



OFFICIAL

ONR GUIDE			
POLICING AND GUARDING			
Document Type:	Nuclear Security Technical Inspection Guide		
Unique Document ID and Revision No:	CNS-INSP-GD-9.0 Revision 1		
Date Issued:	January 2018	Review Date:	January 2022
Approved by:	Matt Sims	Professional Lead Security Specialism	
Record Reference:	2021/7952		
Revision commentary:	Administrative review only pending in depth analysis of Inspector survey responses		

TABLE OF CONTENTS

1	INTRODUCTION	2
2	PURPOSE AND SCOPE	2
3	SUMMARY OF FUNDAMENTAL SECURITY PRINCIPLE 9: POLICING AND GUARDING	3
4	PURPOSE OF FUNDAMENTAL SECURITY PRINCIPLE 9	4
5	GUIDANCE ON ARRANGEMENTS FOR INSPECTING (POLICING AND GUARDING) – GENERAL CONSIDERATIONS.....	4
6	GUIDANCE ON INSPECTION OF (POLICING AND GUARDING) ARRANGEMENTS AND THEIR IMPLEMENTATION	6
7	CNC RESPONSE	7
8	POLICE SUPPORT TO THE DUTYHOLDER	9
9	CIVILIAN GUARD FORCE.....	10
10	FURTHER READING	12

OFFICIAL**1 INTRODUCTION**

- 1.1 The Nuclear Industries Security Regulations (NISR) 2003 contains requirements for responsible persons to make certain arrangements including standards and procedures to ensure the security of the nuclear premises, Nuclear Material (NM) or Other Radioactive Material (ORM) stored on the premises, Sensitive Nuclear Information (SNI) and standards and procedures for the transportation of Category I - III NM.
- 1.2 Regulation 4 of NISR requires there to be an approved security plan for each nuclear premises¹ which details those arrangements for the protection of NM/ORM and SNI, including contingency plans. Regulation 7 places the requirement for the dutyholder to maintain arrangements in accordance with the approved plan. Similarly, transporters of Category I-III quantities of NM are required to detail their security arrangements in an approved Transport Security Statement in accordance with Regulation 16 and Regulation 17 requires them to maintain those arrangements. For the purposes of this guide, the term security plan will be used to refer to both approved documents.
- 1.3 The Office for Nuclear Regulation (ONR) has established a set of outcome focused Security Assessment Principles (SyAPs) (Reference 10.1) which provide a framework for it to assess security arrangements defined in security plans and make consistent regulatory judgements on the adequacy of those arrangements. The Fundamental Security Principles (FSyPs) and their underpinning Security Delivery Principles (SyDPs) are goal-setting and do not describe what the dutyholder's arrangements should contain; this is the responsibility of the dutyholders who remain responsible for security.
- 1.4 To assist inspectors, ONR produces a suite of guides to assist them in making regulatory judgements and decisions in relation to the adequacy of compliance. This inspection guide is one of the suite of documents provided by ONR for this purpose.

2 PURPOSE AND SCOPE

- 2.1 Security plans should be structured in a format consisting of high-level claims, supported by arguments substantiated by evidence. Where the dutyholder is required to have an approved security plan, the purpose of this guide is to facilitate a consistent and effective approach to inspecting compliance with the arrangements described in the plan and detailed in the underpinning documentation concerning FSyP 9 – Policing and Guarding. For the purposes of this TIG, the term 'relevant police force' is used to encompass the range of police forces with which the dutyholder may need to engage such as the Home Office Police, Police Scotland and the British Transport Police.
- 2.2 The judgements made by the inspector will primarily relate to the efficacy of the implementation of arrangements described in evidence that supports the security plan to ensure that associated arguments are fully substantiated. However, ONR takes a sampling approach to regulation and it is possible that elements of evidence within the plan or underpinning the plan were not subject to assessment as part of the approval process. Therefore, when reviewing or inspecting evidence as part of the intervention, the judgement may relate to the adequacy of the arrangements which support the approved plan. The inspector may also provide advice and guidance in the interests of encouraging dutyholders to seek continuous improvement.

