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| ONR Technical Assessment Guide  Ongoing personnel security ‘aftercare’ |



ONR Technical Assessment Guide (TAG)

Ongoing personnel security ‘aftercare’

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Revision commentary

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| Issue | Description of update(s) |
| 1 | New document. |
| 1.1 | Minor update, including the following changes:   * Additional guidance added to sections 7, 8 and 9. * Alignment with updated HMG policies. * Removal of the ‘Workforce status changes notification – indicative form’ (previously Appendix 3) |

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# Introduction

1. The Office for Nuclear Regulation (ONR) has established a set of Security Assessment Principles (SyAPs) [1]. 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   
   (as amended) [2, 3, 4].
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.

# Purpose and scope

1. This TAG contains guidance to advise and inform ONR inspectors in the exercise of their regulatory judgement during assessment activities relating to 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.

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# Relationship to relevant UK legislation and policy

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.
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. Regulations 9, 17(3) and 22(7) (d) of NISR relate to workforce trustworthiness and have been included at [Appendix A](#_Appendix_A_–) 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 2018
* General Data Protection Regulation 2016/679
* Human Rights Act 1998
* Rehabilitation of Offenders Act 1974
* Rehabilitation of Offenders Act 1974 (Exceptions) Order 1975
* Rehabilitation of Offenders (Exclusions and Exceptions) (Scotland) Order 2003
* Rehabilitation of Offenders (Northern Ireland) Order 1978
* Equality Act 2010

# Relationship to international standards and guidance

1. The essential elements of a national nuclear security regime are set out in the Convention on the Physical Protection of Nuclear Material (CPPNM) [5] and the IAEA Nuclear Security Fundamentals [6]. Further guidance is available within IAEA Technical Guidance and Implementing Guides.
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.
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) [7]. Further detail at the operational level is contained in an Implementing Guide on Preventive and Protective Measures Against Insider Threats (NSS 8) [8], in particular Sections 3 and 5. An Implementing Guide on Nuclear Security Culture (NSS 7) [9] contains further information on establishing workforce trustworthiness (Section 4.3(i)).

# Relationship to national policy documents

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, associated guidance, and policy documentation.
2. The Government Functional Standard (GFS) on security [10] is supplemented by the Cabinet Office’s Personnel Security Policy (PSP) [11], and UK Government Baseline Personnel Security Standard policy and guidance document [12]. These documents are identified as relevant good practice. They describe 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 GFS 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.
3. Inspectors should note that, while SyAPs is outcome-focused and dutyholders are encouraged to determine their own security solutions, the Personnel Security Policy mandates minimum clearance levels for access to government information, other assets and certain nuclear materials. It also prescribes the constituent elements required for pre-employment screening and national security vetting (NSV). Consequently, there is no flexibility in the application of these aspects of workforce trustworthiness.
4. The NISR Classification Policy [13] indicates those categories of SNI that require a classification and the level of classification to be applied.

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# Advice to inspectors

## The benefits of ongoing personnel security

1. Throughout this TAG, the term ‘“staff’ includes both employees and contractors, as defined in detail in the TAG, “Pre-employment screening and NSV” [14], 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, including the submission of Aftercare Incident Reports (AIRs) as appropriate, to manage the insider risk effectively.
2. Furthermore, effective ongoing personnel security arrangements help ensure that both local and national security records are current and accurate. Consequently, 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.
3. The National Protective Security Authority (NPSA), within its Personnel and People Security guidance [15] advises that Personnel and People Security is comprised of an: “ integrated set of policies, procedures, interventions and effects which seek to enhance an organisation or site’s protective security by:

* Mitigating the risk of workers (insiders) exploiting their legitimate access to an organisation’s assets for unauthorised purposes;
* Optimising the use of the workforce (and, where appropriate, the public) to be a force multiplier in helping to prevent, detect and deter security threats, and;
* Detecting, deterring and disrupting external hostile actors during the reconnaissance phase.”

## Assessment of arrangements

1. 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.
2. 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 PSP [11];
* Dutyholder oversight and reporting arrangements on:
  + Matters which will affect a dutyholder’s local security records (including access controls) and the National Security Vetting Solution (NSVS) database;
  + Behaviours that 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

## Regulatory expectation

1. 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 , tracks issues to their conclusion, submits aftercare incident reports as appropriate, and drives workforce and line management engagement.

