

# **Security Notice**

SN2015-04

**Government Security Secretariat** 

### **Maintaining Security Clearances**

Issued to DSOs, Security Teams and relevant Industry Security Controllers on 27 March 2015 for action.

#### SPF Related Guidance

#### Issue:

1. The initial component checks that comprise National Security Vetting clearances can only provide a snapshot at the time they are done. It is essential therefore that clearances are actively maintained via effective on-going personnel management processes, which at the Developed Vetting level will include an annual security appraisal. For these arrangements to work security units need to ensure that vetted staff and line managers are fully aware of their responsibilities. This notice provides a clear step by step guide on responsibilities and requirements to maintain security clearance.

#### Action:

2. Security Units and Security Controllers must ensure that these ongoing personnel security management requirements are built into their personnel security processes (including for contractors) by June 2015. This includes ensuring that line managers or supervisors of staff who have undergone Developed Vetting (DV) or who are supervising contractors who have DV clearance are aware of their responsibilities with regard to regularly engaging staff on security issues and the requirement to complete the Annual Security Appraisal Process.

#### Support:

3. Cabinet Office will be offering a number of opportunities to engage with us directly to further understand and support this new approach as we go forward.

#### Background:

4. The Cabinet Office Official Committee on Security (SO) has, as part of Government's wider policy approach to modernising vetting, set direction that security clearances need to be better explained and understood by staff and contractors across government.

- 5. Managing security clearances requires active conversations between individuals and managers throughout the year and prompt reporting of any issues of concern as they arise. The Annual Security Appraisal Form (ASAF) attached here should be completed by all individuals who hold Developed Vetting (DV) clearance to provide assurance that they are being supported and monitored as is appropriate for individuals with access to sensitive assets.
- 6. It is intended that the issue and completion of ASAFs will be automated through the new National Security Vetting System introduced in 2016. Until then departments and industry partners are encouraged to put in place effective processes locally to continue delivering the ASAF process and to highlight and action areas of concern arising from this process.
- 7. If departments/organisations wish to extend this process to other vetting levels (e.g. all SC), to supplement with additional questions on a separate form or mandate an interview as part of the review they may do so at their discretion however, these additions will only apply and be retained locally. The ASAF provided must however, always be used as part of this process.

#### **Basic Principles:**

- 8. This note applies to all vetted staff, be they civil servants, crown or public servants or contractors. The Basic Principles to take into account are
  - On appointment, all staff and contractors in a vetted role should be briefed by their line manager/ supervisor on the security requirements specific to their role and the risks that national security vetting and other local security controls are intended to mitigate. Line managers should be satisfied that vetted staff understand their security responsibilities and the consequences of not meeting them. All DV staff and their managers will going forward receive a standard letter outlining their responsibilities when they are vetted which should be issued as provided to all relevant individuals. Individuals should also receive a security induction from their line manager (or security unit/ security controller), the completion of which should be recorded as per local procedures.
  - Vetting subjects (DV, SC & CTC) must report any relevant change in their circumstances that could have a bearing upon their clearance. Relevant changes are explained in the ASAF and will be captured on an improved Change of Personnel Circumstances form on the future NSV System.
  - As a minimum, to maintain the clearance, an annual security clearance review must be completed by DV staff (and staff with additional or Enhanced Security Clearance (eSC) and their line managers. This includes all DV or eSC contractors and their Line managers/supervisors.

- If this annual review process has not been completed by DV (or eSC) staff, this will bring into question the individual's suitability to retain security clearance. Departments and industry partners will have discretion to suspend or lapse an individual's clearance as appropriate (industry partners should work with the relevant Government department to agree the best approach and ensure relevant information on individual cases is shared). In all instances where no action has been taken to complete an ASAF following reasonable reminders departments will be expected to take action, including to suspend or lapse an individual's clearance where appropriate.
- Line managers/supervisors should monitor behaviour that could potentially impact on the security of the organisation, (e.g. signs of inappropriate behaviour or negligent practices contrary to security arrangements). This is an ongoing responsibility that is part of good line management and not just a requirement in relation to completion of the ASAF process.
- Whilst there is no fixed requirement to complete an annual security clearance review for SC, CTC & BPSS staff, local guidance may expand to include these groups as appropriate. Any security concerns in respect of staff generally should be reported to the local security unit who will record it and take follow up actions where appropriate.
- Line managers/supervisors are not Vetting Officers but should be expected to exercise both a duty of care for staff and be mindful of potential security risks to the organisation. The 'Maintaining Security Clearances - Guidance for Staff and Contractors' and 'Maintaining Security Clearances - Guidance for Line Managers/Supervisors' leaflets found on Gov.uk provide common sense guidance to support this process.
- Whilst vetting confidentiality must be maintained, organisations must ensure any relevant information is shared appropriately between vetting units, HR and line managers to help manage staff and staff performance in a joined up and holistic way.
- The ASAF requires the line manager to make an assessment of an individual's continuing suitability to hold DV. Where there are issues of concern the line manager may be interviewed (or ask to be interviewed) by the security unit/security controller to further explain concerning or complex areas.