¹ As defined by Regulation 2 of NISR 2003.

OFFICIAL

OFFICIAL

- 2.3 The guidance should not be regarded as either comprehensive or mandatory, but provides a framework for inspectors on which to base their judgements and discretion during such inspections.
- 2.4 This guidance considers arrangements across levels 1 – 2 of the Five Levels of Security Defence in Depth (KSyPP4), Levels 3 – 5 of KSyPP4 are covered in the CNS-INSP-GD-010 – Emergency Preparedness and Response. For levels 1 – 2, this guidance considers the effectiveness of the dutyholder’s arrangements for setting the conditions to deliver an appropriate security regime and a timely response to a malicious event. The guidance should be considered with regard to the successful delivery of the appropriate security outcome and response effect.
- 2.5 The guidance does not specify when or to what extent these compliance inspections should be made. These matters are covered in the integrated intervention strategy and individual inspectors’ inspection plans that take account of various relevant factors.
- 2.6 This guidance can be used to make a judgement against FSyP 9 as a whole or a single SyDP depending on the aim of a particular intervention. Inspectors should, however, confirm that all relevant aspects of these arrangements exist and can be delivered effectively.
- 2.7 The guidance consists of three main elements to help inspectors plan their intervention programmes and conduct Policing and Guarding compliance inspections. Section 4 provides a brief overview of the SyAPs objectives for Policing and Guarding to help inspectors understand the scope of the arrangements needed to fulfil the requirements of FSyP 9 or parts thereof. Section 5 provides more detailed guidance that inspectors should use to judge the adequacy of the dutyholder’s arrangements across the breadth of FSyP 9. Section 6 signposts specific guidance for the inspectors to consider for SyDPs 9.1 – 9.3. It also offers practical guidance on the approaches to be considered for the organisation and delivery of inspections.
- 2.8 This TIG is supported by the following TAG’s
- CNS-TAST-GD-9.1 – Civil Nuclear Constabulary Response Force.
 - CNS-TAST-GD-9.2 – Local Police Operations to Support the Dutyholder.
 - CNS-TAST-GD-9.3 – Security Guard Services.
- 2.9 Relevant aspects from the full range of CNS TIG’s should be considered and used in support of an inspection.
- 2.10 The guidance in the document is consistent with International Atomic Energy Agency (IAEA) Nuclear Security Series No. 13 and Nuclear Security Recommendations on Physical Protection of Nuclear Material and Nuclear Facilities (INFCIRC/225/Revision 5) (Reference 10.3) dated January 2011
- 2.11 The guidance in the document is also consistent with IAEA Nuclear Security Series No. 20 - Objective and Essential Elements of a State’s Nuclear Security Regime (Reference 10.4).
- 3 SUMMARY OF FUNDAMENTAL SECURITY PRINCIPLE 9: POLICING AND GUARDING**

OFFICIAL

OFFICIAL

- 3.1 FSyP 9 - Dutyholders must demonstrate effective guarding and policing arrangements, integrating the operations of relevant police forces (e.g. Civil Nuclear Constabulary (CNC), British Transport Police (BTP)) and security guard services.
- 3.2 SyDP 9.1 – CNC Response Force: Dutyholders should facilitate CNC deployment that is appropriate to achieve the required security outcome.
- 3.3 SyDP 9.2 – Local Police Operations in Support of the Dutyholder: Dutyholders should facilitate local police forces' provision of support by way of assistance to the CNC or delivering a response to the site in respect of terrorist, criminal or protest activity.
- 3.4 SyDP 9.3 – Security Guard Services: Dutyholders should employ civilian security guards to provide the unarmed guarding that conducts nuclear security operations as described in the site security plan such as patrolling, access control and searching; and, who deliver or enable an immediate response to a security event.

