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| ONR GUIDE | | | |
| ONGOING PERSONNEL SECURITY “AFTERCARE” | | | |
| Document Type: | Nuclear Security Technical Assessment Guide | | |
| Unique Document ID and Revision No: | CNS-TAST-GD-8.3 Revision 0 | | |
| Date Issued: | March 2017 | Review Date: | March 2020 |
| Approved by: | David Pascoe | Professional Lead | |
| Record Reference: | TRIM Folder 4.4.2.19079. (2017/108488) | | |
| Revision commentary: | New document issued | | |

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OFFICIAL**1. INTRODUCTION**

- 1.1 The Office for Nuclear Regulation (ONR) has established a set of Security Assessment Principles (SyAPs) (Reference 7). This document contains Fundamental Security Principles (FSyPs) that dutyholders must demonstrate have been fully taken into account in developing their security arrangements to meet relevant legal obligations. The security regime for meeting these principles is described in security plans prepared by the dutyholders, which are approved by ONR under the Nuclear Industries Security Regulations (NISR) 2003 (Reference 1).
- 1.2 The term 'security plan' is used to cover all dutyholder submissions such as nuclear site security plans, temporary security plans and transport security statements. NISR Regulation 22 dutyholders may also use the SyAPs as the basis for Cyber Security and Information Assurance (CS&IA) documentation that helps them demonstrate ongoing legal compliance for the protection of Sensitive Nuclear Information (SNI). The SyAPs are supported by a suite of guides to assist ONR inspectors in their assessment and inspection work, and in making regulatory judgements and decisions. This Technical Assessment Guidance (TAG) is such a guide.

2. PURPOSE AND SCOPE

- 2.1 This TAG contains guidance to advise and inform ONR inspectors in the exercise of their regulatory judgement during assessment activities relating the dutyholder's ongoing personnel security arrangements for its employees and contractors. It aims to provide general advice and guidance to ONR inspectors on how this aspect of security should be assessed. It does not set out how ONR regulates the dutyholder's arrangements. It does not prescribe the detail, targets or methodologies for dutyholders to follow in demonstrating they have addressed the SyAPs. It is the dutyholder's responsibility to determine and describe this detail and for ONR to assess whether the arrangements are adequate.

3. RELATIONSHIP TO RELEVANT LEGISLATION

- 3.1 The term 'dutyholder' mentioned throughout this guide is used to define 'responsible persons' on civil nuclear licensed sites and other nuclear premises subject to security regulation, a 'developer' carrying out work on a nuclear construction site and approved carriers, as defined in NISR. It is also used to refer to those holding SNI.
- 3.2 NISR defines a 'nuclear premises' and requires 'the responsible person' as defined to have an approved security plan in accordance with Regulation 4. It further defines approved carriers and requires them to have an approved Transport Security Statement in accordance with Regulation 16. Persons to whom Regulation 22 applies are required to protect SNI. ONR considers workforce trustworthiness to be an important component of a dutyholder's arrangements in demonstrating compliance with relevant legislation.
- 3.3 Regulations 9, 17(3) and 22(7) (d) of NISR relate to workforce trustworthiness and have been included at Appendix 1 to this TAG. Furthermore, due consideration in relation to the treatment, use and the holding of personal information must also take into account the following legislation:
- Data Protection Act 1998
 - Human Rights Act 1998
 - Rehabilitation of Offenders Act 1974
 - Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975

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- Rehabilitation of Offenders (Exclusions and Exceptions) (Scotland) Order 2003
- Rehabilitation of Offenders (Northern Ireland) Order 1978
- Equality Act 2010
- Protection of Freedoms Act 2012

4. RELATIONSHIP TO IAEA DOCUMENTATION AND GUIDANCE

- 4.1 The essential elements of a national nuclear security regime are set out in the Convention on the Physical Protection of Nuclear Material (CPPNM) (Reference 2) and the IAEA Nuclear Security Fundamentals (Reference 3). Further guidance is available within IAEA Technical Guidance and Implementing Guides.
- 4.2 Fundamental Principle F of the CPPNM refers to security culture and states that all organisations should give due priority to the security culture, to its development and maintenance necessary to ensure its effective implementation. Essential Element 12 of the Nuclear Security Fundamentals refers to developing, fostering and maintaining a robust nuclear security culture and to establishing and applying measures to minimise the possibility of insiders becoming nuclear security threats.
- 4.3 A more detailed description of the elements is provided in Recommendations level guidance, specifically Nuclear Security Series (NSS) 13, Recommendations on Physical Protection of Nuclear Material and Nuclear Facilities (INFCIRC/225/Revision 5) (Reference 12). Further detail at the operational level is contained in an Implementing Guide on Preventive and Protective measures against insider threats (NSS 8) (Reference 5), in particular Sections 3 and 5. An Implementing Guide on Nuclear Security Culture (NSS7) (Reference 4) contains further information on establishing workforce trustworthiness (Section 4.3(i)).

5. RELATIONSHIP TO NATIONAL POLICY DOCUMENTS

- 5.1 The SyAPs provide ONR inspectors with a framework for making consistent regulatory judgements on the effectiveness of a dutyholder's security arrangements. This TAG provides guidance to ONR inspectors when assessing a dutyholder's submission, demonstrating they have effective processes in place to achieve Security Delivery Principle 8.3 – Ongoing Personnel Security, in support of Fundamental Security Principle 8 – Workforce Trustworthiness. The TAG is consistent with other TAGs and associated guidance and policy documentation.
- 5.2 The HMG Security Policy Framework (SPF) (Reference 6) is supplemented by the "Cabinet Office SPF Personnel Security supplement (Reference 13), HMG Baseline Personnel Security Standard Guidance on the pre-employment screening of civil servants, members of the armed forces, temporary staff and government contractors" (Reference 9). It describes the Cabinet Office expectations of how HMG organisations, and third parties handling HMG information and other assets, will apply protective security to ensure HMG can function effectively, efficiently and securely. The security outcomes and requirements detailed in the SPF have been incorporated within the SyAPs. This ensures dutyholders are presented with a coherent set of expectations for the protection of nuclear material and nuclear facilities and SNI, and for the employment of appropriate personnel security controls both on and off nuclear premises.
- 5.3 The Classification Policy (Reference 8) indicates those categories of SNI that require a classification and the level of classification to be applied.

