



Form 680 Policy and Guidance for UK Companies and UK Government Departments

Version 1.0 – August 2024

Version History

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PART 1 – F680 Policy

1 Introduction

- 1.1 The Form 680 (F680) is primarily a security procedure, that enables the UK Government to control when, how, and if Defence Related Classified Material is released by UK Companies to foreign entities, generally for the purposes of export promotion or sales of equipment or services. With effect from 16 August 2024 the procedure also includes the requirement for F680 approval for the release of United States International Traffic in Arms Regulations (ITAR) Material to any foreign entity.
- 1.2 It is UK Government policy to support responsible defence exports that are consistent with UK security and foreign policy objectives and with export control legislation. There is a presumption to approve F680 applications unless doing so would be contrary to these objectives.
- 1.3 This policy is a supplement to [Government Functional Standard GovS 007: Security](#) issued by the Cabinet Office. This policy is directed at UK Companies (e.g. those established and operating in the UK, registered with Companies House), as well as the UK Government Departments involved in the F680 process.
- 1.4 Any questions regarding this policy should be directed to the Export Control Joint Unit (ECJU) MOD Team as they are the Implementing Authority for the F680 procedure. Contact details are included below:

MOD Team, Export Control Joint Unit, Department for Business and Trade
Old Admiralty Building, Admiralty Place, Whitehall, London, SW1A 2DY
[Click here to contact the ECJU MOD Team.](#)

2 Scope of Material for which the F680 Applies

- 2.1 For the purpose of this policy, the term 'Defence Related Classified Material' includes any information, equipment or technology that has been given a security classification by the UK MOD. The term also includes material held by UK Companies which has been given a security classification by a third party e.g., NATO or another country for which the UK MOD is responsible. Defence Related Classified Material includes tactics, techniques and procedures that have any of the following:
 - A military capability;
 - Scientific or technical content;
 - The ability to reveal operational performance characteristics;
 - The ability to reveal any potential UK Armed Forces limitations or vulnerabilities

or their potential inability to counter technological capability.

- 2.2 Before undertaking any targeted promotion or demonstration or entering into any contractual commitments involving the sale or release of Defence Related Classified material graded UK OFFICIAL-SENSITIVE or above to a foreign entity, a UK Company must obtain F680 approval from the Export Control Joint Unit (ECJU) MOD Team. This requirement also applies to equivalent Internationally Classified material (e.g. material graded NATO RESTRICTED or above, OCCAR RESTRICTED or above, etc.).
- 2.3 This includes material graded UK OFFICIAL-SENSITIVE or above either developed to meet a UK MOD requirement or Private Venture (PV) material, as formally advised in a Security Aspects Letter (SAL) issued by the relevant Contracting Authority, or PV Security Grading issued by the UK MOD Directorate of Security and Resilience.
- 2.4 It should be emphasised that F680 approval is required before a UK Company undertakes the targeted promotion or demonstration of Defence Related Classified Material graded as UK OFFICIAL-SENSITIVE or above, even when conducting the promotion or demonstration at the UK OFFICIAL level, unless the material concerned has already been released into the public domain following approval from UK MOD, e.g., via exhibition approval.
- 2.5 An F680 is not required for the targeted release of Defence Related Classified Material that the UK MOD has security graded UK OFFICIAL (or identified as not relating to HMG work and therefore not graded under Government Security Classification Policy), unless the release necessitates the associated release of information (e.g. tactics, training, doctrine, etc.) graded as UK OFFICIAL-SENSITIVE or above, or the release involves US ITAR material.
- 2.6 An F680 approval is also required before a UK Company releases US ITAR material to any foreign entity. For the purposes of this policy US ITAR Material means defence articles including technical data relating thereto or derived therefrom that is subject to controls under the US ITAR.
- 2.7 F680 approval is required prior to the transfer of any classified material graded OFFICIAL-SENSITIVE or above (including international classified equivalents) or any ITAR material to any foreign entity, including where these transfers occur within the UK borders.
- 2.8 For classified material that does not include ITAR, an F680 is not required for transfers to other UK entities, however, other Government approvals mechanisms may be (e.g. F1686 or other HMG Contracting Authority notifications and approvals).
- 2.9 In specific regard to the transfer of ITAR material, the current F680 online system (administered through the SPIRE Export Licensing system) cannot process applications where there is no foreign recipient. Accordingly, there is no requirement for F680 approval for releases of ITAR material to other UK recipients.

