Guiding Principles for Radiation Protection Professionals on Stakeholder Engagement

A proposal for consideration by IRPA
Introduction

During the 11th Congress of the International Radiation Protection Association (IRPA) held in Madrid in May 2004 there were considerable discussions on the benefits of involving all relevant parties in decision-aiding in radiological protection. It was agreed that this involvement, briefly described as "Stakeholder Engagement", should play an important and integral part in the process. A need was identified for guidance to be produced to help radiation protection professionals to understand the objectives, requirements and demands of stakeholder engagement, encourage participation and provide a framework for establishing a constructive dialogue with other stakeholders.

As a result of these discussions a group of professionals from the French, Spanish and UK IRPA Associate Societies decided to collaborate in organising a series of workshops to exchange information especially on case studies of how stakeholder involvement had been carried out in different fields. The first workshop was held in November 2005 in Salamanca, Spain and the second in France in November 2006 under the auspices of the Community of Municipalities of the Montbéliard Country. In addition to the sharing of experience with a wide range of participants these workshops resulted in the distillation of a number of principles for the appropriate implementation of stakeholder engagement. The third workshop held in the UK in Oxford in December 2007 continued the tradition of information exchange but also devoted much of the time to critical examination of the draft guiding principles. Following this the guiding principles were redrafted by a small working group to form the present document. During the course of this development the progress was systematically reported to meetings of the IRPA Executive Council.

This document is therefore the outcome of the work by professionals in the three Societies with involvement in all meetings by a professional in the Italian Society. It is offered by IRPA to all Associate Societies in the hope that they will find the guidance useful to their members and may wish to adopt it as a preferred mode of operation for stakeholder engagement.

A Natural Development

The principle of “Optimisation” has been developed over several decades by the International Commission on Radiological Protection (ICRP). In its most recent recommendations, in ICRP publication 103, the principle of optimisation is defined as “the source related process to keep the likelihood of incurring exposures (where these are not certain to be received), the number of people exposed, and the magnitude of individual doses as low as reasonably achievable, taking economic and social factors into account”.

The understanding and application of this process has developed significantly over the decades, but it has long been recognised that key elements of this process are the identification of relevant factors and those who can provide an input to the decision making. As the complexity of projects increase, so do the number of factors and groups of individuals relevant to the decision making. What became apparent was that there was a need for a systematic and structured approach to the involvement of those who may have a potential input to, or be affected by decisions. In most occupational exposure situations this has now become an integral part of the management process.

There are also many situations where the scope of the problem goes beyond the occupational environment and involves disparate groups of the public. The need for a systematic approach and the same fundamental principles also applies here: what changes is the scale and complexity of the process. For example, in an occupational exposure setting there will often need to be a dialogue between radiological protection specialists, the management, workers and other groups, to clarify in terms that each group fully understands, the exact nature of a problem, relevant factors and options. This process is facilitated by all the groups having a common understanding of the business they are in and is often subsumed into normal working arrangements. However as the scope of an issue increases, and especially where there are disparate public groups involved, this shared appreciation of the issues and context cannot be assumed and developing a common understanding would need to be overtly addressed. Thus while the engagement process is the same for all situations, the effort involved in implementing it is situation specific.

Over the years the term “Stakeholder” came into general usage with ICRP defining it as “those parties who have interests in and concern about a situation” (ICRP publication 82). Their involvement “is seen as an important input to the optimisation process”. The involvement or engagement of stakeholders has been the subject of a number of international meetings and publications from NEA and IAEA that have included case studies. There is consensus that

- Distinctions need to be made between  
  - The decision maker (often the management or Competent Authority) who has clearly defined roles and responsibilities in the process, and  
  - Stakeholders who can provide inputs to the decision making process i.e. decision-aiding

- The detail of the mechanisms to engage stakeholders need to take into account local and national infrastructures and the specific circumstances of the situation

- Well structured and effective stakeholder engagement improves the quality of decision making and achieves more effective and sustainable decisions, that people have confidence in.

