



UK Atomic  
Energy  
Authority

# UKAEA Policy Manual

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**The UK Atomic Energy Authority's mission is to deliver sustainable fusion energy and maximise scientific and economic benefit.**

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# Introduction

**The United Kingdom Atomic Energy Authority (UKAEA)<sup>1</sup> strives to deliver our mission and strategic goals through our people. The leadership is committed to a Safety First, Quality Always culture that protects the environment and all who may be affected by our activities.**

## **Important notes:**

The goal of our 'work safe, home safe' culture is to ensure that everyone on our sites goes home safely each day, and to ensure that our people and environments are not exposed to harm. Key to this culture is a rigorous approach to continual improvement in our safety practices through the implementation of safe work systems and our vigorous commitment to safety. Active encouragement of the reporting of near misses, accidents and incidents is key to this aspiration.

It is the responsibility of those conducting work on behalf of the UKAEA to act consistently with these policies. Everyone working at the UKAEA is encouraged to speak up if they know of, or suspect, a breach of any of the policies. Further guidance can be found in our Whistle Blowing Policy. Failure to comply can result in disciplinary action or other sanctions.

The UKAEA shall fully comply with all relevant national and international laws and regulations. Where a conflict between UKAEA Policy and local law arises, local law shall prevail. In the event that there is no conflict between UKAEA Policy and local law, and UKAEA Policy provides a higher standard, UKAEA Policy will prevail.

These policies do not form part of any contract of employment and UKAEA may amend them at any time.

<sup>1</sup> UKAEA hereafter refers to UKAEA Group.

# Purpose & Scope

This manual contains all UKAEA policies within a single document, which undergoes regular review by the Group Executive Committee. This manual applies to UKAEA and its wholly owned subsidiaries. UKAEA policies form part of the framework<sup>2</sup> we use to work towards our mission, as such it is important everyone working with the UKAEA understands this content as it defines our approach for the delivery of sustainable fusion energy. The spirit of how we work is captured by our values, which are woven into these policies:

- **Innovation** – We will seek out ways to do things better, be that designing fusion systems or how we operate our organisation.
- **Commitment** – We believe in what we do, the importance of our mission, and doing what we can to achieve it.
- **Trust** – We strive to be open, transparent, and inclusive, so that everyone we work with believes and values what we say and do.
- **Collaboration** – We believe in the power and importance of working in partnership.

The public, our customers, partners, suppliers, shareholders, regulators, and the community in which we operate expect us to be clear on the values that underpin the type of organisation we want to be.

<sup>2</sup> 'Framework' refers to the business processes covered by the UKAEA Management System.

# Principles

The UKAEA is committed to the principles of:

## **Safety and Health**

Safety and well-being of our people is our top priority.

## **Equality of opportunity**

Diversity of thought and people who are representative of society are crucial for our mission.

## **Environmental sustainability**

We will strive for energy-efficient delivery, minimising our environmental impact.

## **Responsible management of public funds**

We will use our resources carefully and will be accountable for our investment decisions.

## **Working with business**

Strong and effective public-private partnerships are an essential part of our operation.



# Organisational Sustainability

**Policies for ensuring the organisation continues to operate in a safe, controlled, and sustainable way.**

## Safety, Health, and Environment

The UKAEA considers the safety and health of people and protection of the environment as essential values. These are achieved through the vigorous commitment of all to the continual improvement of our management systems.

For us to achieve this vision it is essential that every colleague commits to playing an active role in maintaining and improving our health and safety standards; and to fulfilling their responsibilities as set out below and elsewhere in our documented systems.

UKAEA will minimise risks by providing a safe place to work, safe equipment and safe methods of working. We will also provide the necessary instruction, training, guidance, and leadership to ensure that all colleagues are able to play their part and are fully supported in their efforts to make UKAEA a safe and healthy place to work.

## Responsibilities for Health, Safety and Environment



# Key Responsibilities and Accountabilities

Chief Executive Officer	<ul style="list-style-type: none"><li>• Demonstrate visible leadership and promote UKAEA's commitment to safety, health, and the environment</li><li>• Ensure that adequate resources are available to meet UKAEA's commitments to safety, health, and the environment</li><li>• Monitor UKAEA's progress against safety, health, and environmental key performance indicators</li></ul>
Directors/Unit Heads	<ul style="list-style-type: none"><li>• Lead by example promoting responsible attitudes and behaviours</li><li>• Ensure risks and concerns are effectively addressed</li><li>• Monitor performance and lead continuous improvement</li></ul>
Group Leaders	<ul style="list-style-type: none"><li>• Ensure safe working, lead by example, and promote safe attitudes/behaviours</li><li>• Ensure that procedures are followed</li><li>• Ensure that workplaces are safe for colleagues and visitors</li></ul>
All Workers	<ul style="list-style-type: none"><li>• Follow our 5 Golden Rules</li><li>• Be a PAL</li><li>• Follow all training and don't take short cuts</li></ul>
QSHERA Directorate	<ul style="list-style-type: none"><li>• Develop policy, strategy, and standards</li><li>• Advise, guide, and support the UKAEA organisation</li><li>• Monitor performance and support leaders to drive continuous improvement</li></ul>

