulatory activity by Regulatory Oversight Manager.

- **Tier 2** - Regulatory Assurance independent of front line.

- Strategic reviews of regulatory processes and controls

- **Tier 3** – Government Internal Audit Agency.

- Professional, fully independent, risk based audit of key business process and controls.
How does it work in practice?

• Model relies on collaboration and strong working relationships between three tiers to:
  • Drive efficient, integrated planning of assurance activities.
  • Integrate findings to provide stronger insights,
  • Communicate a single integrated assurance picture to senior leaders, the Executive and Board,
  • Monitor corrective actions and disseminate learning,
    ….while safeguarding independence of individual tiers.

• Leadership support critical to realising benefits of integrated approach.
Case Study – Observed Inspection Programme

• Observation of ~12 inspections per annum.

• Purpose:
  • To gain assurance of quality and consistency.
  • To identify good practices and opportunities to improve.

• Observers act as “critical friend” focused on organisational improvement.

• Findings analysed on annual basis

• Learning points:
  • Feed into training programme and process improvement.
  • Disseminated to all inspectors
Benefits and Challenges

• Systematic approach to identification of learning from regulatory experience.
• Coherent assurance coverage providing insight to senior leaders.
• Increased stakeholder confidence.

Resources:
• 4 full time equivalents (FTE) allocated to model
• Additional bought-in audit services.
• Competence: Inspectors undertaking assurance require demonstrable internal credibility, experience and specific behavioural traits.
Summary and Conclusions

• Learning from Regulatory Experience has important role to play in improving regulatory processes and practices and preventing regulatory failure.

• ONR’s Integrated Assurance Framework forms part of our arrangements for managing learning from Regulatory Experience.

• ONR supports IAEA’s work to share approaches to “Management of Regulatory Experience” via development of a TecDoc, building on Requirement 15 of the GSR Part 1 (Rev 1).