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| 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. | | |

# Ongoing personnel security culture

1. Dutyholders’ employment policies are subject to statutes (for example, the Equality Act 2010) that are not relevant statutory provisions of the Energy Act 2013 and therefore not subject to direct regulatory oversight by ONR. Ongoing personnel security culture is concerned with whether the workforce feels valued and how likely it is to demonstrate acceptable behaviours. Employers and contracting authorities that treat their workforce fairly; provide guidance on good security behaviour and address concerns appropriately by offering various support mechanisms; have security policies and practices that are accessible and transparent and provide security awareness training with updates to its workforce, will fare better in this respect. Thus inspectors will review dutyholders’ policies and practices including those publicised on the NPSA website [15] and its associated guidance, and the warning flags as identified in the Technical Inspection Guide (TIG) an organisational culture [16].
2. Inspectors should seek evidence that a dutyholder considers whether its own employment policies adequately support an ongoing personnel security culture. Examples of such policies are those relating to harassment and bullying, equal opportunities, employee assistance programmes, drug and alcohol testing, reporting hotlines, and exit procedures.   
   Dutyholders’ oversight of ongoing personnel security and practice should also include awareness of policies and practice in its supply chain including those publicised in the NPSA document “Supply Chain Security Collection.” [17].
3. Inspectors should consider:

* Whether the dutyholder’s employment practices are likely to encourage the workforce to feel valued, demonstrate acceptable behaviours and feel able to report unacceptable conduct;
* Whether the dutyholder has considered the impact of its employment policies and those of its supply chain, on their ongoing personnel security culture.
* Whether the dutyholder arrangements considers the TIG on organisational culture [16].

# Compliance with mandated reporting requirements

1. Holding an NSV clearance brings certain obligations for the individual. Such requirements are made clear to the individual during the NSV process. For example, each NSV clearance holder signs a declaration as part of the national security vetting process to the effect that they will notify any material changes in the information provided to the relevant personnel or security branch.
2. Upon receiving confirmation that a NSV clearance has been approved, the individual receives an electronic notification letter, with an attachment - “Maintaining Security Clearances – A guide for staff and contractors”. Holders of an NSV clearance are required to report relevant changes in their personal circumstances. As the submission of Change of Personal Circumstances (CPC) questionnaires is an online process undertaken by the vetted individual, the dutyholder is unlikely to be unaware of when CPCs are submitted. Dutyholders arrangements should ensure that their vetted community are reminded of their obligations as to when they are required to submit a CPC questionnaire.
3. As the vetting authority, ONR publishes a mandated Annual Security Appraisal Form (ASAF) for completion by DV holders (refer to [Appendix B](#_Appendix_B_–_1)). Dutyholders’ arrangements should ensure that this DV ASAF is used (though it may be tailored to meet dutyholders needs). When completed, it should be sent to ONR, annually, though alternatively, the dutyholder may submit a return to ONR advising both parts of the ASAF have been completed and there was nothing of note to report. The dutyholder’s arrangements should ensure that non-compliance by the subject is reported to ONR, through an Aftercare Incident Report (AIR). Where the line manager fails to complete Part 2 of the ASAF, it is for the dutyholder to determine any appropriate sanction against the line manager.
4. DV clearances issued by another Vetting Authority and being shared by a civil nuclear sector dutyholder, are not subject to the ASAF process by the dutyholder which has made the request to share the DV. The external Vetting Authority, (or where shared within the civil nuclear industry, the dutyholder) sponsoring the clearance, is responsible for managing the mandated ASAF process.
5. As the Vetting Authority, ONR requires Aftercare Incident Reports (AIRs) to be submitted on NSV clearance holders who test positive for alcohol and drug misuse, or falsify (or attempt to falsify) a test result. For such circumstances, the dutyholder’s arrangements should ensure ONR is notified through the submission of an AIR. That includes: reports of any positive tests for unlawful substances; reports of the misuse of prescription drugs; or any indicator that an individual, upon being requested to provide a sample, has sought to circumvent the process.
6. Testing programmes include tests undertaken “for cause”, on a random basis, or through an enhanced testing programme. The report is to include the date of the test, the substance(s) found (or how an individual has attempted to circumvent the process), the circumstances of the failed test, any proposed mitigation, and the individual’s current employment status.   
   For positive tests which relate to alcohol, unless the subject is already on a targeted testing programme, ONR need only be notified, through NSVS, once an individual has tested positive twice within a five-year period.
7. Inspectors should consider:

* Whether the dutyholder’s arrangements ensure that its vetted community is reminded as to when they are required to submit Change of Personnel Circumstances questionnaires.
* Whether the dutyholders arrangements ensure that relevant incidents reported to them, which are to be reported using the Change of Personnel Circumstances questionnaires are reported by the dutyholder as an Aftercare Incident Report to address how associated risks are being managed.
* Whether the dutyholder uses the DV ASAF process to forward the completed forms to ONR; and whether non-compliance is being reported to ONR using the Aftercare Information Report arrangements?
* Whether the dutyholder’s drug and alcohol testing arrangements explicitly include the reporting requirement to ONR via UKSV where tests are positive or where the individual has sought to circumvent arrangements.

# Other dutyholder oversight and reporting arrangements

1. **Clearance validity**. 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. It is however, possible to reinstate a clearance within twelve months of it lapsing, as long as a remaining period exists within the clearance lifetime.
2. 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. Any change to an individual’s access rights should be acted upon immediately.
3. National Security Vetting clearances are to lapse where either an individual requires only the BPSS, or where the NSV clearance no longer has a sponsor. This must be reported in real time and, where appropriate, identifying within the notification that a potential security concern may exist. The lapsing of NSV clearances is to be reported through the leaver reporting facility on NSVS.
4. Dutyholders are required to ensure they follow processes to help ensure ongoing accuracy of the NSVS and to report directly to UKSV using the appropriate NSVS template:

* Changes in an NSV holder’s employment type (i.e. staff becoming contractors or vice-versa); as a change in status can, for CTC and SC holders, affect the validity of the clearance period.
* Downgrading an NSV holder’s clearance to a lower level if the higher level is no longer required; (though where downgrading an NSV clearance to the BPSS, the individual is to be reflected as a leaver).
* If an individual returns and requires an NSV clearance, a request to reinstate the NSV holder’s clearance may be made within twelve months of it previously lapsing (otherwise it will expire and cannot then be reinstated).

1. Such information is also likely to be relevant to the dutyholder in order to maintain the integrity of local security records and access control systems.
2. Dutyholders are required to immediately inform ONR through the submission of an AIR, of the dismissal, suspension or exclusion of an individual.   
   The notification should clearly state the employment action taken/or being taken by the dutyholder. ONR will then consider whether the dismissal or exclusion may be due to behaviours that are incompatible with the Statement of HMG Personnel Security and National Security Vetting Policy and of any consequence that may have on the individuals national security vetting clearance.
3. Dutyholders are required to ensure that overseas travel arrangements for NSV holders comply with the PSP [11]. The PSP guidance provides advice on appropriate briefing arrangements.
4. Effective ongoing personnel security arrangements involve close cooperation between the Human Resources (including welfare), Occupational Health and Personnel Security departments[[1]](#footnote-2). Such cooperation will ensure that any information of potential security significance is passed to the Personnel Security Manager or other relevant person.
5. Where medical matters may have security significance, Occupational Health departments are to refer to the ‘Limitations’ section in the TAG, “Responsibility for Delivering Vetting and Personnel Security Arrangements” [18].
6. Certain matters that affect NSV clearance holders are likely to be of interest to ONR. Thus, a dutyholder’s arrangements should facilitate, where known, their reporting to ONR through the NSVS AIR or CPC portal.. Such matters include serious criminal offences, relevant illnesses, disciplinary sanction, financial difficulties and others. An illustrative, but not exhaustive list of examples of such matters is:

* **Criminal Offences**. Where a vetting applicant or National Security Vetting holder is arrested, refused bail, have received a police caution, reprimand or warning, or are convicted of an offence – (other than minor road traffic offences), the change of personal circumstances questionnaire ”Involvement With The Police” should be completed [19].
* **Illnesses**. Significant psychological disorders, or other medical conditions where symptoms may include an occasional loss of consciousness; physical weakness, or the potential to exercise poor judgement, indicating vulnerability in a post requiring a security clearance. The need to notify should consider 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 drug misuse; conflicts of interest; criminality.
* **Financial (SC and DV holders only unless indicative of fraudulent activity)** – The change of personal circumstances questionnaire “Finances” should be completed where there is a significant change in financial circumstances (bankruptcy, receiving a large inheritance, suffering substantial financial impact due to divorce or the dissolution of a civil partnership) [19].
* **General** – The change of personal circumstances “General” should be completed where there is a new partner[[2]](#footnote-3); a divorce, or dissolution of a civil partnership; a change of name; and for DV holders only, a change of co-resident (lodger, housemate, au pair, live-in domestic staff) [19].
* **Nationality** – The change of personal circumstances questionnaire “nationality” should be completed where there is the acquisition or revocation of a nationality [19].

1. Changes in circumstances known by the dutyholder should be subject to a proportionate risk assessment by the sponsor organisation with relevant persons being mindful that situations which can appear to be of a less serious potential stressor or vulnerability can potentially be of a security concern. For example, violating on-site traffic regulations may be a disciplinary matter, but it is possible it may also translate to a security concern if 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.
2. Dutyholders are required to consider whether behaviours or life events suggest incompatibility with the expected behaviours in the “Statement of HMG Personnel Security and National Security Vetting Policy.” If this is the case, their arrangements should ensure such concerns are reported to ONR through the submission of an AIR. This should include details of employment action taken/or being taken. Concerns in relation to BPSS holders will be managed by dutyholders as an employment issue unless the concerns constitute a potential threat to national or nuclear security.
3. The dutyholder’s arrangements should take account 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. Dutyholders should be able to demonstrate that such issues, together with the potential security implications, should be resolved at the earliest opportunity which may include the need to institute disciplinary action.
4. Though NSV clearance holders are made aware of their responsibilities for reporting any significant change in their personal circumstances, dutyholders are likely to become aware of some reportable changes through notifications to Human Resources. Internal processes should be in place to remind individuals to follow the mandated reporting process for any relevant change of personal circumstances through the CPC process.
5. Whilst the ASAF is mandated for DV holders, ONR cannot mandate its use for CTC and SC holders other than as a condition of granting a national security clearance where behaviours may need to be monitored . The ASAF form promotes an effective security culture and can assist dutyholders in addressing potential areas of concern. Where dutyholders decide to adopt a non-mandated SC and CTC ASAF, the completed returns should not be forwarded to ONR, unless security concerns are identified.
6. Concerns identified through the NSV process, or through ongoing personnel security arrangements, will not necessarily result in ONR deciding to deny or withdraw NSV. Where possible, concerns may be addressed through the application of caveats. 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 C](#_Appendix_D_–).
7. Anything of a security interest identified whilst using an NSV clearance on a share basis is to be raised through the AIR process. It will be for the Vetting Authority from whom the clearance has been shared to determine the ongoing suitability of that individual to hold a clearance and for the Vetting Authority of the organisation which has requested the share, to determine whether the share arrangement should be allowed to continue, though the sponsor may take its own employment action.
8. 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 - in the PSP [11].
9. Dutyholder arrangements should adequately cover remote and overseas working, i.e., those members of the workforce who work away from the organisation’s main site, including those publicised in the NPSA document “Remote and Overseas Working” [20].
10. Inspectors should consider:

* Whether there is a process to report information that affects the clearance record on the NSVS to ONR/UKSV.
* Whether 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 ONR/UKSV through the NSVS AIR facility, to establish the ongoing suitability of the individual to continue holding an NSV clearance.
* Whether the dutyholder promotes effective personnel security through using non-mandated ASAFs and by delivering personnel security themed campaigns/awareness sessions.
* Whether the dutyholder has established where personnel security responsibility sits within its supply chain organisations and how those organisations promote ongoing personnel security.
* Whether the dutyholders arrangements allow for aftercare incident reporting to be tracked to its conclusion?

# Appendix A – Excerpt from NISR 2003 concerning workforce trustworthiness

1. 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 –

* Is specified in the approved security plan for the premises as requiring investigation and assessment as mentioned in regulation 4(3)(a), or
* 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).

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

* Is specified in his approved transport security statement as requiring investigation and assessment as mentioned in regulation 16(3)(a), or
* 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).