## Expectations

### Leadership and Culture

- Protect and maintain the safety, health, and welfare of our workers, all who carry out work on our behalf and anyone who can be affected by our operations.
- Prevent pollution, reduce our carbon footprint, and improve biodiversity.
- Take into account environmental sustainability in procurement, services, and projects.
- Promote a culture of health, safety, and environmental protection, encouraging appropriate risk perception.

### Management of Operational Risk

- Continue to put in place effective controls for the design, maintenance and use of premises, plant, substances, and equipment, to minimise risks to the environment, workers, and the public.
- Appoint competent contractors and consultants who can demonstrate high standards of safety, health, and environmental performance.

### Continuous Improvement

- Plan, monitor and review realistic and measurable objectives through the year. Report performance against these objectives openly.
- Learn from our own and others' good practice and errors.
- Discuss safety, health, and environment issues regularly at all levels and encourage the



development of new ideas to promote safety, health, and environmental protection.

- Monitor arrangements to ensure that all aspects of the system are suitable, sufficient, and complied with.

### **Legal Compliance**

- Ensure compliance with all legal obligations and any other systems or standards the UKAEA chooses to comply with.

### **People and the Environment**

- Provide healthy and safe workplaces with safe equipment and safe procedures of work.
- Commit to the prevention of pollution and the protection of the environment through responsible utilization of resources, particularly in relation to energy usage and management of waste.
- Create a safe, healthy, and environmentally responsible working culture.

### **Communication and Consultation**

- Consult and listen to both internal and external stakeholders on safety, health, and environmental protection arrangements, including safety representatives, contractors, customers, suppliers, neighbours, regulators, and workers generally.
- The UKAEA provides a system for reporting near-misses, incidents and personal injury and promotes a transparent and continual improvement culture.

### **Competency**

- Provide adequate resources, information, training, and supervision so the workforce can fulfil safety, health, and environmental responsibilities competently.

# Waste Management

The UKAEA is committed to reducing its environmental impacts through effective waste management and aims to divert at least 90% of controlled waste from landfill.

In order to meet our legal obligations and recycling aspirations, the UKAEA requires all staff, students, contractors, and visitors to comply with this Policy and the associated procedures on waste management.

## Expectations

### **The UKAEA will:**

- Remain compliant with all relevant waste legislation.
- Aim to reduce the amount of waste generated and the associated environmental impacts by applying the principles of the waste management hierarchy.
- Provide facilities to ensure the safe handling, effective segregation, and secure storage of waste on UKAEAs sites, with these aimed at maximising reuse and recycling opportunities.
- Set specific objectives and targets in relation to minimising waste, improving recycling rates and reducing disposal to landfill.
- Complete regular waste audits and monitoring in order to drive continual improvement.
- Provide appropriate training and induction for staff, contractors, and visitors around waste practices and site-specific requirements.

### **The UKAEA will demonstrate its commitment by:**

- Ensuring that all staff, students, contractors, and visitors are aware of their personal responsibility to make certain the waste they create is dealt with in accordance with this policy. Consideration must be given to applying the waste management hierarchy to all activities across all UKAEA sites:
  - Reduce: Only order/ purchase/ use the minimum amount of materials required.
  - Reuse: Retain materials which can be re-used onsite or by others.
  - Recycle: Segregate to maximise value of material for recycling.
  - Recover: Energy from waste will be recovered where facilities allow.
  - Dispose: As a last resort.
- Requiring all contractors removing waste to be registered with the Environment Agency (EA) to carry/ broker waste and that any proposed waste management site is licenced or has a letter of exemption issued by the EA.

- Preventing or minimising waste wherever possible and ensuring that it is stored, carried, processed, or disposed of in accordance with the principles of duty of care.
- Providing compliant and suitable waste storage containers and locations pending disposal. That waste is not stored in plant rooms, stairwells or any other location not intended for waste collection.
- Segregating waste to prevent contamination and mixing of materials to maximise the opportunity for recycling.
- Ensuring that waste and recycling removed from UKAEA sites is only transported by persons or service providers that are authorised to do so.
- Auditing the waste process, with regular reviews conducted throughout the year, external and internal auditors as part of local procedures and to meet ISO accreditation.
- Acting on the findings from audits to ensure legal and regulatory compliance and continually improve UKAEAs environmental impact and performance.