- 2.10 There will not be a general requirement for F680 approval for releases of ITAR material, to US recipients, however, we understand there are some instances where US Government approval is required prior to the release of ITAR material from the UK to the US. Accordingly, in these instances, a F680 could be expected to also be applicable.
- 2.11 The requirement for F680 approval does not change any of the obligations, requirements, exemptions or approvals necessary from the US Government in regard to ITAR, or any associated assets subject to special controls or export controlled articles subject to US Laws and Regulations, particularly in regard to any approvals or exemptions related to any foreign nationals or dual-nationals employed within UK Companies.
- 2.12 The F680 applications for ITAR material are able to be fairly broad in scope, so that the applications can be raised to suit business requirements, potentially covering all Unclassified ITAR releases in support of a specific programme or business area.
- 2.13 As F680 approvals for UNCLASSIFIED ITAR material are expected to be valid for 48 months, any requirements for amendment during this validity period should be agreed with ECJU. Material changes (i.e. those adding new countries or new USML Categories of ITAR material) will generally necessitate a new F680. Non-material changes (including changes to company registration details, names or addresses which are typically published by DDTC as a web notice) do not need to be updated immediately and could be amended the next time the F680 for UNCLASSIFIED ITAR material is updated, on renewal or upon HMGs request during an assurance activity.

3 Specific Activities Covered by the F680

- 3.1 UK applicants must include as much detail as possible in their applications. Applicants must specify exactly what they intend to release, to whom and for what specific reason. If the release of material is part of a longer-term objective, for example looking forward into the future to support a developing project which might include an element of industrialisation then this must be specified in the application. Applicants should also supply any brochures, technical data, project plans or other material which explain what the UK Company is looking to achieve. If the applicant is in doubt about what to include, then they should contact the ECJU MOD Team.
- 3.2 UK applicants can request permission to conduct the following specific activities in their applications:
- **Market Survey/Initial Discussions/Promotion (Not considered appropriate for Unclassified ITAR releases only).** This covers any targeted promotion of a product to a potential customer or customers. That means going to a potential customer, or them visiting a UK Company. This includes meetings that may be hosted by UK Government Organisations. It covers any discussions in support of the promotion or sale of a product to a potential customer. This includes discussions with overseas partners/companies in support of a sale to a potential

customer that involve the release of Defence Related Classified Material.

- **Demonstration in the UK or Overseas (Not considered appropriate for Unclassified ITAR releases only).** A demonstration is defined as carrying out a 'live' activity to showcase a product in order to promote its sale to a potential customer. An evaluation or trial constitutes a demonstration. A demonstration may include use of the actual product, simulations of the product or laboratory-based exercises. It may include using a substitute for the actual product, but in that case, the substitute product must be included in the F680 application as well as the intended product. Demonstration may be carried out by the UK Company, or it may include handing over the product, or its substitute, to the potential customer for a defined period. It is expected that the product will either be returned to the UK following the demonstration or destroyed in accordance with the appropriate procedures for its classification. An overseas demonstration does not necessarily have to take place in the potential customer's country, e.g., if another country operates the equipment, but if so, all entities involved must be included in the F680 application. Please note that Demonstration is not training.
- **Training (Not considered appropriate for Unclassified ITAR releases only).** This covers the release of training materials or the delivery of training in person to foreign entities in the UK or overseas. Basic instruction on the operation of a product that has been sold to a customer is not considered training as it is considered implicit in the approval of the supply of the product. However, training in the operational employment of the product, including tactics, techniques and procedures, above and beyond basic function does require specific F680 approval and falls under this category. Training does not include any instruction required to support local assembly/manufacture, which should be detailed under the request for local assembly/manufacture in the application. However, any other training of Overseas Companies does constitute provision of training and therefore falls under this category.
- **Supply.** This covers the release of the actual classified product or equipment to foreign entities in the UK or overseas. This does not cover the release of any publicity material, training or information released in the categories covered above leading up to the eventual supply of the classified product or equipment. Any F680 approval for supply is not to be misconstrued as a replacement to the requirement for any appropriate Export Licence, it is also not to be considered an indicator of an Export Licence approval as it does not obtain scrutiny against all of the export licence criteria.
- **Through Life Support (including maintenance and repair) (Not considered appropriate for Unclassified ITAR releases only).** Through life support encompasses all aspects in an export programme relating to in-service support, e.g., maintenance, obsolescence management, enhancements, disposal. Carrying out work involving Defence Related Classified Material with an overseas partner in support of a sale to a customer falls under the category of