What has been less clear, and was the subject of significant discussions at the last IRPA Congress; is how to achieve well structured and effective stakeholder
engagement. The Workshops described above have addressed this issue and concluded that

- Whilst the detail of implementing stakeholder engagement needs to take into account local and national infrastructures and the circumstances of the situation; there is a common set of underlying principles that should be used.
- The radiation protection professional has a role to play in encouraging adoption of these principles and advising decision makers on their application.

This document sets out those principles and provides guidance on their use in a way that is proportionate to the issue under consideration.
Guiding Principles for Radiological Protection Professionals
On Stakeholder Engagement

These guiding principles are intended to aid members of IRPA Associate Societies in promoting the participation of all relevant parties in the process of reaching decisions which may impact on the well being and quality of life of workers and members of the public, and on the environment. In promoting this approach, radiological protection professionals will aim to develop trust and credibility throughout the decision making process in order to improve the sustainability of any final decisions. Radiological protection professionals should endeavour to:

1. Identify opportunities for engagement and ensure the level of engagement is proportionate to the nature of the radiation protection issues and their context.

2. Initiate the process as early as possible, and develop a sustainable implementation plan.

3. Enable an open, inclusive and transparent process.

4. Seek out and involve relevant stakeholders and experts.

5. Ensure that the roles and responsibilities of all participants are clearly defined.

6. Collectively develop objectives for the process, based on a shared understanding of issues and boundaries.

7. Develop a culture which values a shared language and understanding, and favours collective learning.

8. Respect and value the expression of different perspectives.

9. Ensure a regular feedback mechanism is in place to inform and improve current and future stakeholder engagement.
Guidance

Principle 1

Identify opportunities for engagement and ensure the level of engagement is proportionate to the nature of the radiation protection issues at stake and their context.

The primary purpose of engagement is to inform and aid decision-making on measures to control or limit radiological risks so that:

- the measures are more widely understood and respected;
- the measures are optimal and work in practice across a broad range of foreseeable situations;
- the measures are tailored to the local context (social and economic context, environment of plant…);
- the measures will continue to be effective and have credibility for some reasonable period of time.

Engagement will add real value to the decision-aiding process and its outcome but its extent and nature need to be proportionate to the radiation protection issues and concerns at stake. This includes being realistic about the co-operation that can be achieved and about resource and time that might need to be expended on handling more challenging stakeholders. The more complex the radiological protection problem and the more serious the risk, the higher is the justifiable investment in engagement.

In identifying opportunities for engagement it is important to recognise changing societal expectations. For example increasing awareness about risks associated with some activities, concerns over environmental deterioration and loss of public confidence in some organisations are all likely to broaden or shift the range of stakeholders that need to be engaged.

Principle 2.

Initiate the process as early as possible and develop a sustainable implementation plan

Feed-back experience has shown that involving stakeholders, as early as possible, in decision-aiding processes will generally favour the mutual understanding of the situation, and therefore may avoid a blockage. Although it will probably increase the timing of the process, involving stakeholders will generally allow a better cooperation between all participants and lead to more acceptable and robust decisions.
At the early stage of the decision-aiding process, involving stakeholders will give the opportunity to discuss its framing and to elaborate in common a sustainable plan in terms of scope, objectives, timetable and milestones, deliverables, knowledge production, financing support etc. In order to favour the sustainability of the process, a reasonable approach, shared by all participants, should be adopted when defining this plan. The process has to be proportionate to the realities of the situation, and take into account the stakeholders’ time/opportunity to participate according their particular circumstances and/or financial position. Finally, it has to be kept in mind that it will be necessary to regulate and adapt the process according the evolution of the situation.

**Principle 3**

**Enable an open, inclusive and transparent process**

Openness, inclusiveness and transparency, which are interrelated, should constitute the essence of a successful stakeholder engagement process and should always be present. They are the basis for understanding, getting confidence in the process and promoting it. They may be supported by collectively agreed rules and behaviours, together with mechanisms for their assessment.