## **Legal Compliance**

Failure to comply with this policy could lead to environmental pollution and expose UKAEA to risk of regulatory noncompliance.

# Quality

The UKAEA will maintain and operate an effective and efficient management system, that satisfies the relevant standards and aims to ensure:

- It Identifies and meet the needs and expectations of its customers and all interested parties.

## Expectations

### **The UKAEA will do this by:**

- Striving to solve the challenges of sustainable fusion energy - from design through to decommissioning - with world-leading science and engineering.
- Drive UK economic growth and a thriving industry that exports fusion technology.
- Demonstrating strong leadership throughout the organisation by embedding responsibility for and understanding of quality and ensure the necessary resources are made available to deliver their objectives.
- Enable partners to design, deliver, and operate commercial fusion power plants by fostering a culture of teamwork and cooperation.
- Supporting everyone in their day-to-day work by developing clear, integrated business processes which are monitored and measured, with outputs that are evaluated against measurable objectives in support of this policy.
- Developing the skilled innovative people needed to deliver fusion.
- Promoting a positive commitment to quality and continual improvement.



# Risk Management

The UKAEA recognises that robust risk management is vital to achieving our mission and goals in line with the expectations of our stakeholders.

To ensure effective risk management the UKAEA shall establish, maintain, and continually improve an Enterprise Risk Management framework and process to support the identification and management of risks across the UKAEA, encouraging openness, challenge, innovation, and excellence embedding risk management to support decision making at all levels of the business.

## Expectations

**In alignment with HM Treasury's 'Orange book' and ISO31000 the UKAEA shall:**

- Ensure Risk Management and Assurance are essential components of governance and leadership, and fundamental to how the UKAEA is directed, managed, and controlled at all levels.
- Embed Risk Management and Assurance into core business activities and decision-making processes ensuring that our risk appetite, risk tolerance and risk capacity are within agreed limits.
- Encourage appropriately controlled risk taking where it has good potential to realise sustainable improvements in service delivery and value for money.
- Ensure authorities, responsibilities and accountabilities are clearly defined and understood.
- Provide adequate resources, tools, techniques, information, training, and support.
- Collaborate, communicate, consult, and ensure access to the best available information and expertise to support the management of risk and continual improvement.
- Employ timely, accurate and useful risk reporting to enhance the quality of decision-making and to support management and oversight bodies at all levels in meeting their responsibilities.
- Ensure robust Risk Management processes are established to include risk identification, assessment, evaluation and treatment, monitoring, assurance, and review.
- Ensure that identified risk treatment actions and controls are implemented and their effectiveness periodically reviewed.
- Utilise risk management software for capturing and managing all significant Corporate, Business as Usual, Project and Programme risks across all areas of the business ensuring an Enterprise Risk Management process is embedded throughout all levels of the UKAEA.
- Keep all risk information up to date to enable risk-based decision making ensuring that periodic reviews are conducted at agreed intervals.

- Deliver an Enterprise Risk Management Strategy to support continuous improvements to maturity, process, compliance, and culture.
- Make information clear to workers on how these expectations will be met.
- Enhance the interlink between Risk Management and Assurance processes to provide a comprehensive and robust approach to the three lines of defence in UKAEA.
- Provide assurance to senior leadership on key control effectiveness to allow for prioritisation of activity across the organisation.
- Support the organisation in the identification, development, and exploitation of key opportunities to enhance the ability of UKAEA to meet its strategic objectives.

# Business Resilience Management

Business resilience management, which includes business continuity, crisis management, emergency planning and security risk management supports research activities across the UKAEA. This is achieved through the vigorous commitment of everyone, including top management, to continual improvement.

The UKAEA shall ensure the security of workers, operations, property, and assets (including information assets). It will prepare for and mitigate risks to our activities, ensuring it is able to efficiently respond to and recover from harmful or disruptive events from whatever cause. The UKAEA will implement effective, tested plans and procedures to minimise harm to people, the environment, damage to property, damage or loss of confidentiality, integrity and availability of our information, financial impacts and damage to reputation following a harmful or disruptive event. The outcome will enable the UKAEA to respond to unplanned events and ensure critical activities continue during a period of disruption and to return our activities back to normal as soon as possible.

