



OFFICIAL

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 1		
Date Issued:	November 2019	Review Date:	November 2024
Approved by:	Matt Sims	Professional Lead	
Record Reference:	CM9 Folder 4.4.2.23373. 2019/135722		
Revision commentary:	Review 1		

TABLE OF CONTENTS

1. INTRODUCTION 2

2. PURPOSE AND SCOPE 2

3. RELATIONSHIP TO RELEVANT LEGISLATION 2

4. RELATIONSHIP TO IAEA DOCUMENTATION AND GUIDANCE 3

5. RELATIONSHIP TO NATIONAL POLICY DOCUMENTS 3

6. ADVICE TO INSPECTORS 4

7. ONGOING PERSONNEL SECURITY CULTURE 5

8. COMPLIANCE WITH MANDATED REPORTING REQUIREMENTS 6

9. OTHER DUTYHOLDER OVERSIGHT AND REPORTING ARRANGEMENTS 7

10. REFERENCES 10

12. GLOSSARY AND ABBREVIATIONS 12

APPENDIX 1 – EXCERPT FROM NISR 2003 CONCERNING WORKFORCE TRUSTWORTHINESS 13

APPENDIX 2 – DEVELOPED VETTING ANNUAL SECURITY APPRAISAL FORM 14

APPENDIX 3 – WORKFORCE STATUS CHANGES (CASUALTY RETURN) NOTIFICATION – INDICATIVE FORM 26

APPENDIX 4 – EXPLANATION OF CAVEATS 27

OFFICIAL**1. INTRODUCTION**

- 1.1 The Office for Nuclear Regulation (ONR) has established a set of Security Assessment Principles (SyAPs) (Reference 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 (References 2 - 4).
- 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 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.

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 2018
 - General Data Protection Regulation 2016/679
 - Human Rights Act 1998
 - Rehabilitation of Offenders Act 1974

OFFICIAL

OFFICIAL

- 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
- 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 5) and the IAEA Nuclear Security Fundamentals (Reference 6). 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 7). Further detail at the operational level is contained in an Implementing Guide on Preventive and Protective measures against insider threats (NSS 8) (Reference 8), in particular Sections 3 and 5. An Implementing Guide on Nuclear Security Culture (NSS7) (Reference 9) 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, associated guidance, and policy documentation.
- 5.2 The HMG Security Policy Framework (SPF) (Reference 10) is supplemented by the "Cabinet Office SPF Personnel Security Supplement (Reference 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" (Reference 12). Both of 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 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.

OFFICIAL

OFFICIAL

- 5.3 Inspectors should note that whilst SyAPs is outcome focused and dutyholders are encouraged to determine their own security solutions, the SPF Personnel Security Supplement 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. Consequently, there is no flexibility in the application of these aspects of workforce trustworthiness.
- 5.4 The Classification Policy (Reference 13) indicates those categories of SNI that require a classification and the level of classification to be applied.

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. 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.
- 6.3 CPNI, within its “Ongoing Personnel Security – A Good Practice Guide” (Reference 14), 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 11)

OFFICIAL

OFFICIAL

- 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 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 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 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 that treat their employees fairly; provide guidance on good security behaviour and address concerns appropriately, perhaps 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 in the CPNI document "Ongoing Personnel Security - A Good Practice Guide" (Reference 14).
- 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 (Reference 15).

Inspectors should consider:

- Are the dutyholder's employment practices likely to encourage the workforce to feel valued, demonstrate acceptable behaviours and feel able to report unacceptable conduct? 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 too?