4 PURPOSE OF FUNDAMENTAL SECURITY PRINCIPLE 9

- 4.1 FSyP 9 places a regulatory expectation on the dutyholder that their Policing and Guarding operational arrangements are fully integrated so as to create a security regime that can effectively deliver the appropriate Physical Protection System (PPS) security outcome and response effect. The arrangements should be underpinned by agreed command protocols, effective liaison and stakeholder engagements, aligned working policies and procedures and integrated training. Each element should be aware of the others' statutory responsibilities and operational capability.
- 4.2 SyDP 9.1 places a regulatory expectation on the dutyholder to demonstrate in their security plan how their security arrangements incorporate and facilitate a CNC armed response that is capable of achieving the required PPS outcome. It should cover CNC involvement in all relevant operational/plant aspects that may impact on the effectiveness of their armed response.
- 4.3 SyDP 9.2: places a regulatory expectation on the dutyholder to demonstrate within their security plan how they implement arrangements that facilitate local police force operations in response to security events at their site.
- 4.4 SyDP 9.3: places a regulatory expectation on the dutyholder that demonstrates within their security plan how they implement and maintain guard force operations that are fully integrated with relevant stakeholders and the PPS to ensure the required security outcomes are achieved.

5 GUIDANCE ON ARRANGEMENTS FOR INSPECTING (POLICING AND GUARDING) – GENERAL CONSIDERATIONS

- 5.1 The inspector should seek to appropriately evidence the general considerations below.
- 5.2 There is an expectation that arrangements are scalable and proportionate using the graded approach to deliver the appropriate PPS Outcome, Response Effect and meet relevant legal requirements; the inspector should verify that this is delivered. PPS outcomes are covered in more detail within the CNS-INSP-GD-006 – Physical Protection System.
- 5.3 There should be an expectation that arrangements are effective across the relevant levels of Security Defence in Depth (KSyPP4). The inspector should consider the

OFFICIAL

OFFICIAL

- effectiveness of the dutyholder's arrangements in setting the conditions to deliver an appropriate security regime and timely response.
- 5.4 The inspector should consider how Policing and Guarding arrangements are fully integrated in order to deliver an effective security regime and timely response and if these arrangements are formalised in Service Level Agreements (SLA's), Memoranda of Understanding (MoU), contractual arrangements or similar. The arrangements should be supported by working processes and procedures that clearly identify responsibilities.
 - 5.5 Command, Control, Communications and the ability to deliver timely and effective situational awareness are key elements in supporting an effective and timely response and the inspector should consider how the dutyholder's arrangements deliver these functions.
 - 5.6 The arrangements should demonstrate that Policing and Guarding numbers and compliments are sufficient to facilitate the range of tasks required to deliver an effective security regime and timely response.
 - 5.7 The inspector should seek to confirm that these arrangements should be underpinned by strong leadership, robust governance and management arrangements, and incorporate effective processes to deliver evidence-based assurance.
 - 5.8 The inspector should review performance management criteria and metrics, checking that they are agreed with all stakeholders and outputs deliver assurance that the routine operational effect is being delivered in a consistent manner.
 - 5.9 The inspector should check arrangements are implemented by effective and timely stakeholder engagements to ensure that the operational effect and PPS outcomes are delivered in an integrated manner.
 - 5.10 The inspector should check that the arrangements to deliver enhanced security measures (Level 2 - KSyPP 4) are scalable, agreed, documented, understood by all stakeholders and tested to ensure the effect can be delivered in a timely manner. Key to this process is the initial notification and reporting arrangements and there should be evidence to confirm that this is routinely tested.
 - 5.11 The inspector should confirm that arrangements are supported by comprehensive change management processes to ensure all stakeholders' individual plans and responsibilities are aligned at all times, amendments are recorded and version control is in place.
 - 5.12 The security arrangements should be reviewed whenever there are changes to the threat, security posture, hazard profile or any other occurrence that warrants consideration and would fundamentally impact upon the PPS or response outcome. Evidence of reviews and changes in posture should be available for inspection.
 - 5.13 In addition to reviewing arrangements in the event of significant change, the arrangements should be routinely reviewed to ensure that they remain valid and that no omissions or inaccuracies exist.
 - 5.14 The inspector should review the arrangements for the capture of OPEX and subsequent amendment to policing and guarding arrangements based on this when appropriate.