#### **Process for DV:**

9. A new ASAF is attached to this note. This should be completed on an annual basis. The individual is responsible for completing Part 1 of the form (when the form is issued it should indicate on the top where the form is to be returned to) and for ensuring their line manager/supervisor completes Part 2.

- 10. **Individuals** should think about their security clearance as a credential they must maintain whilst there are formal review periods, clearances may be reviewed, suspended, lapsed or be withdrawn at any stage if the organisation no longer has the necessary confidence or assurance in the individual. This is especially so in respect of DV clearances, which give individuals access to the most sensitive assets. Individuals should be aware that they must exercise discretion, good judgment and apply the necessary security controls as an ongoing requirement.
  - Each individual is responsible for reporting Change of Personal Circumstances to their local security unit or directly to the vetting provider in a timely manner. The type of changes that should be reported will include forming or ending a marriage/partnership; financial difficulties, issues with drugs or alcohol; criminal caution or conviction. If in doubt individuals should speak to their Line manager/supervisor or directly to the local security team.
- 11. Line managers/supervisors are expected to exercise a duty of care for their staff and to be mindful of the potential security risks associated with issues such as personal relationships, health, debt, bereavement or extremist views and also to meet their obligations to the organisation in mitigating risks against assets (including information) arising from bad security behaviours.
  - Line Managers/supervisors must complete the annual security clearance review for DV staff and contractors.
  - The clearance level for each post should also be reviewed regularly to ensure that it is appropriate. Where security vetting requirements change, the appropriate notification must be passed to security and HR areas.
- 12. All ASAFs will be looked at and may prompt a request to discuss issues with the local security unit. Any concerns about completing the form should be addressed to local security units. If there are no areas of concern then no further action once the form is completed need be taken
- 13. **Departments/Organisations** are reminded that ongoing personnel security management is not simply about completing an annual form but having a regular conversation with staff. Issues should not be saved up to be reported later but addressed as they arise. This is part of the wider good security culture of an area.
- 14. Organisations may choose to add additional questions using a local form or interview if there is a specific requirement to do so (e.g. mandatory drug testing in some areas) However, the standard ASAF form should always be used. The questions on the ASAF are related to the level of security risk an individual's actions and public profile may have in relation to their role, allowing line managers and the wider organisation to consider risk in an appropriate manner.

- 15. Where DV staff are directly employed in international organisations (e.g. NATO) individuals should speak to their local security unit to understand how this applies to them.
- 16. If this annual process is not completed for individuals with DV after a suitable reminder period their clearance may be suspended or deemed to have lapsed.

#### **Process for Enhanced SC:**

17. Individuals who hold Enhanced SC clearance and their line managers/supervisors should follow the process for DV staff as set out above.

#### Process for Counter Terrorist Checks (CTC) and SC:

- 18. **Individuals** retain a responsibility to meet the security practices of their area at all levels of clearance. They should:
  - Ensure that their contact details are up to date on HR systems and that they notify their local security unit, vetting provider or security controller of any change in role or contact details.
  - Exercise discretion, good judgment and apply the necessary security controls as an ongoing requirement. These behaviours and standards are summarised in the 'Maintaining Security Clearances - Guidance for Staff and Contractors' and 'Maintaining Security Clearances - Guidance for Line Managers/Supervisors' leaflets found on Gov.uk provide common sense guidance to support this process.
  - Discuss concerns about events or changes in their lives that have led (or could lead) to someone exerting pressure to extract information, allow unauthorised parties access to assets etc. with line managers or local security areas at the earliest opportunity.
  - Take action where other members of staff are acting oddly or in a way that is against their local security guidelines. Individuals have a personal responsibility to inform line managers and/or to take appropriate action themselves to address.
- 19. Line managers/supervisors are expected to exercise a duty of care for all staff and to be mindful of the potential security risks associated with issues such as personal relationships, health, debt or bereavement at all levels of security clearance
  - Take responsibility to ensure your team regularly reviews whether appropriate security is being maintained across the area.

- Raise concerns and ensure security is being discussed at appropriate boards.
- Raise issues of concern through to senior management and local security officers as appropriate.
- 20. Where line managers/supervisors have concerns about any individual they should first speak with the member of staff/contractor in a timely manner and then highlight any residual concerns to local security teams and arrange for them to be recorded on the individual's vetting or personnel file as set out in local policy.