## Expectations

- Raise the profile of organisational resilience activities within the UKAEA, ensuring that workers are aware of Business Continuity Plans, Emergency Plans and Security Plans and associated policy and processes and their roles within them.
- Identify critical business activities of the UKAEA and reduce the risk of disruptive events from malicious, accidental, or natural sources to an acceptable level through business impact analysis on the potential events that can cause significant business disruption.
- Ensure that organisational resilience is considered and addressed through routine risk management processes and at the project design and planning stages, through business case development Plans, the project management processes and during the procurement process.
- Review and update annually or in light of any feedback or lessons identified involving business resilience activities including policy, processes, and plans for our current activities, and identifying future requirements to further develop these arrangements.
- Deliver a security awareness and education programme for workers as appropriate.
- Exercise, test, and review our arrangements on a regular basis to ensure they are fit for purpose and relevant.
- Deliver the statutory requirements laid down in the Cabinet Office's Functional standard 7-Security and associated minimum security standards.
- Protect information and property from inappropriate access, use or disclosure or unauthorised modification.



- Provide a secure working environment for all workers.
- Provide confidentiality, integrity and availability of information and information systems.
- Provide guidance on secure working practices for all workers when working on UKAEA business whilst off site both in the UK and abroad.
- Encourage the reporting of any actual or suspected business resilience matters such as security incidents via line management and the concern management system in a timely manner, enabling investigation and improvement.



# Business Responsibilities

**Ensuring UKAEA resources and information are readily available where needed, managed effectively and appropriately protected.**

## Business Practices

The UKAEA is committed to conducting its research, engineering design, enterprise, and other activities within a comprehensive ethical framework. It expects all those that undertake work on the UKAEA's behalf to demonstrate high standards of ethical and professional behaviour.

## Expectations

This policy shall primarily be applied to any activities that involve a third-party organisation such as:

- Fusion for Energy
- ITER Organisation
- Industry partners / collaborators
- Other commercial organisations
- Other government bodies



For the UKAEA's work on some specific contracts including the EPSRC fusion Grant, STEP, and for UKAEA Procurement, there are separate arrangements in place to manage business practices and while similar principles apply, they are outside the scope of this Policy.

### **Compliance with Law**

The UKAEA shall fully comply with all relevant national and international laws and regulations.

### **Reputation**

The UKAEA has an international reputation for scientific excellence, safety, and impartiality. UKAEA business activities will be conducted in such a manner as to protect and enhance the good reputation of the UKAEA. Hence actions or decisions will not be taken or be allowed to be taken if they will negatively impact the reputation of the UKAEA, our collaborators or customers.

### **Risk**

Any business activity invariably involves a level of risk. Risk management will begin at the earliest stage of commercial activity and continue through to final sign off. Care will be taken with contracts ensuring that terms and associated liabilities are understood (e. g. "Best efforts", "Reasonable efforts" or "Best reasonable efforts" differ in their implications). Care should also be taken with cost estimating to preserve desired margins. No-one shall enter into a contractual relationship either formally or informally without consultation and agreement from the Commercial, Financial and Procurement teams.

### **Business Development Process**

This process provides a framework to manage the creation of proposals, capture risks and ensure appropriate sign off is achieved in accordance with the Finance Manual. The proposals process is centrally managed by the Business Development Department (BD), who are suitably qualified.

Support and guidance will be provided throughout the proposal process. All proposals in scope of this document will be managed through BD to ensure we have an auditable approval record and appropriately archived originals. The Commercial team provides regular commercial awareness training; attendance is mandatory for workers involved in activities within scope.

### **Import and Export**

The UKAEA shall comply with UK import and export rules. The rules regarding trade with European partners has changed since the UK left the European Union. HMRC issues guidance on the latest requirements when importing and exporting goods. The UK Government's Department for Energy Security and Net Zero (DESNZ) issues guidance on the shipping of radioactive sources to and from EU countries.

Interactions with US organisations can be restricted by International Traffic in Arms Regulations (ITAR) which covers the export and temporary import of defence technologies and services. Any activity with an ITAR clause in the contract requires Board approval to proceed. Consultation with the Commercial team is required.



# People Policy

People bring the innovation and excellence needed to achieve our mission and keep pace with advances in fusion science and technology. The UKAEA will strive to be flexible and adaptable in our approach to our continually growing workforce, with a focus on delivery and innovation in how we operate our organisation.

## Expectations

We are committed to supporting and developing our people and fostering a culture where diversity in all its forms is valued, recognised, and celebrated. Our EDI vision is to be an employer of choice that attracts, retains, and develops people to their full capability because our reputation for valuing and celebrating all forms of diversity is widely acknowledged.

We are dedicated to maintaining a workplace free from all forms of discrimination, harassment, bullying and victimisation. Particularly where these behaviours are based on the nine protected characteristics defined in the Equality Act 2010 - age, disability, gender reassignment, pregnancy and maternity, marriage and civil partnership, sex, sexual orientation, race and religion or belief.

Irrespective of an individual's personal characteristics, the UKAEA shall not tolerate any behaviour which violates UK legislation, UKAEA's policies, and or which fails to treat people with dignity and respect.

Our capacity to deliver great science and engineering depends on our people.