OFFICIAL

OFFICIAL

- 5.15 The inspection should confirm that relevant aspects of SyDP's 5.1, 5.2 and 5.3 have been fully considered; particularly the Systems and Structures necessary to deliver these arrangements are supported by Examination, Inspection, Maintenance & Testing (EIMT) processes and procedures with appropriate evidence available for assurance purposes.
- 5.16 Modifications to Systems and Structures necessary to deliver policing and guarding arrangements should be underpinned by a rigorous process that ensures all stakeholders are engaged, that identified solutions are fully considered, and that the outcome is appropriate to meet the operational need. The production of a comprehensive Operational Requirement document as part of this process is considered as relevant 'good practice'.

6 GUIDANCE ON INSPECTION OF (POLICING AND GUARDING) ARRANGEMENTS AND THEIR IMPLEMENTATION

- 6.1 **Planning** – The inspector should be clear as to the purpose of the proposed intervention and why is it being considered; is it regulatory intelligence, divisional strategy, routine compliance or another reason that is driving it? Once these initial considerations are understood, the inspector should be in a position to define and agree the outcomes and outputs of the intervention. It is important that the inspector refers to the security plan against which the inspection will be conducted for clarity on deliverables and to set the areas to be sampled.
- 6.2 Once the outcomes and outputs of the intervention are defined the inspector will be in a position to identify what resource is needed to deliver them. While it is likely to be ONR resource, support may be required from outside of the security specialism. For further guidance see:
- Compliance Inspection Guide – ONR-INSP-GD-059
 - General Inspection Guide – ONR-INSP-GD-064
- 6.3 **Preparation** – During the preparation phase it may be appropriate for the inspector to obtain supporting evidence and information as it may influence the focus and delivery of the intervention. It is recommended that the scope of an intervention is clearly identified and passed to the dutyholder in good time for them to prepare effectively. Inspectors should also identify who, whether staff and stakeholders, will be seen during the intervention. A representative from CNC HQ at Culham or the Guard Force Contracts Manager may be required to gain a full picture.
- 6.4 **Delivery** – The inspector will need to be clear as to their expectations, how the intervention will be implemented, examples to be considered, areas that require sampling, and the evidence required to be seen / obtained to support outputs and outcomes.
- 6.5 Specific considerations related to the arrangements for the CNC Response are addressed at Part 7. Preparatory evidence may include:
- All relevant MoU's, SLA's or working protocols.
 - CNC counter terrorism patrol measures.
 - CNC and dutyholders' assurance reports.
 - CNC and dutyholders' training records.

OFFICIAL

OFFICIAL

- CNC and dutyholders' working instructions.
 - Deployability and absence records.
- 6.6 Specific considerations related to arrangements for Home Office/Police Scotland/ BTP support are covered at Part 8. Preparatory evidence may include:
- All relevant MoU's, SLA's or working protocols.
 - Minutes from liaison meetings.
 - Minutes from meetings with local Counter Terrorism Security Advisors (CTSAs).
 - Evidence of integrated training and exercising.
 - Working instructions for the receipt of emergency services.
- 6.7 Specific considerations relating to the arrangements for civilian security guarding services are covered at Part 9. Preparatory evidence may include:
- Working protocols and procedures.
 - Contractors and dutyholders' assurance reports
 - Contractors and dutyholders' training records.
 - Delivery metrics.