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OFFICIAL**6. ADVICE TO INSPECTORS****The Benefits of Ongoing Personnel Security**

- 6.1 Throughout this TAG the term ‘a member of staff’ includes both employees and contractors, as defined in detail in TAG 8.2. Pre-employment screening and national security vetting (NSV) seeks to provide an assurance of an individual’s honesty and integrity at the time the checks were undertaken. Personal circumstances can change over time. In some instances this can lead to changes in behaviour that creates new risks or exacerbates existing ones. Dutyholders should, therefore, implement and maintain robust aftercare arrangements to manage the insider risk effectively.
- 6.2 Furthermore, effective ongoing personnel security arrangements help ensure that security records are current and accurate. Thus access to sensitive assets can readily be denied where there is no longer a “need to know”, for example because of a change of role, or cessation of employment.
- 6.3 CPNI, within its “Ongoing Personnel Security – A Good Practice Guide” (reference 13), defines personnel security as a system of policies and procedures that seek to:
- Reduce the risk of recruiting staff who are likely to present a security concern;
 - Minimise the likelihood of existing employees becoming a security concern;
 - Reduce the risk of insider activity, protect the organisation’s assets and where necessary carry out investigations to resolve suspicions or provide evidence for disciplinary procedures;
 - Implement security measures in a way that is proportionate to the risk.

Assessment of Arrangements

- 6.4 The purpose of the assessment is to verify that the dutyholder’s arrangements for ongoing personnel security are effective. ONR inspectors will decide whether they are adequate to support approval of the security plan. The following section of the TAG assists inspectors in making that decision.
- 6.5 Effective ongoing personnel security arrangements will be assessed against three subject areas:
- Ongoing Personnel Security Culture
 - Compliance with mandated reporting requirements as referenced in the Cabinet Office SPF Personnel Security Supplement (Reference 17)
 - Dutyholder oversight and reporting arrangements on:
 - matters which will affect local security records (including access controls) and the National Security Vetting Service (NSVS) database
 - behaviours which may warrant a further assessment as to the suitability of an individual to hold a NSV clearance or, at BPSS, a need for controls on someone’s employment.

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OFFICIAL**Regulatory Expectations**

- 6.6 The regulatory expectation placed upon the dutyholder is that they will ensure the security plan identifies clear ongoing personnel security arrangements, including seeking assurance in respect of the contracted component of the workforce. Arrangements should include regular security appraisals (which may be part of a wider appraisal process), promote an organisational culture that understands and supports security and drive workforce and line management engagement.

| FSyP 1 – Workforce Trustworthiness | Ongoing Personnel Security | SyDP 8.3 |
|---|----------------------------|----------|
| Dutyholders should implement and maintain on-going personnel security management, arrangements and procedures to remain assured about their workforce (staff and contractor community) and to mitigate the risks from well-placed insiders. | | |

7. ONGOING PERSONNEL SECURITY CULTURE

- 7.1 Dutyholders' employment policies are subject to statutes (e.g. Equality Act 2010) that are not relevant statutory provisions of the Energy Act 2013, which are not subject to direct regulatory oversight by ONR. However, aspects of the ongoing personnel security culture are concerned with whether the workforce feels valued and how likely it is to follow acceptable behaviours. Employers that treat their employees fairly provide guidance on secure behaviour and address concerns appropriately, perhaps by offering various support mechanisms, will fare better in this respect. Thus inspectors will review dutyholders' policies and practices in relation to those publicised in the CPNI document "Ongoing Personnel Security - A Good Practice Guide" (Reference 13).
- 7.2 Inspectors should seek evidence that a dutyholder considers whether its own employment policies, including exit procedures, adequately support an ongoing personnel security culture. Dutyholders' oversight of ongoing personnel security and practice should also include awareness of policies and practice in the supply chain.

Inspectors should consider:

- Are the dutyholder's employment practices likely to encourage the workforce to feel valued and able to report unacceptable conduct, and follow acceptable behaviours? Does the dutyholder consider the employment practices of its contractors in this regard?
- Has the dutyholder considered the impact of its employment policies, and those of its supply chain, on their ongoing personnel security culture?

8. COMPLIANCE WITH MANDATED REPORTING REQUIREMENTS

- 8.1 Holding an NSV clearance brings with it certain requirements for the individual. Such requirements are made clear to the individual during the NSV process. For example each NSV clearance holder signs a declaration to the effect that they will notify any material changes in the information provided to the relevant personnel or security branch (See References 14 and 15).
- 8.2 Upon receiving confirmation of an NSV clearance, the individual receives a document "Maintaining Security Clearances – A guide for staff and contractors" (Reference 18) which

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is attached to the ONR NSV clearance letter – Appendices 6-8. These place further requirements on the NSV clearance holder. ONR relies on dutyholders forwarding reports made by the NSV holder, if they do not report them directly to ONR (CNS).