### **The UKAEA shall:**

- Comply with all relevant legislation, policies, procedures, and any other relevant requirements.
- Clearly articulate our values, behavioural and performance expectations, incorporating these into our systems and practices and our interactions with government, industry, and stakeholders.
- Recognise and support behaviour and achievement that improves both organisational and industry performance and enhances the UKAEA's reputation.
- Treat our people with dignity, respect, and compassion, and promote healthy wellbeing within the workplace.
- Support flexibility, inclusiveness and diversity in our workforce ensuring that our people feel valued for their unique contributions.
- Build on the capability and excellence of our workforce through proactive recruitment and retention strategies, an emphasis on career and personal development; and
- Promote a positive working environment that engages and inspires all our people to achieve their full potential.
- Strive to be open, transparent, and inclusive, so that everyone we work with believes and values what we say and do.

# Communications

Relevant, transparent, accurate and timely internal and external communication is essential to the reputation and continued success of the UKAEA and delivery of its mission and goals.

## Expectations

- Develop and implement communications to align with UKAEA's mission and goals, ensuring they also align with Government priorities and key communications themes where applicable.
- Advocate internally and externally the importance of action in relation to one or more of the UKAEA's goals.
- Build on and/or maintain the reputation and perception of UKAEA and UKIFS brands to position the UK as a global leader in fusion energy development.
- Maintain good communications with stakeholders, providing timely, regular, and accurate information through authority-based information and consultation procedures.
- Collaborate with the external authorising stakeholders about partnerships or joint projects and agree on the content of messages and timings before dissemination.

### **Externally, the UKAEA shall:**

- Maintain and nurture key relationships with stakeholders locally, nationally, and internationally.
- Increase public interest in science. In particular, run education outreach activities to enthuse and inspire young people to pursue careers in science and engineering.
- Promote UKAEA through a wide variety of media outlets using appropriate messages aligned to our mission, goals, and values.
- Use social media responsibly to provide information about the UKAEA as well as the wider fusion community, whilst ensuring compliance with copyright law, GDPR and sensitivity surrounding the UKAEA's internal information.
- Promote the UKAEA at international and national industry and public events to support the UKAEA's mission and goals.
- Create and share its brand guidelines to ensure there is brand compliance.
- Ensure all marketing collateral produced accurately reflects the organisation and provides value for money.
- Evaluate and measure external communications activities including metrics such as geographic and audience reach, engagement, volume, sentiment, and messages.

**Internally, the UKAEA shall:**

- Keep workers up to date about UKAEA strategy, organisational developments, and news from the wider fusion community.
- Ensure communications are open and honest.
- Promote engagement with our workers through two-way communication, enabling workers to make their views heard.
- Provide and embed standards for good communications practice – most notably on messaging and branding.
- Provide easy access to essential, useful, and interesting information on the delivery of business requirements.
- Foster collaboration and information sharing between divisions.
- Tailor information and communication methods to meet the needs of the audience.



# Information Management

Information is key to the success of the United Kingdom Atomic Energy Authority (UKAEA). It is vital that we manage our information efficiently, consistently, and sustainably to ensure we deliver our goals and protect our reputation.

## Expectations

The Information Management Policy aims to ensure that information and information systems owned and entrusted to the organisation are suitable for business needs and meet legislative requirements. Further information can be found on the Information Assurance pages in Nucleus. The UKAEA's Policy provides commitment to the following principles.

### Information is a valued asset

- Information assets shall be identified, and their value assessed. These assets will be recorded in the Information Asset Register (IAR).
- Information is managed.
- Information assets will be stored, protected, preserved, and exploited in a manner commensurate with its value and compliance requirements.
- UKAEA information assets will be actively managed by Information Asset Owners (IAOs) and Local Information Managers (LIMs).
- Information is fit for purpose
- Information quality (accuracy, validity, reliability, timeliness, relevance, and completeness) will be appropriate for its purpose. It is the responsibility of IAOs and LIMs to ensure UKAEA information is fit for purpose.

### Information is standardised and linkable

- Information shall be maintained, follow open standards and corporate standards and where appropriate use common references that enable items to be structured, linked, integrated, and exchanged, as necessary.
- IAOs and LIMs will work with the Computing Division to make information assets standardised and linkable.

### Information is re-used

- The potential for internal and external re-use will be assessed case by case and where needed, mechanisms established.
- IAOs and LIMs will work with internal and external communications experts to maximise the re-use of information. Sharing of information shall always meet appropriate levels of Confidentiality, Integrity, and Availability (CIA).



## **Public information is published on request**

External Enquiries, Customer Complaints and Other Communications describes the UKAEA procedure for responding to Freedom of Information (FOI), Data Protection and other external requests.

Education to raise awareness shall be provided to workers and others as appropriate.