7 CNC RESPONSE

- 7.1 The following paragraphs provide relevant guidance for those sites whose plan includes an element of CNC response.
- 7.2 MOU's – The inspector should consider reviewing all MOU's, SLA's, working protocols or equivalent that evidence signing party's responsibilities in the provision of an integrated security regime and response. The inspector should be clear that responsibilities have been duly considered and that they deliver the necessary outcomes.
- 7.3 Confirm that there is evidence of routine Strategic, Tactical and Operational stakeholder engagements in order to maintain operational effectiveness and the continued delivery of outcomes. The inspector may consider checking the agenda, minutes, performance indicators presented and actions arising from these engagements.
- 7.4 With respect to the concept of operations, the Inspector should consider:
- Is the approved compliment being maintained in sufficient numbers to deliver the outcomes?
 - Are there sufficient officers who are fully trained to meet their legal obligations as an Authorised Firearms Officer (AFO)?
 - Does the patrol strategy remain extant and is it consistently delivered in a manner that will achieve the required response effect?
 - Are any factors or vulnerabilities that impact on the agreed response timings that underpin the Patrol Strategy?

OFFICIAL

OFFICIAL

- Have the arrangements for leaving site to deliver mutual aid agreements been enacted? Is there clear evidence that agreed protocols are followed and decisions recorded appropriately?
- 7.5 The inspector may consider checking or sampling the following:
- Deployment figures including officers 'out of ticket' or awaiting fitness reviews.
 - Patrol records and patterns.
 - Agreed protocols and procedures for CNC leaving site to deliver mutual aid.
- 7.6 Confirm that the effectiveness of integrated Command, Control and Communications (C3) arrangements is kept under close management supervision. Where gaps in communications to deliver effective Command and Control have been identified, there should be evidence that appropriate working procedures have been implemented.
- 7.7 Is there evidence that all AFO's have received sufficient training on site to meet personal and team responsibilities that enable defined outcomes to be delivered? This includes activity to deliver situational awareness from the police control room, Site Security Control Room (SSCR) or equivalent.
- 7.8 The inspector may consider sampling training objectives, training records, attendance sheets, training material, OPEX.
- 7.9 Is there evidence that good practice has been adopted in the specific control room and that operator working procedures are aligned? Have human factor and ergonomic reviews been conducted?
- 7.10 Is there evidence of sufficient integrated site training to ensure the defined outcomes can be delivered?
- 7.11 The inspector may consider checking or sampling the following:
- Exercise frequency, objectives and outcomes.
 - Attendance and individual training records.
- 7.12 For transport escorts, check that all aspects of the Transport Security Plan have been trained, rehearsed and tested to ensure the defined outcomes can be delivered. Other parts of this section can be applied as necessary to transport moves.
- 7.13 Is there evidence of appropriate off-site stakeholder liaison to ensure stakeholder delivery of defined outcomes? Routine liaison with Home Office/Police Scotland/British Transport Police and meetings with local CTSA's would be examples. Meeting records and actions arising should be evident.
- 7.14 Where transport moves across Police Force boundaries, is there evidence that all appropriate Forces have been engaged and where appropriate formal agreements obtained. Reviewing formal agreements may be considered.
- 7.15 Is there evidence of appropriate functional assurance covering all aspects of operational effectiveness and the delivery of the defined outcomes? Internal assurance reports and where appropriate, the provision of metrics to support assurance processes, could be examined.
- 7.16 Is there evidence that Operational Experience (OPEX) has been effectively captured and disseminated appropriately? The evidence should confirm that OPEX has been

OFFICIAL

OFFICIAL

acted upon where findings have identified a need to do so or if the OPEX directly affects operational capability. If appropriate the security plan or supporting documents should have been amended accordingly.

- 7.17 Assess if operational instructions, working processes and procedures are appropriate and are effectively captured, maintained, reviewed and approved. The inspector may wish to sample records that operational instructions have been read and understood by all necessary personnel.
- 7.18 Has the dutyholder sought evidence that all aspects of SyDP's 5.1, 5.2 and 5.3 have been fully considered and appropriate assurance given by the CNC? Are there records to confirm that assurance?
- 7.19 Where a number of dutyholders are served by a single Operational Unit of CNC, they should ensure that the aspects detailed above can be evidenced by the CNC.
- 7.20 In order to meet their legal obligations, dutyholders should demonstrate how the CNC have been fully embedded into the site health and safety and radiological protection regimes in order to ensure safe and secure operations. The inspector may wish to sample records of briefings and training sessions.
- 7.21 Where supporting structures and systems that are outside the control of the dutyholder, but are required to deliver the CNC operational capability, the dutyholder should demonstrate how they have gained assurance that effective EIMT processes are in place.
- 7.22 Is there evidence of effective procedures to respond to non-compliance of search policies to prevent the theft of NM/ORM or SNI, and the sabotage of NM/ORM or facilities?

