



Ministry
of Defence

Private Venture Security Grading and Exhibition Clearance Procedures Guidance

For Government and Industry

PV/EX

Approved by	Name	Organisation	Date
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PV Security Grading and Exhibition Clearance Procedures Guidance

Contents

Section One	Purpose of Private Venture (PV) Security Grading and PV Exhibition Clearance Applications <ul style="list-style-type: none"> • Author of this guidance. • Who is this guidance for?
Section Two	Who should apply for PV/Ex? <ul style="list-style-type: none"> • MOD Form 680 linkage. • Exhibition Clearances link to Export Licences.
Section Three	About the PV/Ex Procedures <ul style="list-style-type: none"> • PV/Ex Application Targets • PV/Ex Validity • PV/Ex Outcome Appeals • Protection of PV/EX Application material • PV/Ex Application Limitations • Privileges to Create PV/Ex Applications • Completing the Electronic PV Security Grading Application • Completing the Electronic PV Exhibition Clearance Application • PV/Ex Application Progress Queries
Section Four	Previous PV/Ex Records <ul style="list-style-type: none"> • Migrated Data Limitations. • Migrated Data Industry Action.

Section One

Purpose of Private Venture (PV) Security Grading and PV Exhibition Clearance Applications

This guidance provides general background information to the Private Venture (PV) Security Grading and PV Exhibition Clearance (PV/Ex) procedures.

The PV Security Grading process is the means used by the Government to assess the national security sensitivity of defence related equipment funded and developed by UK industry and allocate a national security classification accordingly.

The PV Exhibition Clearance process is the means used by the Government to assess the potential for exposure of security sensitive/classified material during exhibition, and to identify any conditions or provisos to be complied with to ensure that no security sensitive/classified material is released during exhibition.

This guidance supports the requirement set out in the Security Policy Framework (SPF), issued by the Cabinet Office <https://www.gov.uk/government/publications/security-policy-framework>, and the OFFICIAL-SENSITIVE Security Conditions for UK Contracts.

Author of this Guidance

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Who is this guidance for?

Government Departments and UK Defence Industry.

Section Two

Who should apply for PV/Ex?

In accordance with the obligations established in: the UK Government Security Policy Framework (SPF); the OFFICIAL-SENSITIVE Security Condition for UK Contracts; and/or UK Export Licensing/Release of Military Information (MOD Form 680) conditions, UK Industry are required to obtain MOD Security Grading and Exhibition Clearances for their defence related PV products.

For products developed under MOD funding, the security gradings applicable to the contract activity and resultant equipment are identified in the contract Security Aspects Letter (SAL); therefore, there is no requirement to apply using the PV/Ex process.

Any Exhibition Clearances relating to MOD programmes and equipment should be obtained from the relevant Contracting Authority (e.g. DE&S Project Team), by whatever means appropriate to obtain this formal approval according to the project. This is not currently available using the SPIRE PV/Ex process.

MOD Form 680 linkage

The MOD Form 680 procedure is the means used by the Government to assess the release of security classified equipment and information to foreign entities. In accordance with MOD security requirements all companies must have an MOD Form 680 approval for the release to foreign entities of either equipment or information about equipment with a classification of OFFICIAL-SENSITIVE or above.

Given that the basis of the MOD Form 680 process is the security classification of material to be released, it is a prerequisite to have obtained formal notification from the MOD on the security grading. For PV equipment, this can only be obtained from DSR-STInd under the PV Security Grading process.

The MOD Form 680 procedure is administered by Export Control Joint Unit (ECJU) – MOD Team. MOD Form 680 applications can only be submitted electronically on SPIRE. Further MOD Form 680 guidance is available on SPIRE and at the following link:

<https://www.gov.uk/government/publications/ministry-of-defence-form-680-procedure-guidance> .

Exhibition Clearances Link to Export Licences

If your promotional activity abroad involves the export of controlled goods or technology, you will need to apply to the Export Control Organisation (ECO) in the Department for International Trade (DIT), for an export licence. If you are in any doubt about whether or not your activities are licensable, then you should contact ECO at: eco.spire@trade.gov.uk

The Open General Export Licence: Export For Exhibition - Military Goods, condition and requirement states: “prior to exporting goods pursuant to this licence written approval to exhibit the goods from either the MOD Contracting Authority, or MOD Sponsor for goods relating to MOD equipment and programmes, or from Defence Security (Scientific & Technical/Industrial) (DefSy(S&T/Ind)¹) for defence related Private Venture (PV) goods including, where appropriate details of ‘en route support’, at an exhibition in the country of destination for which the export is intended”. Therefore, for PV licensable goods, an Exhibition Clearance letter must be obtained under the electronic application process on SPIRE prior to the export of goods utilising this open licence.