through life support. A valid F680 approval covering through life support is required throughout the life of an export programme from delivery to disposal, where the UK Company maintains its involvement. Any offers of different in-service support arrangements, or enhancements, require F680 approval for marketing/promotion.

- **Local Assembly (Not considered appropriate for Unclassified ITAR releases only).** This covers the requirement for technology transfer to a foreign company to undertake the assembly of systems, subsystems and equipment prior to release to the foreign Government/user. Information provided in relation to this activity should scope the extent of Local Assembly activities and identify the requirement to release classified information.
- **Local Manufacture (Not considered appropriate for Unclassified ITAR releases only).** This covers the requirement for technology transfer to a foreign company to undertake the manufacture of systems, subsystems, equipment or components to meet offset requirements. Information provided in relation to this activity should scope the extent of Local Manufacturing activities and identify the requirement to release classified information.

4 Submission of F680 Applications

- 4.1 F680 applications must be submitted to UK MOD via the SPIRE online licensing system. [You can access SPIRE here.](#)
- 4.2 SPIRE is a web-based e-business environment. It enables applications for Export Licences, F680, PV Grading, Exhibition Clearances and Gifting to be made on-line, through the SPIRE system. SPIRE is owned by the Department for Business and Trade (DBT). The Export Control Organisation (part of the ECJU) in DBT is responsible for all SPIRE applicant and company registrations.
- 4.3 Please note all F680 queries should be directed to the [MOD team in the ECJU](#).
- 4.4 UK applicants are strongly encouraged to contact the ECJU MOD Team at the outset if they are embarking on a complex programme which will result in future F680 and export licence applications. The ECJU MOD Team can arrange a meeting between the applicant and MOD subject matter experts to assist in preparing the F680 applications.
- 4.5 Previous applications or approvals are taken into consideration when a new application includes the same type of equipment to the same end-users. Reference numbers for previous applications should be included in any new request as this will assist in processing the new application.

- 4.6 Where there is a prospect that Material released under F680 approval may, in turn be re-exported from the original destination, this must be stated in the application. This would include the transfer of US ITAR Material to a foreign entity in the UK. Additional F680s may be required for the release of the originally approved material to the re-export destinations.
- 4.7 In regards to the addition of US Unclassified ITAR into the F680 process, there needs to be sufficient identification, or notification from the US Government, that ITAR applies and appropriate inclusion of any references within any F680 application to enable cross-referencing and coordination of any assurance or inspection activities.

5 F680 Application Processing Times

- 5.1 The ECJU MOD Team aims to respond to applications within 30 working days, but some applications may take longer depending on the nature of the information or equipment in question and the proposed destination.
- 5.2 Applicants may request an application to be processed faster than the target time of 30 working days. Applicants will need to explain the need for urgency although there is no guarantee that an outcome will be given in a shorter timescale. Every effort will be made to meet such requests but this may be at the expense of other applications submitted by the same UK Company so it should be used sparingly.
- 5.3 Examples of when swift assessment of an application is necessary include humanitarian purposes such as search and rescue/recovery or when routine processing would impact UK defence interests such as UK Government-led export campaigns that may arise at short notice. The ECJU MOD Team requires evidence from the relevant UK Government Department in support of such requests. Short-notice requests for routine renewals of approvals or requests led by overseas customers' demands would not be considered sufficient justification and applicants should manage the expectations of their customers. For further information see the [Notice to Exporters 2021/06](#).