- 8.3 As the vetting authority, ONR (CNS) publishes (Appendix 1) a mandated Annual Security Appraisal Form (ASAF) for DV holders. Dutyholders' arrangements should ensure that this specific DV ASAF is used and, when complete, sent to the ONR (CNS) Vetting Authority annually. The dutyholder's arrangements should ensure that non-compliance by either the subject or their line manager is reported to the ONR (CNS) Vetting Authority.
- 8.4 As the Vetting Authority, ONR (CNS) has decided that reports on positive results for alcohol and drug misuse are mandatory for NSV holders. The dutyholder's arrangements should therefore include a process to ensure ONR (CNS) is made aware of all NSV holders' positive tests for unlawful substances or misuse of prescription drugs. Testing programmes may include tests undertaken "for cause", on a random basis, or through an enhanced testing regime. The report is to include the date of the test and the substances found. For alcohol, unless the subject is already on a targeted testing programme, ONR (CNS) need only be notified once an individual has tested positive twice within a five-year period.
- 8.5 A dutyholder's arrangements should include a consent process that includes a notification protocol, for individuals to accept before they undergo a drugs or alcohol test.

Inspectors should consider:

- Do the dutyholder's arrangements ensure any mandatory notifications or reports made by individuals are forwarded, where relevant, to the ONR (CNS) Vetting Authority?
- Does the dutyholder use the DV ASAF process and forward the reports to ONR. Is non-compliance being reported to ONR?
- Do the dutyholder's arrangements explicitly include the reporting requirement for positive drug and alcohol tests with a consent process that clearly details the reporting protocols to members of staff?

9. OTHER DUTYHOLDER OVERSIGHT AND REPORTING ARRANGEMENTS

- 9.1 **Clearance validity.** It is important that a clearance remains valid once it is granted. A clearance will cease to be valid when there is no longer a dutyholder to sponsor it. A clearance will lapse when the holder resigns, retires, is dismissed, or comes to the end of a contract, although it is possible to reinstate a clearance within a 12-month window. A dutyholder's arrangements should include a process to remove access rights to particular buildings or the site as a whole, when someone ceases to be a member of the workforce or if their role/access requirements changes, eg through its exit procedures. Any change to an individual's access rights should be enacted immediately. Lapsed clearances, eg where a clearance no longer has a regulated sponsor organisation, should be reported to ONR (CNS). Such reports are known as a casualty return and a template for these is at Appendix 4. The dutyholder should, as the employer or contracting authority, record any lapsed BPSS.
- 9.2 Dutyholders are mandated to ensure the ongoing accuracy of the NSVS and to ensure, where known, the reporting of the following in respect of NSV holders:
- changes in nationality (as may affect management of caveats and associated access rights)

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- changes in name or gender
- changes in employment type (i.e. staff becoming contractors or vice-versa), as this can affect the validity of the clearance period
- downgrading a clearance to a lower level if the higher level is no longer required.

These reports may be made directly, using the casualty return and, where appropriate, via the submission by the individual of a change of personal circumstances questionnaire (see References 21 – 23).

- 9.3 Casualty returns are to be sent to the ONR (CNS) Vetting Authority with the Change of Personal Circumstances Questionnaires submitted directly to UKSV. Such information is likely to be relevant to the dutyholder for local security records and access control systems in respect of BPSS holders who fall outside of the casualty reporting process.
- 9.4 Dutyholders are required to immediately inform the ONR (CNS) Vetting Authority whenever NSV holders are dismissed or excluded from sites. The dismissal or exclusion may be due to behaviours that are incompatible with the Statement of HMG Personnel Security and NSV Policy. Such reports must be made immediately and specify the grounds for the dismissal/exclusion.
- 9.5 Dutyholders do not have to report the transfer of NSV clearance holders where there is a change of Vetting Authority as this is managed through NSVS. However, where an NSV clearance holder is transferred between two organisations for which ONR (CNS) is the Vetting Authority, the importing dutyholder is required to report the transfer through the casualty return process.
- 9.6 Dutyholders are required to ensure that overseas travel arrangements for SC and DV holders comply with the Cabinet Office Security Policy Framework Personnel Security Supplement. This guidance provides advice on appropriate briefing arrangements.
- 9.7 Effective ongoing personnel security arrangements involve close cooperation between the Human Resources (including welfare), Occupational Health and Personnel Security departments. Such cooperation will ensure that any information of potential security significance is passed to the Personnel Security Manager. Where medical matters may have security significance, legal obligations with regard to patient confidentiality apply. In order to demonstrate it is lawful to disclose medical information to the ONR (CNS) vetting authority, the doctor or medical staff will need to balance the need to disclose personal data with the privacy of the individual.
- 9.8 Certain matters that affect NSV clearance holders are likely to be of interest to the ONR (CNS) Vetting Authority. Thus a dutyholder's arrangements should facilitate, where known, their reporting to ONR (CNS). Such matters include serious criminal offences, illness, disciplinary sanction, financial difficulties and others. A broad illustrative but not exhaustive list of examples of such matters is:
- **Criminal Offences.** The change of personal circumstances questionnaire: criminal conviction/arrest/caution should be completed where a person holds a DV, SC or CTC security clearance and the individual is arrested, refused bail, receives a police caution, reprimand or final warning or convicted of an offence (other than minor road traffic offences).(Ref 22)
 - **Illnesses.** Psychological disorders or other medical conditions where symptoms may include an occasional loss of consciousness or physical weakness indicating vulnerability in a post requiring a security clearance. The need to notify should

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take into account whether the symptoms are minor or transitory in nature; the interface between symptoms, functioning, situation and behaviour; and how well the disorder is being managed.