8 POLICE SUPPORT TO THE DUTYHOLDER

Inspectors should consider the following:

- 8.1 Does the dutyholder undertake routine liaison activity with relevant police forces to facilitate a mutual understanding of how the anticipated outcomes can be delivered? Routine engagement and a working relationship with the appropriate CTSA will assist this process. Records of these engagements could be checked.
- 8.2 Do the arrangements ensure that the dutyholder and relevant police forces are fully aware of respective statutory responsibilities in delivering the outcome? Are these supported by a formal written undertaking such as a MoU, SLA or equivalent? Statutory responsibilities are covered in the TAGs referenced at 2.7.
- 8.3 Where CNC have responsibilities, is there a MoU between the CNC and other relevant police forces? It should be seen as 'good practice' for the MoU to also include the dutyholder's responsibilities and as a minimum the MoU should be shared with the dutyholder. The Command and Control relationships and defined handover protocols should be detailed. The inspector should consider reviewing the MoU.
- 8.4 Is there a protocol for the dutyholder to inform the relevant police forces that enhanced security measures are to be adopted? Have these measures been discussed with the Police and where necessary supported by agreed local operational policing tactics such as increased external patrolling? The inspector should check the records of these discussions and any agreements forthcoming.

OFFICIAL

OFFICIAL

- 8.5 Are notification arrangements for the implementation of a response by relevant police forces fully embedded in documentation which is subjected to regular checks for validity and version control? Where the notification of relevant police forces is the responsibility of the CNC the arrangements should ensure this is fully understood and documented accordingly.
- 8.6 Do the arrangements demonstrate that the dutyholder fully understands the likely initial relevant police force response to a nuclear security event and how it meets the required security outcome?
- 8.7 Do the arrangements include integrated training arrangements to ensure that the outcomes can be delivered in an effective and timely manner? Are protocols and procedures for the receipt and briefing of the relevant police force fully embedded? Where CNC are involved, are all plans fully aligned? The inspector should consider checking training records, exercises scenarios and objectives, OPEX and alignment of all plans
- 8.8 Does the dutyholder facilitate liaison and familiarisation visits as necessary to enable a more effective and timely police response? The inspector should consider checking records of these visits.
- 8.9 Are there processes and procedures for informing the relevant police force of impending transport moves and is appropriate support delivered in line with the expected outcome?
- 8.10 Is there evidence of effective procedures to respond to non-compliance with search policies to prevent the theft of NM/ORM or SNI, and the sabotage of NM/ORM or facilities? The inspector may wish to sample notifications arrangements for informing non-compliance.

9 CIVILIAN GUARD FORCE**Inspectors should consider the following:**

- 9.1 Does the security plan define the roles and responsibilities of the civilian guard force to deliver all of the PPS outcomes and response effects? Is it supported by evidence such as comprehensive role specifications and operational instructions, site working instructions or similar? Are these documents current and relevant? The inspector may wish to sample these documents.
- 9.2 Do guard force numbers provide sufficient resilience to ensure that PPS outcomes and response effects can be delivered effectively at all times; including unplanned absence?
- 9.3 Is the guard force physically able to conduct all of the roles and responsibilities effectively? The inspectors may wish to check how the dutyholder demonstrates this capability.
- 9.4 Is there evidence of a robust and effective command and control function to manage the guard force? If the civilian guard force is outsourced, is there a dedicated strategic account manager, or equivalent, which the dutyholder holds to account for the delivery of agreed outcomes? The inspector may wish to review governance arrangements.
- 9.5 Where the guard force is outsourced, do the arrangements demonstrate that events, such as industrial action or other unforeseen events that could disrupt operational