6 Requests for Further Information

- 6.1 Any queries regarding an application will be sent by UK MOD to the applicant as a Request for Further Information (RFI) via SPIRE. The applicant should aim to respond to an RFI as soon as possible as the application will be placed on hold pending a satisfactory response. If a response is not received within one month the application will usually be withdrawn by UK MOD.

7 F680 Assessments

- 7.1 F680 applications (with the exception of applications exclusively for UNCLASSIFIED ITAR material) are assessed against three criteria that form part of Strategic Export Licensing Criteria. The three criteria under which F680 applications are assessed take

into account the UK's national security and foreign policy interests. These are:

- Criterion One – UK's international obligations – Foreign, Commonwealth and Development Office (FCDO) lead
- Criterion Five – Security of the UK and its allies – MOD lead
- Criterion Seven – Diversion to an undesirable end-user – MOD/FCDO joint lead

7.2 F680 applications are assessed by specialist advisers in MOD and the FCDO. Other advisers may be consulted depending on the nature of the application.

7.3 The UK Government publishes a list of arms embargoes enforced by the UK. These may be supplemented by policy restrictions on exports to certain end-users which are announced to Parliament and reported in Hansard. Government Ministers may also deliver policy statements to Parliament about events in a particular country which may affect export licensing and MOD Form 680s assessments. [Information on arms embargoes can be found here.](#)

7.4 Applications exclusively for UNCLASSIFIED ITAR material will generally only include a consideration or proviso that confirms the US Government are content with the proposed further release.

8 F680 Approvals and Refusals

8.1 Once the ECJU MOD Team receives recommendations from advisers, an outcome letter to the applicant will be issued electronically via SPIRE. The letter will contain details of the information, equipment or technology and destination for which clearance was requested.

8.2 Where the applicant is not a member of the export control or compliance team of the UK Company concerned, the applicant must copy all outcome letters issued by the ECJU MOD Team to their export control or compliance team.

8.3 Approval letters set out the activities that are approved under the F680 and may include provisos that must be adhered to. These provisos may advise that certain categories of information or technology are not releasable. Provisos also explain actions a UK Company must take before certain material can be released. Failure to comply with provisos may result in a suspension or revocation of an extant approval or subsequent F680 and export licence applications being refused.

8.4 If a F680 application is refused the applicant will be advised of the Criteria against which the decision was made. Applicants can re-apply if they consider that the circumstances have changed. They should explain in any new application changes which might enable a new F680 application to be approved.

- 8.5 F680 approvals for the release of Unclassified ITAR and classified material graded up to and including OFFICIAL-SENSITIVE are valid for 48 months. Approvals to release material of a higher classification are valid for 24 months.

9 Suspension or Revocation of Extant F680 Approvals

- 9.1 The UK MOD has a mechanism on SPIRE to allow for the suspension or revocation of extant F680 approvals. Suspension of an approval is a temporary measure and may subsequently be reinstated. Revocation is a permanent measure, so if the applicant wished to pursue the activities previously approved a new F680 application would be required.
- 9.2 Suspension and revocation of F680s will not be invoked automatically or lightly but would be triggered if new concerns arise. For example, this could be triggered by a conflict or crisis that changes the risk suddenly. It may not apply to all applications for a specific country and could instead be limited to certain types of equipment or end-users. A case-by-case assessment of a particular situation will be necessary to determine whether suspension or revocation is appropriate. UK MOD will endeavour to inform UK Companies as soon as possible of any suspension or revocation via SPIRE.

10 F680 Enforcement

- 10.1 Any reports received by the UK Government regarding misuse of F680 approvals will be investigated by the UK MOD and may be treated as a security breach.
- 10.2 In relation to Open General Export Licences (OGEL), a DBT Compliance Officer may ask to see the corresponding F680 approval for goods, technology or software exported under the OGEL, where this is a condition of the licence. Failure to produce a valid F680 approval might result in action being taken by DBT against the exporter.