The process should include all the relevant stakeholders, extending representation beyond the obvious candidates to all those perceived to have a share or an impact associated with the risks of the endeavour under consideration. Different expertise and sensibilities will generally enrich the process and give a higher validity to the results. Differing opinions should be encouraged, valued and tolerated.

All those issues at stake should be considered, with openness, to identify, select and discuss any associated uncertainties.

Along the process, it is important to share the relevant information needed to build a collective understanding of the problem. The flow of information should be quick, concise, clear to all and honest (in terms of accuracy, uncertainty etc.). Dialogue would be facilitated if two-way communication of information between all participants is put in practice. By default, information should be accessible to all, but respecting information truly requiring protection. Rather than withholding information on grounds of personal or national security or confidentiality, it is preferable to have it presented in a different way if necessary to avoid compromise, rather than agree its omission.

It would be helpful to build, grow, review and maintain a common knowledge pool, identifying a responsible ‘gatekeeper/custodian’ for the knowledge pool who is trusted and respected.
Principle 4

Seek out and involve relevant stakeholders and experts.

A key part of decision-aiding is having clarity over what the issue in question is, the scope of the problem and the factors that may be relevant. Inherent to this process is the need to identify those who can and should contribute; in short, ensuring an appropriate diverse range of views are included. The radiological protection professional can help to promote this approach.

There is a need to reach out to other disciplines and stakeholders, making them aware of the issues under consideration. Without this first step relevant factors may not come to light, undermining the validity and sustainability of any decisions. For example experts in one discipline may not be aware of knock on effects in other areas. Similarly if the net of consultation has been set wide enough to elicit “no comment” replies, this is useful information to support the bounding of the issue. Bringing together all the diverse views may be an iterative process, particularly for large scale decision making that may involve socio-economic factors. Thus it should be accepted that the initial set of stakeholders may not be the final set. The process can be a dynamic one with stakeholders joining, but also leaving, throughout.

There is a need to have respect for information and knowledge gained through individuals’ experience as well as that from scientific and technical experts. Some issues, particularly high profile ones, bring with them stakeholders with significantly different points of views. It is important that there is engagement with, rather than avoidance of, these different groups. Inevitably there will be conflicting views and information. How these are evaluated within the decision-aiding process is a separate but important element (see principles 3 and 5), however it is clear that obtaining a full spectrum of views is important.

Principle 5.

Ensure that the roles and responsibilities of all participants are clearly defined

A clear definition, at the beginning of the process, of the roles and responsibilities of the different categories of participants (for example, experts, authorities, sponsors, lay persons, decision maker versus decision taker, ...), is important to obtain a shared understanding of what is expected from each and the extent of the influence they may have. A clear delineation of the consultation phase and the decision phase, as well as a clear understanding of where individuals’ responsibilities and accountabilities begin
and end is essential to clarify the conditions of the engagement. As such, it is a prerequisite for all participants to engage themselves in the process.

One of the objectives of stakeholder engagement in a decision-aiding process is to favour a dialogue and mutual understanding, but not necessarily to reach a consensus on all aspects of the situation. It is thus important to preserve the autonomy of the different categories of participants concerning their point of views or evaluation of the situation. This delineation of roles is a key element to create the conditions for the participants to contribute to the improvement of the evaluation of the situation and/or the radiation protection options.

Beyond clarifying the roles and responsibilities, sharing the rules of cooperation between the participants will also favour the success of the process.

**Principle 6**

*Collectively develop objectives for the process, based on a shared understanding of issues and boundaries.*

The need for a collective approach to developing process objectives is implied by application of the other principles. Principle 2 talks of the development of a sustainable plan, Principle 4 of identifying the responsibility of contributors and of scoping problems and factors, and Principle 5 of the need to co-operate.