#### **Process for BPSS**

- 21. While BPSS checks are not part of vetting all staff at all levels retain a responsibility to follow the security guidance and processes for their area and to be aware of their personnel responsibilities.
- 22. As BPSS is a one off pre-employment process it can not be withdrawn. However, if an individual is found to be acting in a way or associated with groups that could cause concern the department/organisation may choose to take actions to restrict or monitor that individual more closely.

#### General Advice to Line Managers/supervisors:

- Do make sure the individual you are assessing understands the necessity of the questions on the form or being raised in discussion;
- Do ask difficult questions where there is cause to do so; if an individual refuses to discuss an area of concern with you, this should be recorded;
- Do offer the individual access to welfare/HR/Occupational Health if appropriate and as available in your department/organisation;
- Do challenge negative or disruptive behaviours as this is part of good performance management as well as security management; and,
- Do offer support and work collaboratively with security and HR to address issues at the earliest point.
- Do not make a recommendation on the basis of moral or ethical judgments (explicit or implied) about anything you are told remember the context is how trustworthy the person is in their professional role;
- Do not pursue a point for curiosity or to illicit unnecessary information; discussion should focus on the behaviour and performance of the individual and how it affects their suitability to continue to hold clearance;
- Do not make assumptions Gather evidence.
- Do not modify your assessment because an individual or other party is unhappythe ASAF is about the evidence and your assessment of it.,

#### **Contact:**

23. Please contact Amy Taylor Saunders, Government Security Secretariat <u>amy.taylorsaunders@cabinet-office.x.gsi.gov.uk</u> or <u>GSSmailbox@cabinet-office.x.gsi.gov.uk</u> with any enquiries relating to this Security Notice.

#### CO GSS

March 2015

#### Frequently Asked Questions

#### Is this just another bureaucratic process?

No. It has always been policy that ASAFs should be being completed, this is in recognition that people's circumstances can change dramatically over a period of time and to give assurance of their continued suitability.

#### What happens if I or my manager raises an issue?

If a potential area of concern is identified by you or your manager the circumstances will vary on what this means and how this can be best managed.

The relevant departmental or organisational security office will assess the concern and consider if additional checks need to be made or if they need to speak to the individual or their manager.

#### If I know there is something I should discuss but don't want to do so on this form how do I raise it?

ASAF are confidential records only shared with those engaged in security or managing a security issue. You should never wait to raise a concern either about yourself or a colleague and can approach your security unit directly at any time. Individuals should be aware that failure to provide requested information on an ASAF or providing false information could itself be considered a security breach.

## I have a DV or Enhanced SC Clearance - Will you actually withdraw my clearance if I don't complete this form?

In some circumstances. This process is an essential part of providing assurance across an organisation that those entrusted with our most sensitive assets remain aware of their responsibilities and committed to

#### Will this affect/ be linked to my performance review?

The ASAF is not directly linked to the Annual appraisal process. If there are issues or concerns around performance these should be reflected in the performance management process.

#### Part A – Individual's Annual Security Appraisal Form

**Date of Issue:** (to be completed by local security unit/security controller/vetting authority) **Issued by:** (name of local security unit/vetting authority. PLEASE INCLUDE DETAILS RELATING TO HOW TO RETURN AND HANDLE THIS FORM)

If completing by hand, please write in **BLACK INK** using **BLOCK LETTERS** 

#### SUBJECT DETAILS

a.	Surname:
b.	Forename(s):
c.	Date of Birth:
d.	Staff Number (or Company details if a contractor):
e.	Current Work Address:
f.	Telephone Number:
g.	Clearance Currently Held:
h.	Period of Security Appraisal: From: To:

Completing an annual 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 A before passing Part B 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 the vetting authority or your Departmental or Site Security Officer 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 – TO BE COMPLETED BY VETTING SUBJECT

#### 1. Personal Circumstances

a. Have your personal circumstances changed (e.g. change in marital or civil partnership status or partner, significant change in financial circumstances, e.g. bankruptcy)?

b. Have you been arrested or cautioned by the police (inc. by military police if relevant) in the last 12 months?

If yes, you should notify your local security unit/security controller and where relevant complete a Change of Personal Circumstances form.

#### 2. Personal Concerns

a. Have you experienced/ are you experiencing any serious personal difficulties during the appraisal period (e.g. ill health, legal troubles, domestic/marital problems)?

b. Has the amount of alcohol you regularly consume increased?

c. Please estimate the number of units of alcohol that you regularly consume in a week:

d. Have you experienced an alcohol-related illness or has your performance at work been affected by your consumption of alcohol?

e. Have you taken illegal drugs or had any issue with prescription medication in the last 12 months?

f. Have you sought medical advice or received treatment for alcohol or drug use/addiction in the last 12 months?