- **Disciplinary.** Issues which suggest a poor or cavalier attitude towards security; decline in performance at work, friction with colleagues, disillusionment or dissent; gambling, alcohol or drugs; conflicts of interest; criminality.
- **Financial (SC and DV holders only unless indicative of fraudulent activity) –** bankruptcy orders; trust deeds; debt relief orders; attachment of earnings orders; County Court Judgements; Individual Voluntary Arrangements; debt management plans.(Ref 23)
- **General –** change of partner (living as a couple) for NSV clearance holders; change of co-residents (DV only); naturalisation; change of name.(Ref 20)

- 9.9 Reporting on these matters should be proportionate to the level of clearance held. However, there may be occasions where the process relates to a less serious potential stressor or vulnerability, and a dutyholder's arrangements should factor this in. For example, accessing mainstream 'adult' websites in the workplace may be a disciplinary matter, but it would not in all likelihood be a security concern unless an individual felt disaffected through the subsequent disciplinary process. Similarly, an arrest, potentially resulting in an impending prosecution is likely to prove stressful and could be a vulnerability. Dutyholders are required to consider whether behaviours or life events suggest incompatibility with the expected behaviours in the "Statement of HMG Personnel Security and NSV Policy." If this is the case their arrangements should ensure such concerns are reported to the ONR (CNS) vetting authority. Concerns in relation to BPSS holders will generally be managed by dutyholders as an employment issue unless they constitute a potential threat to national security.
- 9.10 The dutyholder's arrangements should take account of the fact that individuals who are subject to, or who believe they are subject to, inappropriate behaviours may feel marginalised. Such behaviours may include harassment and bullying or other unfair treatment because of gender, religion, sexuality, work pattern or race etc. Such issues, together with the potential security implications, should be resolved at the earliest opportunity.
- 9.11 NSV clearance holders are made aware of their responsibilities for reporting any significant change in their personal circumstances (see paragraphs 8.1 and 8.2 above). Dutyholders are likely to become aware of some reportable changes through notifications of a change of name or pension benefit nominee etc. They should have a process in place to remind individuals to follow the mandated reporting process for any change of personal circumstances.
- 9.12 ONR cannot mandate the use of an ASAF for SC holders and for CTC holders by dutyholders. However, inspectors should look favourably on dutyholders who adapt the DV ASAF to make it relevant for CTC and SC holders e.g. an ASAF for a CTC and SC holder does not require the disclosure of a new co-resident. In addition, dutyholders should ensure that CTC and SC holders are not under the impression the completion of an ASAF is mandatory unless this has been made a condition of the clearance by ONR. The ASAF form promotes an effective security culture and can assist them in addressing potential areas of concern. Where dutyholders adopt a non-mandated SC and CTC ASAF, the completed returns should not be forwarded to ONR unless security concerns are identified.

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- 9.13 Concerns identified through the NSV process, or through ongoing personnel security arrangements, will not necessarily result in the ONR (CNS) Vetting Authority deciding to deny or withdraw an NSV. Where possible, concerns may be addressed through the application of caveats. For example where a medical issue may mean an individual is likely to lose consciousness, the ONR (CNS) vetting authority will apply a caveat of “No singleton/isolationist posts”. The dutyholder’s arrangements must be capable of effectively managing such caveats and ensuring that all relevant parties are notified. The most frequently used caveats are listed at Appendix 5.
- 9.14 The dutyholder’s arrangements should allow for line managers, including those in the supply chain, to be briefed and updated on their responsibilities. This should include circulating relevant documents at appropriate intervals. For example the Line Manager’s Guide - appendix 8 of the Cabinet Office Personnel Security supplement to the SPF and the HMG Maintaining Security Clearances – A guide for line managers and supervisors.
- 9.15 Dutyholder arrangements should adequately cover remote working i.e. those members of the workforce who work away from the organisation’s main site, for which CPNI guidance is available (Reference 24).

Inspectors should consider:

- Is there a process to report information which affects the integrity of the clearance record on the NSVS to the ONR (CNS) Vetting Authority?
- Do the relevant dutyholder departments, i.e. Security, HR, OH and line managers (including those in the contractor community), recognise which events have the potential to raise a security concern and/or which require reporting to the ONR (CNS) Vetting Authority for the revalidation of a NSV clearance?
- Does the dutyholder promote effective personnel security through using non-mandated ASAFs and by delivering personnel security themed campaigns?
- Does the dutyholder understand where personnel security responsibility sits within its supply chain organisations and how those organisations promote ongoing personnel security?

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10. REFERENCES

1. **Nuclear Industries Security Regulations 2003.** Statutory Instrument 2003 No. 403
2. **Nuclear Industries Security (Amendment) Regulations 2006.** Statutory Instrument 2006 No. 2815
3. **Nuclear Industries Security (Amendment) Regulations 2013.** Statutory Instrument 2013 No. 190
4. **Convention on the Physical Protection of Nuclear Material (CPPNM)**
<https://ola.iaea.org/ola/treaties/documents/FullText.pdf>
5. **Nuclear Security Series 20 - IAEA Nuclear Security Fundamentals** http://www-pub.iaea.org/MTCD/Publications/PDF/Pub1590_web.pdf
6. **IAEA Nuclear Security series No 7 – Nuclear Security Culture** www-pub.iaea.org/MTCD/publications/PDF/Pub1347_web.pdf
7. **IAEA Nuclear Security Series No 8 – Preventative and Protective Measures against Insider Threats** www-pub.iaea.org/MTCD/publications/PDF/pub1359_web.pdf
8. **National Objectives, Requirements and Model Standards.** October 2012. Trim Folder 4.4.2.11304.
9. **HMG Security Policy Framework.**
10. **NISR 2003 Classification Policy** – Trim Ref. 2012/243357.
11. **HMG Baseline Personnel Security Standard – Guidance on the pre-employment screening of civil servants, members of the armed forces, temporary staff and government contractors**
www.gov.uk/government/uploads/system/uploads/attachment_data/file/365602/HMG_Baseline_Personnel_Security_Standard.pdf
12. **HMG Personnel Security Controls -**
www.gov.uk/government/uploads/system/uploads/attachment_data/file/299547/HMG_Personnel_Security_Controls.pdf
13. **Centre for the Protection of National Infrastructure – Ongoing Personnel Security**
<https://www.cpni.gov.uk/system/files/documents/d0/d2/ongoing-personnel-security-a-good-practice-guide-edition-3.pdf>
14. **Counter Terrorist Check / Security Check Questionnaire**
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/585924/2016_0927-Form_NSV001_v0.2-U.pdf
15. **Developed Vetting Questionnaire**
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/585926/2016_0927-Form_NSV002_v0.2-U.pdf
16. **INFCIRC/225 IAEA – The Physical Protection of Nuclear Material**
<https://www.iaea.org/publications/documents/infcircs/physical-protection-nuclear-material>