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

* 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
* 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 B – Developed Vetting Annual Security Appraisal form

**Note: Form is to be marked as ‘OFFICIAL-SENSITIVE’ once completed.**

|  |  |
| --- | --- |
| Technical Directorate (Personnel Security),  Office for Nuclear Regulation  Redgrave Court,  Merton Road,  Bootle,  Merseyside, L20 7HS | **FOR OFFICIAL USE ONLY**  **ONR (TD- Personnel Security)): via Personnel Security Manager for: …………………**  **Telephone Number: ……. Date Issued: …../……/…….** |

**SUBJECT’S DEVELOPED VETTING ANNUAL SECURITY APPRAISAL FORM**

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| --- |
| **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: …/……/…… |

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.**

**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** | | |

1. **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 below the question set. You are reminded that there are mandatory reporting processes where you have a change of partner or change to your name; change of co-residents; a significant change in financial circumstances, are arrested, charged or convicted of an offence, 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 & who has not previously been declared (includes marriage & civil partnership)? |  |  |
| 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)? |  |  |
| c) Have you travelled to countries outside of the UK, EEA, EU, or NATO on either business or pleasure? (A list of these countries will be held by your Personnel Security Manager) |  |  |
| d) Have you experienced/are you experiencing any serious personal difficulties (e.g. ill health, legal troubles, domestic/marital problems) |  |  |
| e) Has the amount of alcohol you regularly consume increased? |  |  |
| f) 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? |  |  |
| h) Have you taken illegal drugs or had any issue with prescription medication? |  |  |
| i) Have you sought medical advice or received treatment for alcohol or drug use/addiction? |  |  |
| j) Have you associated with any political or religious group that have views which conflict with your employers values, goals or policies (includes conversations or contact either in person, phone, through social media or any other route)? |  |  |
| k) Do you or any of your close family or friends have associations (including overseas connections) with individuals, organisations that could cause concern 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 e.g. through social media or personal profiles details about your role and/or security clearance that 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 (e.g. 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? |  |  |

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** |
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| 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. 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, as the Vetting Authority, or UKSV as the Vetting Authority’s service provider against credit and criminal records routinely checked as part of the vetting process.  **Signature: ……………………………… Date: …../…../…..**  **Telephone No.: ………………….. E Mail address: …………………………..** | |

**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 as the Vetting Authority for the Civil Nuclear Industry. In this instance, you may forward this PART ONE directly to ONR (whose address is at 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 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, it 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] 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 or limited pending receipt of the completed form.

**Security Appraisal Form**

**Part One**

**complete**

**Notification to Personnel Security Manager of submission of PART ONE of DV SAF directly to ONR.**

**To**: Personnel Security Manager

[Site Address]

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

**Signature:**

**Name (Block capitals):**

**Staff number:**

**Telephone number:**

**Date:**

**Security Appraisal Form**

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

**complete**

|  |
| --- |
| Personnel Security,  Office for Nuclear Regulation , Technical Division (Personnel Security),  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 that 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:

**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?

b) Would you have reservations about supervising the subject again?

c)Does the subject demonstrate a low level of motivation and feel that

their contribution is undervalued?

d) Does the subject show conflict with management/colleagues?

e) Is the subject a loner?

f) Is the subject unable to take constructive criticism?

g) Does the subject lack reliability, stability & discretion?

h) Is the subject unable to cope with pressure?

i) Does the subject show a poor attitude to security?

j) Has the subject committed any security breaches?

k) Have you noticed any change in the subject behaviour or approach

to work?

**Has the subject shown any evidence of:**

l) Associations or contact with subversive organisation of

British or foreign origin?

m) Misuse of drugs?

n) Misuse of alcohol?

o) Unreliability/dishonesty/untrustworthiness/indiscretion?

p) Significant financial difficulties or inexplicable affluence?

q) Conduct liable to lead to vulnerability or blackmail

(e.g. sexual or other)?

1. Illness, including mental illness, or use of prescribed drugs which

might adversely affect judgement?

1. Are you aware of any other grounds that might cast doubt

on the subject’s suitability for continued DV clearance?

t) Is there any matter that you would like to discuss personally with

the vetting authority?

u) Is input from another supervisor/ manager needed to give a full and

accurate picture of the subject?