¹ It is to be noted that DSR-STInd is the new title for Def Sy(S&T/Ind). Open General Export Licences will be modified to reflect DSR-STInd in due course.

Section Three

About the PV/Ex Procedures

The PV/Ex procedures are administered by the Directorate of Security and Resilience (DSR), Scientific, Technical & Industrial security team (DSR-STInd), in the Ministry of Defence.

PV/Ex applications can only be made electronically on SPIRE. However, in recognition of the fact that the maximum level of classification permitted to be uploaded onto SPIRE is OFFICIAL-SENSITIVE (RESTRICTED) and the potential requirement to submit material classified higher than this level (particularly for security grading), a process has been established by which the application can be instigated electronically but enables the more highly classified supporting information to be submitted separately by a means appropriate to its security classification.

In any subsequent MOD Form 680 or Export Licence Application, you should quote the unique PV/Ex reference number which will be generated by SPIRE when you apply. This PV/Ex reference number should also be used in any other related correspondence and when any enquiries are being made about a particular application to MOD.

PV/Ex application targets

When receiving your application we aim to process PV Security Grading applications within 40 working days and Exhibition Clearance applications within 20 working days. You should note that only in exceptional circumstances will we agree to a shorter period of reply; however, you can request a response in a shorter timescale; please provide full details justifying the need, although there can be no guarantee that the deadline will be met.

When an application is received, it may be necessary to circulate it to specialist advisers in the MOD, to ensure consistency with MOD equipment gradings, especially for those products that are variants² or derivatives³ of equipment developed for the MOD.

PV/Ex validity

PV Security Grading responses are valid indefinitely until either revoked or the product graded changes.

PV Exhibition Clearances are similarly valid indefinitely until either revoked or the material concerned changes and, unless specifically stated, are applicable for any future exhibitions worldwide.

PV/Ex outcome appeals

The PV/Ex assessments are made upon the information provided in the application and there is no appeals process. However, if further information in support of the application becomes available, or circumstances change that could alter the basis of the original assessment, then a further application can be made.

² **Variants** are standard defence equipment under development or in production, e.g. aircraft, military vehicles or ships, etc. with non-standard equipment or fittings, offered to meet special customer requirements or to avoid security or commercial difficulties associated with the sale of an item in-Service with UK Armed Forces.

³ **Derivatives** are equipment for military or civil use that is not based on standard Service designs but is dependent upon expertise or technology acquired in the course of defence contracts.

Protection of PV/Ex application material

We will handle your completed application form as OFFICIAL-SENSITIVE-COMMERCIAL to safeguard the information it contains and its potential Intellectual Property.

PV/Ex application limitations

Applicants are to recognise that the MOD IT systems are strictly limited by the file formats and types they are permitted to access. Therefore, if you intend to upload material that is not a standard Microsoft Office package format (e.g. “.doc”, “.xls”, “.ppt”, etc.); or is not a standard open format (i.e. “.wmv”, “.pdf” and “.jpg”), then MOD may be unable to review this material and may need to subsequently request you to provide the material in a different format/manner.

Furthermore, due to SPIRE and MOD IT systems operating restrictions, you will not be allowed to upload executable files (e.g. “.exe”, self extracting zip file, encrypted files, etc.).

The maximum document size permitted for upload onto SPIRE is 50MB.

Information on SPIRE and the application form must be kept to OFFICIAL-SENSITIVE or below. If you need to provide material classified above OFFICIAL-SENSITIVE in support of your application, you must annotate the SPIRE application accordingly and send it to us by the appropriate means (consult your company security controller for details).

Documentation may be sent by post if there is reason to suspect the material may be classified higher than OFFICIAL-SENSITIVE (RESTRICTED) or the volume of material exceeds the size restrictions placed on SPIRE. It is mandatory to provide supporting documentation by either uploading it to the application directly or by advising on the application that it has been sent by post.

If supporting documentation is to be sent by post then the applicant is still expected to raise the application on SPIRE. They will be advised to include the automatically generated PV/Ex reference number (provided on submitting the application), onto the postal document to help identify it when it is received and enable the application to continue to be recorded and managed within the SPIRE system.