# Research Data Management

The UKAEA's goal to be a world leader of fusion research and development drives its commitment to the best research practices.

## Expectations

- Research data shall be managed to the highest standards throughout the research data lifecycle as part of the UKAEA's commitment to research excellence.
- Research and facility programmes should normally adopt Data Management Plans.
- UKRI-funded research data should be made freely available<sup>3</sup> for access and re-use, by publishing metadata<sup>4</sup> on the internet, with a statement on how to access the full data set.
- Before sharing research data, whether this is permissible shall be considered. Factors which can prevent this include Intellectual Property, commercial potential, ethical, privacy, confidentiality, legal and regulatory considerations.
- Research data shall be retained in an appropriate format. EPSRC policy specifies retention of data for at least 10 years from the date of the latest publication that uses them or the last time they are accessed, or access is requested, whichever is the later.
- For publications, the lead author is responsible for ensuring that research data management requirements are observed including individual elements such as figures, data tables, and mathematical derivations. Metadata relating to journal publications will be made available immediately after the paper is published.
- UKAEA research programmes will have procedures that ensure that data management requirements are observed.
- Researchers partly or totally funded by the UKAEA are expected to familiarise themselves with and act in accordance with this and other UKAEA policies relating to research practice. The UKAEA will provide advice, training, and support regarding research data management.

The UKAEA provides free and open access to preprints of its journal published papers, Annual Reports and Technical Reports publications via [UKAEA Scientific Publications - Browse Our Journals, Conference Papers and Reports.](#)

<sup>3</sup> When necessary to ensure the principle of "the right of the creators of research data to reasonable first use," some data may be embargoed for a reasonable period, no longer than three years.

<sup>4</sup> Metadata is the data description that serves to provide context or additional information about the underlying data; it must be sufficient to allow others to understand what research data exists and how it was generated in each instance.

# Background

## UKRI Data Policy

Whether the research is UKRI funded or not, the UKAEA abides by UKRI's data policy, [Open research – UKRI](#), and in particular the principles in the [Concordat on Open Research Data](#) that recognize that research data should wherever possible be made openly available for use by others in a manner consistent with relevant legal, ethical, disciplinary and regulatory frameworks and norms. EPSRC's expectations can be found at [Policy framework on research data – UKRI](#).

If organisations other than UKRI and its Research Councils fund or part-fund UKAEA research, or UKAEA workers are using data from facilities operated by other organisations, then their data management requirements shall be followed. However, UKAEA workers will apply the same or higher standards by as for UKRI-funded research.

## Definitions

The term 'Research Data' includes data on the operation of facilities and codes and comprises:

- a. 'raw' scientific data arising directly from experiments or from a modelling code.
- b. 'derived' data which has been subject to a form of standard or automated data analysis or reduction procedure.
- c. 'published' data, i.e. that data which is displayed or otherwise referred to in a publication and based on which the scientific conclusions are derived. Normally data will originate in digital form, but where this is not the case (e. g. algebra or lab books), and its retention is required, it should normally be converted to digital form by scanning.

When research data is generated by the UKAEA for a third party, for research by that party that does not involve the UKAEA, it is the responsibility of the third party to ensure that it manages the data consistent with the requirements of their funding organisations; this policy does not apply to such situations.

# Delegation of Authority

The UKAEA is committed to good corporate governance and strong accountability for decision making and management of resources, with due regard to propriety and value for money and for managing the risk of financial loss. A clear policy on the delegation of authority for decision making and the approval of expenditure is a key part of this commitment.

## Expectations

The UKAEA shall maintain, and regularly update, a framework of high-level financial delegation limits. Any delegation given to UKAEA workers will be compatible with these limits.

Delegations shall be made to workers with appropriate knowledge and skills and with due regard to appropriate segregation of duties. All workers with a financial delegation will ensure they fully understand their responsibilities and act with due regard to value for money, economy, effectiveness, and efficiency, complying with other UKAEA policies as appropriate. As a Non- Departmental Public Body, all workers should uphold the Nolan Principles in any decision making.

[www.gov.uk/government/publications/the-7-principles-of-public-life](http://www.gov.uk/government/publications/the-7-principles-of-public-life)

The UKAEA requires all Directors and Executive team members to ensure that this policy and the associated scheme of delegation are brought to the attention of all workers and applied within their areas of responsibility.

# Use of Company Assets

The UKAEA is committed to the responsible management of company assets in its mission for sustainable fusion energy. It acknowledges the privilege of receiving public money and is committed to using its resources carefully, focus on environmental sustainability, and with full accountability for investment decisions.

## Expectations

Company assets are to be used for legitimate UKAEA business purposes. All workers and those representing the UKAEA shall not use Company assets for personal gain or personal business, nor may they allow any other person, not employed, or authorised by the UKAEA, to use them.