11 Assurance Inspection

- 11.1 The UK MOD has introduced an assurance inspection requirement to ensure the following:
- That appropriate F680 applications have been raised for any potential release of material security graded OFFICIAL-SENSITIVE or above.
 - That appropriate F680 applications have been raised for any potential release of any US Unclassified ITAR items.
 - That the applicant has corresponding records of approval from the US Government for any further releases of ITAR material.
 - That applicants are compliant with any provisos, restrictions or recommendations identified on F680 outcome letters.
- 11.2 The intent is for these assurance inspections to be conducted, as far as practicable, in

conjunction with another Government inspection (e.g. DBT Compliance Audit, FSC Security Inspection, etc.) to minimise the impact on UK Companies.

- 11.3 These inspections are going to be conducted by DE&S PSyA ISAC Inspection Officers, following appropriate training from ECJU and the pertinent F680 Advisors, in conjunction with FSC inspections, where already undertaken.
- 11.4 The inspection schedule is dependent upon the number of UK Companies requiring inspection assurance, the breadth of the inspection activity (ranging from a full FSC inspection through to an inspection of facilities only dealing with Unclassified ITAR) and the resource availability of the Inspection Team, however, the ambition is for at least an inspection every couple of years.
- 11.5 For UK FSC security cleared Company facilities, the requirement for inspection will exist for as long as they remain security cleared and in possession of classified material.
- 11.6 For UK Company facilities under contract to comply with the UK OFFICIAL and OFFICIAL-SENSITIVE Security Conditions, the requirement for inspection will exist for as long as they remain in possession of UK OFFICIAL-SENSITIVE classified material.
- 11.7 For UK Company facilities that are part of the Authorised User (AU) community, the requirement for inspection will exist for as long as they continue to remain part of this AU community.
- 11.8 For UK Company facilities only in possession Unclassified ITAR the requirement for inspection will only relate to the period of time that the UK recipient is in possession of ITAR material.
- 11.9 Unsatisfactory inspections could lead to retraining, further scrutiny of applications, possible withdrawal of HMG contracts or security clearances, potential prosecution for breaches of classified material security graded OFFICIAL-SENSITIVE or above and US Government breach of ITAR investigations and prosecution.

12 Release of F680 Data to Third Parties

- 12.1 It is recognised that the information included in F680 applications may be commercially sensitive. Therefore, the UK Government will not release information provided by UK Companies in their F680 applications to non-Government third parties without the permission of the applicant. Nonetheless, any request for information contained in F680 applications received from a third party under the Freedom of Information Act (2000) will have to be considered on a case-by-case basis in a manner consistent with the Act. This includes the applicability of the exemption at Section 43 (Commercial Interests).
- 12.2 The F680 approval letter is usually graded OFFICIAL-SENSITIVE and should be handled accordingly. If it is felt necessary to discuss specific provisos with a third party,

then please contact the ECJU MOD Team to discuss. It is likely that any approval letter relating only to US Unclassified ITAR, wouldn't need to be graded above OFFICIAL.

- 12.3 Defence & Security Exports (DSE) support the efforts of UK Defence Companies with export sales. If an applicant agrees by ticking the relevant box on the F680 application, UK MOD will provide DSE with specified data extracted from the application for the purposes of supporting the export. DSE does not have access to SPIRE and will not release F680 data to non-Government third parties.

13 Mergers and Acquisitions

- 13.1 If a UK Company holding F680 approvals changes its name or is assimilated into another company they should write to the ECJU MOD Team providing a copy of the formal notification of change, such as a letter from the Company Secretary. If appropriate ECJU MOD Team will issue a letter to the UK Company stating that extant F680 approvals are regarded as applicable to the new legal entity.

14 Assistance and Feedback

- 14.1 F680 applicants are assigned a dedicated desk officer in the ECJU MOD Team who will manage the processing of their applications and be their point of contact for queries and advice. UK MOD welcomes feedback from UK applicants, which can be provided to ECJU MOD Team Desk Officers.
- 14.2 Notices to companies are issued on the front page of SPIRE under the F680 section.
- 14.3 Within Company organisations, the Export Control Manager, Compliance Manager or Security Controller should be able to provide advice on the use of the F680.