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17. **Cabinet Office SPF Personnel Security supplement, version 6.4, dated November 2015. (OFFICIAL – SENSITIVE).**
18. **HMG Maintaining Security Clearances - A guide for staff and contractors**
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/418619/20150327- Maintaining Security Clearances - Staff guidance FINAL.pdf
19. **HMG Maintaining Security Clearances – A guide for line managers or supervisors of staff**
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/418622/20150327- Maintaining Security Clearances - Managers guidance FINAL.pdf
20. **Change of Personal Circumstances Questionnaire (Domestic Arrangements)**
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/303400/20140325-FormNSV004-U.pdf
21. **Change of Personal Circumstances Questionnaire (Nationality)**
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/558396/20160624-Change_of_Personal_Circumstances_Questionnaire_Nationality.pdf
22. **Change of Personal Circumstances Questionnaire (Convictions)**
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/558372/20160624-Change_of_Personal_Circumstances_Questionnaire_Convictions.pdf
23. **Change of Personal Circumstances Questionnaire (Finances)**
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/564749/FormNSV003_v0_2.pdf
24. **Centre for the Protection of National Infrastructure – Personnel Security in Remote Working A Good Practice Guide**
<https://www.cpni.gov.uk/system/files/documents/af/05/personnel-security-in-remote-working-a-good-practice-guide.pdf>

Note: ONR staff should access the above internal ONR references via the How2 Business Management System.

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| | |
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| ASAF | Annual Security Appraisal Form |
| BPSS | Baseline Personnel Security Standard |
| CNS | Civil Nuclear Security |
| CPC | Change of Personnel Circumstances |
| CPNI | Centre for the Protection of Nuclear Infrastructure |
| CPPM | Convention of the Physical Protection of Nuclear Material |
| CTC | Counter Terrorist Check |
| DBS | Defence Business Services |
| DV | Developed Vetting |
| EEA | European Economic Area |
| EU | European Union |
| HMG | Her Majesty's Government |
| HR | Human Resources |
| IAEA | International Atomic Energy Agency |
| NATO | North Atlantic Treaty Organisation |
| NIMCA | Nuclear Industries Malicious Capabilities Planning Assumptions |
| NISR | Nuclear Industries Security Regulations |
| NM | Nuclear Material |
| NORMS | National Objectives, Requirements and Model Standards |
| NSSP | Nuclear Site Security Plan |
| NSV | National Security Vetting |
| NSVS | National Security Vetting Service |
| OH | Occupational Health |
| ONR | Office for Nuclear Regulation |
| ONR (CNS) | Office for Nuclear Regulation (Civil Nuclear Security) |
| ORM | Other Radioactive Material |
| SC | Security Check |
| SNI | Sensitive Nuclear Information |
| SPF | Security Policy Framework |
| SQEP | Suitably Qualified and Experienced |
| SyAPs | Security Assessment Principles |
| TAG | Technical Assessment Guide |
| TSS | Transport Security Statement |
| UK | United Kingdom |

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APPENDIX 1 – EXCERPT FROM NISR 2003 CONCERNING WORKFORCE TRUSTWORTHINESS

Regulation 9: “The responsible person in relation to each nuclear premises must ensure that each of his relevant personnel in relation to the premises who -

- a) Is specified in the approval security plan for the premises as requiring investigation and assessment as mentioned in regulation 4(3)a, or
- b) Falls within a description of persons who are so specified,

is a person who has been assessed, in accordance with a process that has been approved by the ONR, to be of suitable character and integrity, having regard to the need to ensure the security of the premises and the material, equipment and information mentioned in regulation 4(2).

Regulation 17(3): “An approved carrier must ensure that each of his relevant personnel who-

- a) Is specified in his approved transport security statement as requiring investigation and assessment as mentioned in regulation 16(3)(a), or
- b) Falls within a description of persons who are so specified,

is a person who has been assessed, in accordance with a process that has been approved by the ONR, to be of suitable character and integrity, having regard to the need to ensure the security of the material, information and premises mentioned in Regulation 16(3)(a).

Regulation 22(7)(d): “A person to whom this regulation applies must – ensure that each of his relevant personnel who-

- (i) Is specified in a direction given under paragraph (7)(b) as a person whose suitability requires investigation and assessment by the Secretary of State; or
- (ii) Falls within a description of persons who are so specified,

is a person who has been assessed, in accordance with a process that has been approved by the ONR, to be of suitable character and integrity, having regard to the need to ensure the security of any sensitive nuclear information, uranium enrichment equipment or software within the possession or control of the person to whom this regulation applies.