# Estate Management

The UKAEA owns, develops, and operates land and buildings primarily in support of its own programmes of work and workers, but also to encourage wider economic benefit from the UKAEA's activities. Effective and efficient Estate Management is key to the provision of a safe, productive, and fit for purpose working environment for the delivery of world class research.

## Expectations

This policy aims to ensure that UKAEA land and buildings are subject to effective ownership, control, and responsibility to meet Government Estate policies and UKAEA business needs, wherever they are located, according to the following principles:

- UKAEA land and buildings are valuable assets which shall be managed appropriately to support and facilitate the delivery of the UKAEA's mission and goals.
- The UKAEA shall manage and maintain its assets in accordance with its asset management arrangements and Government Functional Standard 004.
- In accordance with our mission and goals the UKAEA will proactively work to attract commercial tenants from the science and technology sector to further develop the Culham Campus community.
- As custodian of land the UKAEA will ensure that land is managed to protect current and future needs, and to protect the environment.
- As owner of buildings the UKAEA shall maintain the buildings in line with legislative requirements, taking into account issues of safety, use, occupation, personnel requirements, and environmental impact.
- The UKAEA will provide professional and proactive Estates and Facilities Management.
- The UKAEA will provide end to end support for planning, designing, constructing, maintaining, and demolishing property assets at locations where the UKAEA conducts its operations.
- The UKAEA shall comply with Regulatory, Government and Department of Energy Security and Net Zero requirements regarding Estate Management matters.
- The UKAEA shall apply building design practices to deliver value for money, efficiency, and environmental sustainability in line with both the UKAEA Sustainability Strategy and in accordance with the Government Buying Standards for Sustainable Procurement.

# Intellectual Property Rights

The UKAEA recognises that Intellectual Property is a critical factor in the development and commercialisation of new sciences and technologies related to fusion. It is the UKAEA's approach to balance its IP policy with the goals of its mission.

This Policy establishes principles, rules and procedures for the management and commercialisation of intellectual property rights (IPR) resulting from intellectual property (IP) generated at the UKAEA. This applies to all types of new IP (including, without limitation, copyright in software and database rights).

## Expectations

### **The UKAEA will:**

- Protect, as appropriate, the IP arising from the public investment in the UKAEA so that this can be used primarily to enable the delivery of sustainable fusion energy.
- Facilitate innovation opportunities arising from the UKAEA's work - including non-fusion applications.
- Ensure the legal protection of the UKAEA's IP while at the same time adopting a balanced approach so as not to impede the traditions of disseminating scientific and technological knowledge in the field of fusion energy, academic freedom, and open and timely scholarly publications.
- Where IP arises that has commercial potential as a result of research, the UKAEA will make such IP available in a form that can most effectively promote its development – for fusion and other applications.
- This Policy maintains the well-established principle that the UKAEA owns all IP generated by creators whether at the UKAEA or elsewhere in the course of their employment or engagement with the UKAEA.
- The process of IP management is run by the Innovation Department with the Corporate Development Committee being the approval body for all IP and Commercialisation policy and strategy.

# Supply Chain Management

The UKAEA is dedicated to ensuring that its Supply Chain operates in accordance with UKAEA values. Suppliers will reflect UKAEA commitment to ethics, safety, sustainability, and use their resources in an accountable manner in meeting the organisations requirements.

## Expectations

### The UKAEA shall be an organisation that:

- Ensures all Supply Chain Management is conducted in accordance with Public Contract Regulations 2015 and is compliant with UK Government Security Policy <https://www.gov.uk/guidance/public-sector-procurement-policy> and delivered in line with industry best practice.
- Maximises value - defined as the best mix of quality and effectiveness for the least outlay over the period of use of the goods or services bought by effective management of the supply chain.
- Maximises efficient delivery of goods and services.
- Balances commercial risks and opportunities.
- Complies with all relevant legislation, regulations, codes of practice and other requirements applicable to management of the supply chain including with the Fraud Act 2006, Bribery Act 2010, and the Modern Slavery Act 2015.
- Ensures that the supply chain remains compliant, particularly, within health, safety, quality, and environmental requirements in accordance with [UKAEA Supply Chain Charter](#) and Procurement Policy Notes [06/21](#), [08/23](#) and [01/24](#).
- Ensures value for money, based upon lifetime cost concept and through appropriate use of competition in the supply chain; in line with UK Government Procurement Policy: [www.gov.uk/guidance/public-sector-procurement-policy](http://www.gov.uk/guidance/public-sector-procurement-policy).
- Delivers a programme of Supplier Relationship Management, working collaboratively with those key/strategic suppliers that are vital to our success, and maximise the potential value of those relationships.
- Drives a robust continuous improvement and learning culture that learns from internal and external experience, critically assesses our performance against high standards, and supports growth and development in line with Commercial Continuous Improvement Framework.
- Operates a transparent make-buy process to achieve the most cost-effective solutions.
- Ensures that all goods and services purchased conform to specified requirements at the point of use.