PART 2 – F680 Relationship to other Processes

15 Export Controls

- 15.1 Some Open General Export Licences (OGEL) require a F680 approval to be in place at the time an export is made. The OGEL will explain if one is required. Please note that F680 approval allows the release of classified material. It may be used to comply with a condition on certain Open General Export Licences (OGELs), but it is not an approval to export.
- 15.2 A F680 approval should not be viewed as an indication that an Export Licence will be approved. However, referencing an extant F680 for corresponding goods or technology to the same foreign end-user may speed up assessment of a licence by advisers as they will have some prior knowledge of the campaign.

16 Private Venture (PV) Grading and Exhibition Clearance (Ex)

- 16.1 In accordance with the obligations established in: Government Functional Standard GovS 007: Security; the UK OFFICIAL and OFFICIAL-SENSITIVE Contractual Security Conditions; and/or UK Export Licensing/Release of Military Information (F680) conditions, UK Defence Companies are required to obtain UK MOD Security Grading and Exhibition Clearances for their defence related PV products.
- 16.2 The PV Security Grading process is the means used by the UK MOD to assess the national security sensitivity of defence related equipment funded and developed by UK Defence Companies and allocate a national security classification accordingly.
- 16.3 The PV Exhibition Clearance process is also used by the UK MOD 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.
- 16.4 For products developed under UK MOD funding, the security grading 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.
- 16.5 Any Exhibition Clearances relating to UK MOD programmes and equipment should be obtained from the relevant Contracting Authority (e.g., DE&S Delivery Team), by whatever means appropriate to obtain this formal approval according to the project. This is not available using the SPIRE PV/Ex process.
- 16.6 Given that the basis of the F680 procedure is the security classification of material to be released, it is a prerequisite to have obtained formal notification from the UK MOD of the security grading. For PV equipment, this can only be obtained from the UK MOD

Directorate of Security and Resilience Team under the PV Security Grading process. [You can view information about the PV Security Grading process here.](#)

17 Security Transportation Plan (STP)

- 17.1 All UK material graded SECRET or above and internationally classified material graded CONFIDENTIAL and above, requires a Security Transportation Plan (STP) to be approved by the Industry Security Assurance Centre (ISAC) prior to export. An approved STP is also required for UK material classified CONFIDENTIAL or above, graded prior to the implementation of the GSCP in April 2014. The requirement for a STP may be identified as a proviso in F680 outcome letters. [Please contact the Industry Security Assurance Centre for more information.](#)

18 Facility Security Clearances (FSC)

- 18.1 Where a Foreign Company is named as the recipient in a F680 application it may be necessary for the UK Company to seek confirmation of a Facility Security Clearance (FSC). The MOD Defence Equipment & Support Industry Security Assurance Centre (ISAC) team will provide this confirmation from authorities in the location where the Foreign Company is located. Confirmation of an FSC is always required at SECRET or above (CONFIDENTIAL or above for pre-April 2014 material). It is also required at OFFICIAL-SENSITIVE for certain destinations and for some internationally classified material. [Please contact the Industry Security Assurance Centre for more information.](#)

19 F1686 Security Procedure

- 19.1 The F1686 Security Procedure is the mechanism by which Government Suppliers can request permission to subcontract or collaborate with Third-Party Suppliers on classified work in support of Government classified programmes. For further information [please see Industry Security Notice 2024/05.](#)

20 Defence Equipment Sales Authority (DESA)

- 20.1 DESA has delegated authority to dispose of all UK MOD-owned surplus equipment in the UK and overseas. Disposal is facilitated through a network of marketing agreements for the collection, storage, specialist marketing and sales through commercial suppliers.
- 20.2 DESA submit F680 applications where applicable. These are assessed in the same way as any other application. Please note that where marketing leads to a sale the exporter must apply for the Export Licence. This may be DESA or a commercial supplier.