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APPENDIX 2 – DV SECURITY APPRAISAL FORM

Personnel Security,
Office for Nuclear
Regulation (Civil
Nuclear Security),
4N.3,
Redgrave Court,
Merton Road,
Bootle,
Merseyside, L20 7HS

| | |
|---|---------------------------------------|
| <u>FOR OFFICIAL USE ONLY</u> | |
| ONR (CNS): Via Personnel Security Manager for: | |
| | |
| | |
| | |
| Telephone Number: | Date Issued:/...../..... |

SUBJECT’S DEVELOPED VETTING SECURITY APPRAISAL FORM

| | |
|--|-------------------|
| <u>TO BE COMPLETED BY THE PERSONNEL SECURITY MANAGER</u> | |
| Subject's Full Name: | Vet Number: |
| Current Work Address: | |
| Date of BirthPeriod of Security Appraisal: From.../...../..... To: .../...../..... | |

Completing an annual DV security appraisal is a requirement in order to retain your security clearance. The process provides assurance to yourself, your line manager/ supervisor/security controller and the organisation in which you are based that your actions and behaviours are consistent with the level of access entrusted to you.

Once your completed Security Appraisal Form has been received your file will be updated. Security teams/controllers or vetting officers may need to make follow-up enquiries concerning information that you provide, particularly where your personal circumstances have changed

Please complete and return Part ONE before passing Part TWO to your line manager or supervising officer (if you have worked for your current manager for less than 12 months please ensure that your current manager has the opportunity to speak to your previous manager/supervisor).

Please contact your Personnel Security Manager if you have any questions relating to any aspect of this form or the annual security appraisal process.

You should be aware that failure to complete this form and return it to your local security unit/controller (or direct to the relevant vetting provider) within the specified deadlines could result in withdrawal of your security clearance.

OFFICIAL**PART ONE****1. Posts and Supervisors/Managers**

Please list all the posts that you have held during the appraisal period shown above, giving details of your supervisor in each (attach an additional sheet if necessary).

| Title of Post/Section | Dates (approximate) | NAMES OF ALL SUPERVISORS/MANAGER IN THE PERIOD OF THIS SECURITY APPRAISAL AND CONTACT DETAILS |
|---------------------------------|----------------------------|--|
| | | |
| | | |
| | | |
| CONTRACTORS COMPANY NAME | | |

2. RECORDING OF EVENTS OVER THE LAST TWELVE MONTHS

Please tick the appropriate box. If you answer yes to any question please expand on your answer in the free text field at Section 3. You are reminded that there are mandatory reporting processes through your Personnel Security Manager where you have a change of partner; change of co-residents or travel overseas.

Over the last twelve months

- | | Yes | No |
|--|--------------------------|--------------------------|
| a) Have you established a relationship with a person with whom you live as a couple and who has not previously been declared (includes marriage and civil partnership)? | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Has anyone moved into your home (owned or rented and aged 18 yrs or over) who have not previously been declared (includes domestic staff, lodgers, children coming of age)? | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Have you travelled to countries outside of the UK, EEA, EU, or NATO either on business or pleasure? (A list of these countries will be held by your Personnel Security Manager) | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Have you experienced/are you experiencing any serious personal difficulties (eg ill health, legal troubles, domestic/marital problems) | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Has the amount of alcohol you regularly consume increased? | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Please estimate the number of units of alcohol that you regularly consume in a week _____ | | |
| g) Have you experienced an alcohol-related illness or has your performance at work been affected by your consumption of alcohol? | <input type="checkbox"/> | <input type="checkbox"/> |
| h) Have you taken illegal drugs or had any issue with prescription medication? | <input type="checkbox"/> | <input type="checkbox"/> |
| i) Have you sought medical advice or received treatment for alcohol or drug use/addiction? | <input type="checkbox"/> | <input type="checkbox"/> |
| j) Have you associated with any political or religious group that have views which conflict with your employers values, goals or policies (includes any conversations or contact either in person, by phone, through social media or any other route)? | <input type="checkbox"/> | <input type="checkbox"/> |
| k) Do you or any of your close family or friends have associations (including overseas connections) with individuals, organisations that could cause concern | <input type="checkbox"/> | <input type="checkbox"/> |

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or be used to place pressure upon you as an individual?

- l) Have you conducted any activity or formed any connections online or through social media etc that could be exploited or used to apply pressure on you?
- m) Have you publicly discussed eg through social media or personal profiles details about your role and/or security clearance which could make you vulnerable to be targeted by an external actor?
- n) Have you engaged in any activity via social media or internet sites that could be used to embarrass or place pressure on you (eg exchange of explicit images)?
- o) Do you have any reservations, moral or otherwise, about any aspect of your work or the wider activities of your employer/government organisation?
- p) Have you been the subject of any disciplinary action, complaint or grievance in this period?
- q) Have you committed any security breaches in this period?

3. If you have answered “Yes” to any of the questions above, please give details below

| Question No | Explanation of why “Yes” was selected to question |
|--|---|
| | |
| | |
| | |
| | |
| <p>I understand my obligation to inform the security vetting authority of any material changes in my circumstances and I have had the opportunity to complete this form in confidence, to place it in a sealed envelope and to elect to send it directly to ONR (CNS). I declare that the information I have given is true and complete to the best of my knowledge and belief. I understand that information provided in the ASAF may be reviewed by ONR (CNS), as the Vetting Authority, or DBS as the Vetting Authority’s service provider against credit and criminal records routinely checked as part of the vetting process.</p> <p>Signature: Date:/...../.....</p> <p>Telephone Number: E Mail Address:</p> | |

What happens next?

Once you have completed this form, please return it in accordance with local arrangements to your line manager/supervisor or the Personnel Security Manager whose address is shown at the top of page.