Lack of collectivism disenfranchises stakeholders, whereas working alongside each other allows a tight group to emerge which is then capable of explicitly defining the process objectives. The group is then in a position to validate these against its shared understanding of issues and boundaries, as well as to collectively agree the scope or remit for the work.

Once the objectives are identified in principle then the discussions can extend to ensuring that they are refined in the light of the resources available. The realism brought about by this dialogue invariably leads to more harmonious working by avoiding feelings of frustration with the process that might be perceived as more imposed than negotiated.

**Principle 7**

*Develop a culture which values a shared language and understanding, and favours collective learning.*
In order for all stakeholders to fully appreciate the factors entering into the decision they must be able to understand what is being said. This understanding can be seriously compromised by the use of jargon and technical language as well as acronyms and abbreviations. The radiological protection professional should be motivated to develop a "common language" sufficiently precise scientifically not to offend the various experts but also sufficiently rooted in common, every-day experience to be meaningful to all those involved. Part of this approach is likely to involve formal and informal training of stakeholders leading to the creation of a shared knowledge base incorporating those technical concepts essential to a full understanding of the issues.

**Principle 8**

*Respect and value the expression of different perspectives.*

It is important that each participant in the process recognises their own and each others’ uniqueness, and, because of this, is aware that other participants have different backgrounds and sensibilities and, therefore, may view issues from different perspectives.

Participants should be aware that some may be experts in their own field, and the invitation and integration of these views is an important step in the process, whilst accepting challenges to expert opinion. Evaluation of uncertainties in the assessments where expert opinion is divided should be undertaken in an open, accessible and clear manner.

Respect for one another’s view encourages a wide range of thought and ideas which can be evaluated as a whole during the engagement process. This acceptance of diverse perspectives, thinking and values has the potential to enrich the process, providing that the process is controlled such that any entrenched views and ideologies, if present, are managed by agreed mechanisms. In a similar way, seemingly radical or novel opinions should not be dismissed out of hand, but evaluated with respect and dignity in the same way as other ideas. It is important that each individual can view acknowledgement of their own contribution in the record of the meetings.

Participants should be aware that rational thought, respect and acceptance of opinions will tend to be challenged or obscured when discussing issues which are emotive to the extent of polarising opinion without knowledge of the full facts, or issues which have attracted significant media or political interest. Due consideration should be allowed if this happens to restore the desirable climate of mutual respect and cooperation.

**Principle 9**
Ensure a regular feedback mechanism is in place to inform and improve current and future stakeholder engagement

When engaging with stakeholders an opportunity should be provided for both the stakeholders and those responsible for the process to give mutual feedback on the approaches and tools used and on eventual outcomes. This serves to inform and improve ongoing processes as well as influencing how future ventures should be conducted. The following types of criteria might be included in the evaluation: appropriateness of the terms and timing of engagement, the quality and appropriateness of the information provided; comprehensiveness of the issues that were addressed; inclusivity in terms of the number and diversity of stakeholders involved and the nature of that engagement; practicability/feasibility of the eventual outcomes.

Stakeholder engagement commonly involves a series of meetings/workshops/round table discussions and other types of face-to-face encounters. These provide continuous learning opportunities to be discussed by the group at the end of each meeting, whereby agreements on improvements in the management of subsequent meetings are agreed and prioritised. It should be recognised that implementation of changes may require additional resources and so any improvements agreed upon must be realistic and achievable.

When a stakeholder engagement process comes to an end, it is important that those responsible for the process make the results known to all those who participated. If these results do not reflect the recommendations/findings from the stakeholders, those responsible must offer an explanation to the stakeholders for any deviation from what was agreed. In this way, the feedback of results and decisions will help to maintain confidence in the process.

Tangible improvements in stakeholder engagement resulting from the establishment of a constructive feedback mechanism will contribute to a more sustainable process, which could serve as a role model for future projects. Dissemination of the lessons learned, achievements and how challenges can be met should be disseminated as widely as possible among the radiological protection community.