The existing SPIRE Applicant Record (SAR) security model will be used, therefore, it will be mandatory for an applicant to have registered their organisation on SPIRE prior to creating a PV/Ex application. In accordance with the general arrangements for SPIRE, every application will be associated with the team for the applicant organisation rather than an individual user. This ensures that there is no one point of contact as all contact is with one or more roles within the team. The company's SAR administrator will be able to add or remove members from a role, thereby changing the recipients of any notifications sent by DefSy to the organisation. Applicants will only have visibility of applications for organisations they are a member of, they shall not be able to view applications for any other organisations (see also Section 4 in relation to previous application migrated data).

Security Grading - Foreign Goods. The UK MOD is not the security grading Authority for goods, equipment, information or technology developed outside of the UK without any UK funding. In these instances, security grading advice should be sought from the Government of the Original Equipment Manufacturer (OEM) in accordance with their national security procedures. Any foreign Government required security classifications should be provided to the UK party by the OEM and adhered to.

Exhibition Clearance - Foreign Goods. Exhibition Clearance approval for foreign originated goods should be as determined by the national Government of the OEM (and/or other International Defence Organisations, e.g. NATO, OCCAR, etc.) and as advised to the UK party by the OEM. However, in order for UK Companies to comply with 'Open General Export Licence: Export For Exhibition - Military Goods' conditions and requirements, the PV/Ex process can be used to obtain an Exhibition Clearance letter from the MOD for these foreign goods, on the basis that it is to be exhibited in accordance with any provisos or caveats applied by the Government of the OEM.

Privileges to create PV/Ex applications

It is recognised that the way in which access to the SPIRE system is managed differs from company to company, therefore, you are advised to contact your Export Compliance Manager / Facility Security Controller to determine how it is managed within your Company. However, it will be mandatory for an applicant to have registered their organisation on SPIRE prior to creating a PV/Ex application. The company's SAR administrator will be required to ensure that SPIRE access privileges for individual applicants enable them to create PV/Ex applications, in accordance with their Company access policy; this will require existing privileges to be modified.

Completing the electronic PV Security Grading application

An applicant will be requested to provide the following information on a PV Security Grading application:

- Applicant reference
- Company name
- Company address
- Reference numbers of previous relevant gradings and an explanation of changes
- Venture name
- Technical description
- Date grading required by
- The Reason for the Date the grading is required by
- Whether the venture is a variant or derivative of an MOD funded project and an explanation of changes
- Description of any security advice received from other departments within MOD
- Other evidence or examples that may assist with assessment
- Technical documentation

Not all of this information will be mandatory and, depending on the security implications or file format/size restrictions, documentation may be sent by post. The applicant will be requested to provide this information on a number of application screens. Further guidance information is included within the SPIRE system.

Completing the electronic PV Exhibition Clearance Form

An applicant will be requested to provide the following information on an Ex application:

- Applicant reference
- Company name
- Company address
- Reference numbers of previous relevant approvals and an explanation of changes
- Exhibition details.
- Date of first exhibition
- Date clearance required by
- Documentation (e.g. publicity material, photographs, films/videos)

Not all of this information will be mandatory and, depending on the security implications or file format/size restrictions, documentation may be sent by post. The applicant will be requested to provide this information on a number of application screens. Further guidance information is included within the SPIRE system.

PV/Ex application progress queries

Any questions on the progress of an application should be directed to the relevant DSR-STInd desk officer identified as dealing with your case on each application within the SPIRE system.

Section Four

Previous PV/Ex Records

As part of the PV/Ex programme, previous DSR-STInd PV/Ex records have been migrated onto the SPIRE system.

The intent of this migration is to enable applicants to have access to their previous PV security grading outcomes and PV Exhibition Clearance letters, and to support the referencing of these previous outcomes using the originally provided historical references (e.g. PV1234 for PV security grading outcomes and D/DefSy/(S&T/Ind)/06/38/123/45 for Exhibition Clearances).

Migrated Data Limitations

However, as part of this migration activity, it has been necessary to limit permissions to the records to ensure that applicants are only able to see those PV/Ex applications submitted by them and has necessitated the cross-referencing of the details contained in these historic references to the organisations registered for the SPIRE Applicant Record (SAR).

In those situations where a definitive match could not be made (for example, where single companies have multiple Organisation Names registered with SPIRE), the migrated data has not been allocated to any particular organisation name/SAR.

Migrated Data Industry Action

If any applicants are aware of any previous PV Security Grading outcomes or Exhibition Clearance letters from their company that they cannot find in the SPIRE PV/Ex system, they are to contact DSR-STInd [E-mail: DSR-STInd@mod.uk], providing the reference details and the appropriate organisation name/SAR, so that they can be allocated appropriately.