There may be occasions, particularly owing to sensitivity, where you would rather report matters directly to the ONR (CNS) as the Vetting Authority for the Civil Nuclear Industry. In this instance you may forward this PART ONE directly to ONR (CNS) (whose address is at top of this form) and forward the attached notification to your Personnel Security Manager

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to say you have done so. YOU SHOULD NOT SEND THE SAF DIRECTLY TO ONR (CNS) WHERE YOU ANSWER “NO” TO EACH QUESTION OR WHERE “YES” IS ANSWERED ONLY TO QUESTIONS a-c.

Where you send this PART ONE directly to ONR (CNS), ONR (CNS) will share information in relation to questions a-c as there are mandatory reporting requirements associated with these. Occasionally, further contact may need to be made, by telephone or interview, to clarify the information provided. More often than not, no further action will be required until your next Security Appraisal or DV review; however, your responsibilities as a DV clearance holder continue and if there are any concerns about your suitability to retain your National Security Vetting Clearance the Vetting Authority [ONR (CNS)] may review your case at any time. You are reminded that if you do not complete this Security Appraisal it may result in your DV National Security Vetting Clearance being suspended and your site access withdrawn pending receipt of the completed form.

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SECURITY APPRAISAL FORM

Part One

complete

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Notification to Personnel Security Manager of submission of PART ONE of DV SAF directly to ONR (CNS).

**To – Personnel Security Manager
[Site Address]**

I have elected to return PART ONE of my DV SAF directly to ONR (CNS).

Signature -

Name (In Block Capitals) -

Staff Number -

Telephone Number -

Date -

OFFICIAL

SECURITY APPRAISAL FORM

**Notification to Personnel Security Manager of submission
of PART ONE of DV SAF directly to ONR (CNS)**

complete

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Personnel Security,
Office for Nuclear Regulation (Civil Nuclear Security),
4N.3,
Redgrave Court,
Merton Road,
Bootle,
Merseyside, L20 7HS

SUPERVISOR DEVELOPED VETTING SECURITY APPRAISAL FORM

TO BE COMPLETED BY THE PERSONNEL SECURITY MANAGER

Subject's Full Name:
Vet Number:
Current Work Address:
Date of birth:.....
Period of Security Appraisal: From:/...../..... To:/...../.....
Form Issued on/...../.....

The subject's annual Security Appraisal is now due. These appraisals are conducted because:

- The subject's security file needs to be updated with any changes in his / her personal circumstances.
- They provide the opportunity to identify/review any issues concerning the subject which may relate to security.

This form is in two parts. PART ONE is for separate completion and return by the subject. You have been selected to complete PART TWO because you have been his / her supervisor or manager for the greatest part of the appraisal period shown above. As supervisor/manager, you are responsible for monitoring the personal circumstances and behaviour of your staff in order to give early warning of potential security problems and help avoid them. Completion of this form is an important part of that process.

PART TWO

1.

a. For what period has the subject worked under your supervision/management?

From:/...../..... To:/...../.....

b. How much contact do you have with the subject at work

Daily Weekly Less frequently than weekly

c. If you are not the line manager/supervisor, please explain your relationship with the subject:

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- | 2. | Yes | No |
|---|--------------------------|--------------------------|
| a) Has the subject had a change of job role which means they no longer require their current DV level of clearance? | <input type="checkbox"/> | <input type="checkbox"/> |
| b) Would you have reservations about supervising the subject again? | <input type="checkbox"/> | <input type="checkbox"/> |
| c) Does the subject demonstrate a low level of motivation and feel that their contribution is undervalued? | <input type="checkbox"/> | <input type="checkbox"/> |
| d) Does the subject show conflict with management/colleagues? | <input type="checkbox"/> | <input type="checkbox"/> |
| e) Is the subject a loner? | <input type="checkbox"/> | <input type="checkbox"/> |
| f) Is the subject unable to take constructive criticism? | <input type="checkbox"/> | <input type="checkbox"/> |
| g) Does the subject lack reliability, stability & discretion? | <input type="checkbox"/> | <input type="checkbox"/> |
| h) Is the subject unable to cope with pressure? | <input type="checkbox"/> | <input type="checkbox"/> |
| i) Does the subject show a poor attitude to security? | <input type="checkbox"/> | <input type="checkbox"/> |
| j) Has the subject committed any security breaches? | <input type="checkbox"/> | <input type="checkbox"/> |
| k) Have you noticed any change in the subject behaviour or approach to work? | <input type="checkbox"/> | <input type="checkbox"/> |

Has the subject shown any evidence of:

- | | | |
|--|--------------------------|--------------------------|
| l) Associations or contact with subversive organisation of British or foreign origin? | <input type="checkbox"/> | <input type="checkbox"/> |
| m) Misuse of drugs? | <input type="checkbox"/> | <input type="checkbox"/> |
| n) Misuse of alcohol? | <input type="checkbox"/> | <input type="checkbox"/> |
| o) Unreliability/dishonesty/untrustworthiness/indiscretion? | <input type="checkbox"/> | <input type="checkbox"/> |
| p) Significant financial difficulties or inexplicable affluence? | <input type="checkbox"/> | <input type="checkbox"/> |
| q) Conduct liable to lead to vulnerability or blackmail (e.g. sexual or other)? | <input type="checkbox"/> | <input type="checkbox"/> |
| r) Illness, including mental illness, or use of prescribed drugs which might adversely affect judgement? | <input type="checkbox"/> | <input type="checkbox"/> |
| s) Are you aware of any other grounds that might cast doubt on the subject's suitability for continued DV clearance? | <input type="checkbox"/> | <input type="checkbox"/> |
| t) Is there any matter which you would like to discuss personally with the vetting authority? | <input type="checkbox"/> | <input type="checkbox"/> |
| u) Is input from another supervisor/ manager needed to give a full and accurate picture of the subject? | <input type="checkbox"/> | <input type="checkbox"/> |

3. If you have answered "Yes" to any of the questions above, please give details below**OFFICIAL**

OFFICIAL

| Question Number | Explanation of why "Yes" was selected to question |
|-----------------|---|
| | |
| | |
| | |
| | |

| | |
|------------------------------|---|
| Signature | Date:/...../..... |
| Name in Block Letters: | Telephone Number (including dialling code): |
| e-mail address: | |

What happens next?