OFFICIAL

OFFICIAL**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 16 and 17).
- 8.2 Upon receiving confirmation of an NSV clearance being approved, the individual receives a document “Maintaining Security Clearances – A guide for staff and contractors” (Reference 18) which is attached to the ONR NSV clearance letter – References 6-8. These place further requirements on the NSV clearance holder. ONR relies on dutyholders forwarding reports made by the NSV holder, if the individual does not report them directly to United Kingdom Security Vetting (UKSV).
- 8.3 As the vetting authority, ONR publishes (Appendix 2) a mandated Annual Security Appraisal Form (ASAF) for DV holders. Dutyholders’ arrangements should ensure that this specific DV ASAF is used and, when complete, send it to ONR annually. The dutyholder’s arrangements should ensure that non-compliance by the subject is reported to ONR through an Aftercare Incident Report (AIR) on NSVS or alternatively by letter or e-mail to UKSV. 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.
- 8.4 DV clearances issued by another Vetting Authority and being shared by a dutyholder are not subject to the ASAF process by the dutyholder that has sought to share the DV. The external Vetting Authority sponsoring the clearance manages the mandated ASAF process.
- 8.5 As the Vetting Authority, ONR requires 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 is notified through an AIR submitted through NSVS, (or alternatively a letter/e-mail to UKSV) of all NSV holders’ positive tests for unlawful substances or misuse of prescription drugs or any indicator that an individual, upon being requested to provide a sample, has sought to circumvent the process. 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, the substance(s) found, (or how an individual has attempted to circumvent the process) and the individual’s current employment status. For 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.
- 8.6 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 ONR through the NSVS portal, or by letter or e-mail to UKSV?
- Does the dutyholder use the DV ASAF process and forward the reports to ONR. Is non-compliance being reported to ONR through the NSVS portal or by letter or e-mail to UKSV?
- Do the dutyholder’s arrangements explicitly include the reporting requirement for NSV holders relating to drug and alcohol tests with a consent process that clearly details the reporting protocols to its workforce?

OFFICIAL

OFFICIAL

9. OTHER DUTYHOLDER OVERSIGHT AND REPORTING ARRANGEMENTS

- 9.1 **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, although it is possible to reinstate a clearance within a 12-month window of it lapsing, so long as a remaining period exists within the clearance lifetime. 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, e.g. through its exit procedures. Any change to an individual's access rights should be acted upon immediately. Lapsed clearances, e.g. where a clearance no longer has a regulated sponsor organisation, must be reported through the leaver reporting facility on NSVS.
- 9.2 Dutyholders are mandated to ensure the ongoing accuracy of the NSVS and to ensure, where known, the reporting of the following for NSV holders through the Casualty Return process for which an indicative template is provided at Appendix 3:
- changes in employment type (i.e. staff becoming contractors or vice-versa), as this change in status can affect the validity of the clearance period
 - downgrading a clearance to a lower level if the higher level is no longer required
 - requests to reinstate a clearance.
- 9.3 Such information is likely to be relevant to the dutyholder for their local security records and access control systems.
- 9.4 Dutyholders are required to immediately inform ONR through the submission of an AIR through NSVS, or alternatively through a letter or e-mail to UKSV, 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.
- 9.5 Dutyholders are required to ensure that overseas travel arrangements for SC and DV holders comply with the Cabinet Office Personnel Security Supplement to the Security Policy Framework. The SPF guidance provides advice on appropriate briefing arrangements.
- 9.6 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 ONR, the doctor or medical staff will need to balance the need to disclose personal data with the privacy of the individual.
- 9.7 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 portal or alternatively by letter/e-mail to UKSV. 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

OFFICIAL

OFFICIAL

DV, SC or CTC security clearance and the individual is arrested, refused bail, receives a police caution, reprimand or final warning or is convicted of an offence (other than minor road traffic offences). (Reference 19)

- **Illnesses.** Significant psychological disorders or other medical conditions (e.g., diabetes, epilepsy, sleep apnoea) 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 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. (Reference 20)
- **General –** change of partner (where living as a couple); change of co-residents (DV only); change of name; change of nationality. (References 21 & 22)

- 9.8 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; 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 National Security Vetting Policy." If this is the case, their arrangements should ensure such concerns are reported to ONR using the NSVS AIR portal or alternatively by letter/e-mail to UKSV, and should include details of employment action taken/or being taken. Concerns in relation to BPSS holders will generally be managed by dutyholders as an employment issue unless the concerns constitute a potential threat to national security.
- 9.9 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.
- 9.10 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.
- 9.11 ONR cannot mandate the use of an ASAF for CTC and SC holders by dutyholders. However, inspectors should look favourably on dutyholders who adapt the DV ASAF to

OFFICIAL

OFFICIAL

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 dutyholders 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.