OFFICIAL

OFFICIAL

- delivery, will not impact upon the delivery of the outcomes? The inspector may wish to check formal agreements that support this undertaking.
- 9.6 Is there evidence of sufficient continuous training and assessment to ensure a suitably qualified and experienced guard force that can deliver the defined outcomes effectively? Does this include activity to deliver situational awareness from the SSCR or equivalent? The inspector may wish to consider sampling training objectives, training records, attendance sheets, training material, exercise reports, OPEX.
- 9.7 Is there evidence that any outsourced guard force has valid Security Industry Authority (SIA) licenses and that the in-house guard force have an equivalent training package? The inspector may wish to check SIA records for the guard force and compare with the SIA licenses being carried.
- 9.8 Is there evidence of good practice being adopted in the appropriate control room? The inspector should consider referring to: Centre for the Protection of National Infrastructure – Human factors in CCTV control rooms – a best practice guide. Have human factors and ergonomic reviews been conducted?
- 9.9 Is there evidence of appropriate functional assurance which covers all aspects of operational effectiveness and the delivery of the defined outcomes? The inspector may wish to check internal assurance reports and where appropriate, the provision of metrics and KPIs to support assurance processes.
- 9.10 Does the dutyholder and guard force management team have regular meetings to ensure that the operational effect is being delivered consistently and re-evaluated to meet any change in threat or risks? The inspection should examine notes and records of these meetings.
- 9.11 Is there evidence that the guard force has received sufficient integrated exercising to confirm that defined outcomes can be delivered? The inspector may wish to consider sampling exercise objectives, training records, attendance sheets, exercise reports and outcomes.
- 9.12 Is there evidence that OPEX has been effectively captured and disseminated appropriately? Has OPEX been enacted upon where findings have identified a need to do so or if the OPEX directly affects operational capability? If appropriate, has the security plan or supporting documents been amended accordingly?
- 9.13 Is there evidence of notification arrangements, processes and procedures that ensure enhanced security measures can be implemented and sustained in an effective and timely manner? Are these arrangements tested on a regular basis? The inspector may wish to consider checking notification arrangements, call out arrangements and implementation plans.
- 9.14 Is there evidence that operational instructions, site working processes and procedures are effectively captured, maintained, reviewed and approved? The inspector may wish to check that the instructions are in date, have been reviewed and approved within specified timelines, and remain relevant.
- 9.15 Is the guard force correctly equipped for its role to deliver the PPS and Response outcomes? In particular, communications systems should be integrated or aligned in order to deliver an effective and timely response. The inspector may wish to verify that communications coverage has been checked and procedures have been implemented for any gaps.

OFFICIAL

OFFICIAL

- 9.16 Is there evidence that all aspects of SyDP's 5.1, 5.2 and 5.3 have been fully considered regardless of whether the guard force is in-house or outsourced? The inspector may wish to sample the EIMT regime and records.
- 9.17 Have dutyholders demonstrated how the civilian guard force has been fully embedded into the site health and safety and radiological protection regimes to meet their legal obligations and ensure safe and secure operations? The inspector may wish to sample records of briefings and training sessions.
- 9.18 Is there evidence of effective procedures to respond to non-compliance of search policies to prevent the theft of NM/ORM or SNI, and the sabotage of NM/ORM or facilities?

10 FURTHER READING

- 10.1 Security Assessment Principles
- 10.2 Nuclear Industries Security Regulations 2003. Statutory Instrument 2003 No. 403
- 10.3 IAEA Nuclear Security Series No. 13. Nuclear Security Recommendations on Physical Protection of Nuclear Material and Nuclear Facilities (INFCIRC/225/Revision 5). January 2011.
- 10.4 IAEA Nuclear Security Series No. 20. Objective and Essential Elements of a State's Nuclear Security Regime.
- 10.5 Convention on the Physical Protection of Nuclear Material (CPPNM)
- 10.6 HMG Security Policy Framework. Cabinet Office.
- 10.7 NISR 2003 Classification Policy.

OFFICIAL