#### 3. Personal Associations

a. Have you associated with any political or religious group that have views which conflict with your department's or organisation's values, goals or policies (includes any conversations or contact either in person, by phone, through social media or any other route)?

Yes	No
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Information contained in this document may be subject to exemption under the Freedom of Information Act (in particular the National Security exemptions in sections 23 and 24). Before considering information in this document for release under the Act, you should contact the National Security Secretariat in the Cabinet Office for advice.

Yes			No
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Yes	No
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No

No

Yes

Yes

No

Yes

b. Do you or any of your close family or friends have assoc	iations (ir	ncluding overseas
connections) with individuals, organisations that could cause c	oncern or	be used to place
pressure upon you as an individual?		
	Yes	No

c. Have you conducted any activity or formed any connections online/through social media etc. that could be exploited or used to apply pressure on you?

d. Have you publically discussed e.g. through social media or personal profiles details about your role and/or security clearance which could make you vulnerable to be targeted by an external actor? No

e. 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)

#### 4. **Employment in the Department or Company**

a. Do	you have	any res	ervations,	moral	or otherw	vise, a	about	any	aspect	of your	work	or the
wider	activities	of your e	employer/	govern	ment org	anisa	ation?					

b. Have you been the subject of any disciplinary action, complaint or grievance in this period?

c. Have you committed any security breaches in the period in question? If so, please give details:

#### If you have answered yes to any of the questions in sections 2-4, please give details on a separate sheet affixed to this form. STATEMENT

- I understand my obligation to inform the Departmental, Site Security Officer, Security Controller or vetting provider (as required by the policy in my area) of any material changes in my circumstances.
- I have today passed Part 2 of this form to the appropriate line manager/supervisor.

Signature: ...../...../...... Date: ...../...../

PLEASE RETURN PART A AS PER THE HANDLING INSTRUCTIONS ABOVE AND ASK YOUR MANAGER TO COMPLETE PART B

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Yes

Yes

Yes

Yes

Yes

Yes



No

No

No

No

#### Part B – Line Manager's assessment of the Annual Security Appraisal Form

#### Date of Received:

**Issued by:** (name of local security unit/vetting authority. PLEASE INCLUDE DETAILS RELATING TO HOW TO RETURN AND HANDLE THIS FORM)

The annual Security appraisal of the vetting subject named below is now due and you are understood to be the Supervising Officer for that individual.

Line Managers/Supervising Officers are required to complete an annual security appraisal for individuals in DV posts (or those with Enhanced SC clearance) Appraisals should provide an honest, accurate assessment of the subject's character, conduct and reliability.

#### If you do not consider yourself suitable to assess the individual who has passed you this form it is your responsibility to identify who is and to ensure they complete the following

If completing by hand, please write in **BLACK INK** using **BLOCK LETTERS** 

#### SUBJECT DETAILS (who you are completing the form for)

i.	Surname:	
j.	Forename(s):	
k.	Date of Birth:	
I.	Staff Number (or Company details if a contractor):	
m.	Current Work Address:	
n.	Telephone Number:	
о.	Clearance Currently Held:	
p.	Period of Security Appraisal: From:	То:

#### PART 2 – TO BE COMPLETED BY LINE MANAGER OR SUPERVISING OFFICER

#### Your details

Surname:
Forename(s):
Current Work Address (inc. contact number):
Telephone number:

#### 1. Contact with the Subject

- a. For what period has the Subject been under your supervision? 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:

d. Do you have any reservations about supervising the subject/ accounting for their reliability in this context? (You should highlight any concerns, however small they may seem.)

#### 2. Personal Qualities

If you have any concerns regarding the following aspects of the subject, provide details in the further information box at the end of this section.

Do you have any concerns regarding the:

a. Individual's approach and commitment to their job or work performance over the appraisal period?

Yes

b. Individual's Security Awareness (e.g. their attitude towards personal, physical and IT security procedures). <u>Please note any security breaches or poor security behaviour that have occurred during the period involving the individual:</u>

Yes	No
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Further Information (if relevant):

#### 3. Behaviour

a. To the best of your knowledge, has the Subject shown any evidence of:

Behaviour	Yes	No
Misuse of drugs?		
Misuse of alcohol?		
Unreliability/dishonesty/untrustworthiness/indiscretion?		
Significant financial difficulties or unexplained affluence?		
Conduct liable to lead to vulnerability to blackmail?		
Views or actions conflicting with your organisation's		
values or (where applicable) the Civil Service Code?		

If yes please give details below. If necessary please continue on another sheet

#### 4. Other Information

a. Are you aware of any other grounds that might cast doubt upon the Subject's continued suitability for security clearance? If so, please give details below. If necessary please tick here and continue on a separate sheet, which should be attached to this form when returned.