- 9.12 Concerns identified through the NSV process, or through ongoing personnel security arrangements, will not necessarily result in ONR 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, ONR 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 4.
- 9.13 Anything of a security interest identified whilst using an NSV clearance on a share basis is to be raised through the AIR process (or alternatively a letter or e-mail to UKSV) for the external Vetting Authority to determine the ongoing suitability of that individual to hold a clearance.
- 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.(Reference 23)
- 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 that affects the integrity of the clearance record on the NSVS to ONR?
- 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 ONR through the NSVS AIR facility (or by letter or e-mail to UKSV), to establish the ongoing suitability of the individual to continue holding an 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?

OFFICIAL

OFFICIAL**10. REFERENCES**

1. **Security Assessment Principles** – CM9 Ref 2017/121036
2. **Nuclear Industries Security Regulations 2003**. Statutory Instrument 2003 No. 403
3. **Nuclear Industries Security (Amendment) Regulations 2006**. Statutory Instrument 2006 No. 2815
4. **Nuclear Industries Security (Amendment) Regulations 2013**. Statutory Instrument 2013 No. 190
5. **Convention on the Physical Protection of Nuclear Material (CPPNM)**
<https://www.iaea.org/publications/documents/conventions/convention-physical-protection-nuclear-material>
6. **Nuclear Security Series 20 - IAEA Nuclear Security Fundamentals** http://www-pub.iaea.org/MTCD/Publications/PDF/Pub1590_web.pdf
7. **INFCIRC/225 IAEA – The Physical Protection of Nuclear Material**
<https://www.iaea.org/publications/documents/infircs/physical-protection-nuclear-material>
8. **IAEA Nuclear Security Series No 8 – Preventive and Protective Measures against Insider Threats** http://www-pub.iaea.org/MTCD/publications/PDF/pub1359_web.pdf
9. **IAEA Nuclear Security Series No 7 – Nuclear Security Culture** http://www-pub.iaea.org/MTCD/publications/PDF/Pub1347_web.pdf
10. **HMG Security Policy Framework**.
11. **Cabinet Office SPF Personnel Security Supplement (OFFICIAL – SENSITIVE)**
12. **HMG Baseline Personnel Security Standard – Guidance on the pre-employment screening of civil servants, members of the armed forces, temporary staff and government contractors**
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/677553/HMG_Baseline_Personnel_Security_Standard.pdf
13. **NISR 2003 Classification Policy** – www.onr.org.uk/documents/classification-policy.pdf
14. **Centre for the Protection of National Infrastructure – Ongoing Personnel Security**
<https://www.cpni.gov.uk/personnel-and-people-security>
15. **Centre for the Protection of National Infrastructure and National Cyber Security Centre – Supply Chain Security Collection**
https://www.cpni.gov.uk/system/files/documents/2e/87/Supply_Chain_Security_Collection_Jan2018.pdf
16. **Counter Terrorist Check / Security Check Questionnaire**
<https://www.gov.uk/government/publications/security-check-counter-terrorist-check-questionnaire-nsv001>

OFFICIAL

OFFICIAL

17. **Developed Vetting Questionnaire**
<https://www.gov.uk/government/publications/developed-vetting-questionnaire-nsv002>
18. **HMG Maintaining Security Clearances - A guide for staff and contractors**
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/418619/2015_0327- Maintaining Security Clearances - Staff guidance FINAL.pdf
19. **Change of Personal Circumstances Questionnaire (Convictions/Arrests/Cautions)**
<https://www.gov.uk/government/publications/change-of-personal-circumstances-questionnaire-criminal-convictionarrestcaution>
20. **Change of Personal Circumstances Questionnaire (Finances)**
<https://www.gov.uk/government/publications/change-of-personal-circumstances-questionnaire-financial-issues>
21. **Change of Personal Circumstances Questionnaire (Domestic Arrangements)**
<https://www.gov.uk/government/publications/change-of-personal-circumstances>
22. **Change of Personal Circumstances Questionnaire (Nationality)**
<https://www.gov.uk/government/publications/change-of-personal-circumstances-questionnaire-change-of-nationality>
23. **HMG Maintaining Security Clearances – A guide for line managers or supervisors of staff**
https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/418622/2015_0327- Maintaining Security Clearances - Managers guidance FINAL.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.