TO BE COMPLETED BY THE PERSONNEL SECURITY MANAGER

ADDRESS TO WHERE DV SAF PART TWO (AND PART ONE WHERE HANDED TO YOU) IS TO BE RETURNED

Address:

.....

.....

Once you have completed this form, please return it in accordance with local arrangements, within fourteen days of receipt, to the Personnel Security Manager whose address is shown above. **However, there may be occasions, owing to sensitivity, where you would rather report matters directly to the ONR (CNS) as the Security Regulator and Vetting Authority for the Civil Nuclear Industry in which instance you may forward this PART TWO directly to ONR (CNS) at the address shown at the top of this form and forward the attached notification to your Personnel Security Manager to say you have done so. YOU SHOULD NOT SEND THE SAF DIRECTLY TO ONR (CNS) WHERE YOU ANSWER "NO" TO EACH QUESTION.**

REMINDER

This information is strictly for National Security Vetting purposes; however, in accordance with the policies of your employer you may have an obligation to report some information or concerns to an appropriate person within that organisation.

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SECURITY APPRAISAL FORM

Part Two

complete

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OFFICIAL

Notification to Personnel Security Manager of submission of PART TWO of DV SAF directly to ONR (CNS).

**To – Personnel Security Manager
[Site Address]**

I have elected to return PART TWO of the DV SAF for –

Name –

Staff Number -

directly to ONR (CNS).

Own Signature -

Own Name (In Block Capitals) -

Own Staff Number -

Own Telephone Number -

Date -

SECURITY APPRAISAL FORM

**Notification to Personnel Security Manager of submission
of PART TWO of DV SAF directly to ONR (CNS)**

complete

APPENDIX 5 – STAFF & CONTRACTOR STATUS CHANGES (CASUALTY RETURN) NOTIFICATION

Operator -

Site -

Month and Year -

To be submitted monthly for all NSV holders with a change in employment status or any naturalisation where ONR (CNS) has approved the clearance. **NIL returns are not required.** A return does not need to be made where a person transfers site so long as they remain with the same operator and there has been no change in their staff or contractor status.

| ONR Vet No | Subject Surname | Subject Forename | Date of Birth | Full Description of Change* | Future status i.e. staff, contractor or N/A | Date of Change |
|------------|-----------------|------------------|---------------|-----------------------------|---|----------------|
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*Descriptors to be used should be along the lines of – Change of name as a result of [marriage, deed poll – and then give new name in full], Clearance downgrade from [level] to [level], Civil nuclear clearance received from [operator], Civil nuclear clearance transferred to [operator], Contractor becoming staff, Death, Dismissal, End of contract, Gender Reassignment, Naturalised British, Not taken up, Resignation, Retirement, Staff becoming contractor [Give contractor company].

Dismissals require an additional report as the clearance may need to be formally withdrawn. Naturalisations require a certified copy of the naturalisation certificate. Change of name where a COPC questionnaire is not applicable shall require, for example, a copy of the deed poll. Clearances transferred into or out of the civil nuclear industry do not need to be notified as this will be managed on a Vetting Authority to Vetting Authority basis.

The return is to be e-mailed to ONR. ONR CNS does not issue replacement NSV certificates as a result of this information.

Where a clearance is downgraded, the sponsor is required to notify the holder of that clearance.

APPENDIX 6 – EXPLANATION OF CAVEATS

When granting clearances at NSV level, ONR (CNS) will sometimes apply caveats. The responsibility for maintaining caveats rests with the civil nuclear operator. In BPSS cases, sometimes restrictions on posts may be applied to address proliferation sensitive concerns. Dutyholders may themselves apply caveats relating to conditions of employment. The implications of ONR (CNS)-applied caveats are given below:

Subject to SAF Cover

All DV holders are subject to mandated annual SAF cover, and CTC and SC holders are on a non-mandated basis. Sometimes a caveat may be applied “subject to six-monthly SAF cover”. This caveat is usually applied where ONR (CNS) has aftercare concerns.

No access is to be granted to material bearing the caveat “UK Eyes Only”

This caveat applies to all non-British Citizens. In some instances it will be applied to dual/former nationals where there may be loyalties to that other country or vulnerability owing to family connections.

No isolationist/singleton postings

This will be applied particularly where there are concerns with an individual’s health or well-being. It does not mean that the individual cannot work unsupervised but a supervisor must be in regular contact with the subject and the subject has ready access to a supervisor. The supervisor must have a watching brief.

This clearance is not transferable between posts or sites without reference to ONR (CNS) (or variances of this)

Applied where there may be a proliferation concern and those, for example, who may have a conscientious objection working in some posts.

Subject to Enhanced Random Drug/Alcohol Testing

This is applied where ONR (CNS) has knowledge of unlawful substances, misuse of prescription medication, and/or a misuse of alcohol. Determining the periodicity and frequency of testing is the responsibility of the sponsor.

Subject to providing a Basic Disclosure every # months for # years

This is applied where ONR (CNS) has concerns about an individual’s criminal record.

Subject to financial review

This is applied where ONR (CNS) has concerns in relations to the way the subject manages their finances.