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

|  |  |
| --- | --- |
| **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 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 as the Security Regulator and Vetting Authority for the Civil Nuclear Industry in which instance you may forward this PART TWO directly to ONR 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 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.

**Security Appraisal Form**

**Part Two**

**complete**

**Notification to Personnel Security Manager of submission of PART TWO of DV SAF directly to ONR.**

**To:** Personnel Security Manager

**[Site Address]**

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

**Name**:

**Staff number**:

directly to ONR.

**Own signature:**

**Own name (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**

**complete**

# Appendix C – Explanation of caveats

1. When granting clearances at NSV level, ONR will sometimes apply caveats. The responsibility for maintaining caveats rests with the sponsor of the clearance. Dutyholders may apply their own caveats relating to conditions of employment. The implications of ONR applied caveats are given below:
   1. **Subject to Security Appraisal Form (SAF) Cover** - All DV holders are subject to mandated annual SAF (ASAF) cover. Where concerns arise, ONR can mandate the ASAF process for CTC and SC holders. Sometimes a caveat may be applied on a more frequent basis, for example, “Subject to six-monthly SAF cover”. This caveat is usually applied where ONR has ongoing personnel security concerns and it is usually time limited.
   2. **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. Where there is a subsequent change in citizenship, the appropriate CPC questionnaire is to be completed.
   3. **No isolationist/singleton postings** - 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 with the supervisor having a “watching brief”. Advice from the dutyholders Occupational Health Department should be sought in each instance where this caveat has been applied.
   4. **Not transferable between posts or sites without reference to ONR** (or variances of this) - Usually applied where an individual has a conscientious objection working in some posts or where a further assessment is required before an individual can move into other sensitive posts.
   5. **Subject to an Enhanced Targeted Drug and/or Alcohol Testing Programme** - Applied where ONR has knowledge of a recent history associated with unlawful substances, misuse of prescription medication, and/or a misuse of alcohol. Determining the periodicity and frequency of testing is the responsibility of the dutyholder. Advice from the dutyholders Occupational Health Department should be sought where this caveat has been applied. When the sponsor determines that the caveat can be lifted, this is to be formally reported by means of an AIR through NSVS.
   6. **Subject to providing a Basic Disclosure every # months for # years** - Applied where ONR has concerns about an individual’s criminal history record. It will usually be time limited.
   7. **Subject to financial review by the sponsor and ONR** - Applied where ONR has concerns in relation to the subjects finances and has required a disclosure by the subject to the sponsor of the clearance so that the sponsor alongside ONR can review the subjects financial conduct on an ongoing basis, including signposting to avenues of support. Financial reviews carried out by the sponsor, including those indicating an improvement in circumstances, should be reported through an AIR.
   8. **Subject to information security briefing owing to overseas associations** - Applied where there are associations with overseas nation states that may have an interest in the UK activities. The responsibility for delivering the security briefing rests with the sponsor which should submit an AIR if information of security interest comes to light during the briefing or thereafter.

# Glossary and abbreviations

AIR Aftercare Incident Report

ASAF Annual Security Appraisal Form

BPSS Baseline Personnel Security Standard

CPC Change of Personnel Circumstances

CPPM Convention of the Physical Protection of Nuclear Material

CTC Counter Terrorist Check

DV Developed Vetting

EEA European Economic Area

EU European Union

HMG His Majesty’s Government

HR Human Resources

IAEA International Atomic Energy Agency

NCSC National Cyber Security Centre

NISR Nuclear Industries Security Regulations

NM Nuclear Material

NPSA National Protective Security Authority

NSSP Nuclear Site Security Plan

NSV National Security Vetting

NSVS National Security Vetting Solution

OH Occupational Health

ONR Office for Nuclear Regulation

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

TIG Technical Inspection Guide

TSS Transport Security Statement

UK United Kingdom

UKSV United Kingdom Security Vetting

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|  |  |
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1. This three-way relationship is known as ‘The Golden Triangle’. [↑](#footnote-ref-2)
2. The definition of a partner, for security vetting purposes, is either: your spouse, a cohabiting partner, someone with whom you are in an enduring sexual and/or romantic relationship, or someone with whom you see a committed or enduring future. [↑](#footnote-ref-3)