OFFICIAL

11. GLOSSARY AND ABBREVIATIONS

AIR	Aftercare Incident Report
ASAF	Annual Security Appraisal Form
BPSS	Baseline Personnel Security Standard
CNSS	Civil Nuclear Security and Safeguards
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
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
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
TSS	Transport Security Statement
UK	United Kingdom
UKSV	United Kingdom Security Vetting

OFFICIAL

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 approved 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.

OFFICIAL

OFFICIAL – Contains personal data when completed

APPENDIX 2 – DEVELOPED VETTING ANNUAL SECURITY APPRAISAL FORM

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

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

SUBJECT’S DEVELOPED VETTING ANNUAL 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.

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		

OFFICIAL – Contains personal data when completed

OFFICIAL – Contains personal data when completed**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 & who has not previously been declared (includes marriage & 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 on either 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 (e.g. 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) 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 conversations or contact either in person, 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 or be used to place pressure upon you as an individual?	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>
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?	<input type="checkbox"/>	<input type="checkbox"/>
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)?	<input type="checkbox"/>	<input type="checkbox"/>
o) Do you have any reservations, moral or otherwise, about any aspect of your work or the wider activities of your employer/government organisation?	<input type="checkbox"/>	<input type="checkbox"/>
p) Have you been the subject of any disciplinary action, complaint or grievance in this period?	<input type="checkbox"/>	<input type="checkbox"/>
q) Have you committed any security breaches in this period?	<input type="checkbox"/>	<input type="checkbox"/>

OFFICIAL – Contains personal data when completed

OFFICIAL – Contains personal data when completed**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

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 Number: **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.

OFFICIAL – Contains personal data when completed

OFFICIAL

SECURITY APPRAISAL FORM

Part One

complete

OFFICIAL

OFFICIAL

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 (In Block Capitals) -

Staff Number -

Telephone Number -

Date -

OFFICIAL

OFFICIAL

SECURITY APPRAISAL FORM

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

complete

OFFICIAL

OFFICIAL – Contains Personal Data when completed

Personnel Security,
Office for Nuclear Regulation (Civil Nuclear Security & Safeguards),
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 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:

OFFICIAL – Contains Personal Data when completed

OFFICIAL – Contains Personal Data when completed

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 that 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"/>

OFFICIAL – Contains Personal Data when completed

OFFICIAL – Contains Personal Data when completed

3. 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 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.

OFFICIAL – Contains Personal Data when completed

OFFICIAL

SECURITY APPRAISAL FORM

Part Two

complete

OFFICIAL

OFFICIAL

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 (In Block Capitals) -

Own Staff Number -

Own Telephone Number -

Date -

OFFICIAL

OFFICIAL

SECURITY APPRAISAL FORM

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

complete

OFFICIAL

APPENDIX 4 – EXPLANATION OF CAVEATS

When granting clearances at NSV level, ONR will sometimes apply caveats. The responsibility for maintaining caveats rests with the dutyholder. 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 - applied caveats are given below:

Subject to 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 e.g. “Subject to six-monthly SAF cover”. This caveat is usually applied where ONR has ongoing personnel security concerns and will usually be time-limited.

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 change in citizenship, the appropriate CPC questionnaire is to be completed.

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.

This clearance is not transferable between posts or sites without reference to ONR (CNSS) (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 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 identifies the caveat can be lifted, this is to be formally reported by means of an AIR through NSVS.

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.

Subject to financial review

Applied where ONR has concerns in relations to the way the subject operates their finances.