- Develops a capable and sustainable supply chain and which minimises barriers to entry.
- Deals with suppliers in a manner which is non-discriminatory; provides for equal treatment; is open and transparent; provides for mutual recognition and is proportionate to the nature and value of articles being procured.
- Supports Small and Medium-sized Enterprises, in line with UK Government SME Policy: [Small to medium sized enterprise \(SME\) action plan - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/policies/small-to-medium-sized-enterprises)
- Conducts procurement to pursue social, economic, and environmental objectives in line with Department for Energy Security and Net Zero Government Functional Standard (008) Commercial, Procurement Policy Note 06/20, Central Government's Social Value Model and UKAEA's Sustainability Strategy, to build a diverse, resilient, high performing supply chain to deliver exceptional value to the UKAEA, the economy and the communities we operate in.

# Code of Conduct

**The standards to which we hold ourselves as a responsible organisation acting with integrity.**

## Ethics

The UKAEA is committed to a working environment which operates with openness, accountability, and honesty, conducting its research, engineering design, enterprise, and other activities within a comprehensive ethical framework.

## Expectations

The UKAEA expects all workers conducting work in the name of or at the UKAEA to demonstrate high standards of ethical and professional behaviour. This extends to cover consultancy and enterprise activities.

The UKAEA will not tolerate any wrongdoing or impropriety at any time. The organisation will take the appropriate measures and act quickly where there are violations of this policy.

All workers and those representing the UKAEA are encouraged to report unethical behaviour to an appropriate senior manager or through the Whistle Blowing Policy.

# Application of the Human Rights Act

The UKAEA respects human rights and is committed to fulfilling its responsibilities in this area, mitigating any human rights impacts resulting from or caused by the UKAEA's activities.

## Expectations

The UKAEA is committed to managing its workers fairly and with inclusive and transparent policies.

# Whistle Blowing

All organisations face the risk of things going wrong or of unknowingly harbouring malpractice. The UKAEA takes malpractice very seriously and is committed to the highest standards of quality, honesty, openness, and accountability. As part of this commitment, the UKAEA encourages the workers or others at our sites with concerns about any aspect of our work to come forward and express them.

This policy does not form part of any contract of employment and the UKAEA may amend it at any time.

## Expectations

This policy applies to all employees, consultants, agency workers and other contractors of the UKAEA and to other workers within the UKAEA, including secondees, casual workers, volunteers, interns, and home workers (collectively “workers and others”).

The main purpose of this policy is to give workers and others the opportunity and protection they need to raise concerns internally. All workers and others have protection under whistleblowing laws if they raise concerns in the correct way. The procedure, Raising a Concern and Whistleblowing CD/P/G97, is designed to explain how to take that opportunity and receive that protection.

It does not matter if an individual who raises a concern is mistaken about it. Workers do not have to prove anything about the allegation they are making but they must reasonably believe that the disclosure is made in the public interest and that the information they have tends to show some malpractice.

Whistleblowing is where an individual has a concern about a danger, risk, malpractice, or illegality which has a public interest aspect to it and affects others. It is not a complaint, such as a grievance, that generally relates to an individual's own employment positions or personal

circumstances at work. The kinds of malpractice covered by this policy are explained more fully in the procedure.

The UKAEA encourages any suspected malpractice concerning the UKAEA to be reported as soon as possible, in the knowledge that such concerns will be taken seriously and investigated as appropriate, and that confidentiality will be respected wherever possible.

To support all workers and others in raising any concern, guidance covering the raising and handling of concerns (including whistleblowing) can be found in the whistleblowing procedure. The UKAEA is committed to the principles set out in this procedure. If any workers or others use this policy to raise a whistleblowing concern in accordance with procedure, the UKAEA gives them its assurance that they will not suffer any form of detrimental treatment by doing so. The UKAEA will treat all concerns raised seriously and will act according to the procedure.

The individual with whom the whistleblowing concern is raised is responsible for ensuring that it is dealt with in accordance with the whistleblowing procedure.

Whistleblowing concerns shall be raised by email to: [whistleblowing@ukaea.uk](mailto:whistleblowing@ukaea.uk).

# Declaration of Outside Interest

The UKAEA is committed to demonstrating high standards of honesty, impartiality, and integrity in order to comply with [The Seven Principles of Public Life - GOV.UK \(www.gov.uk\)](https://www.gov.uk). The role that workers play in ensuring transparency and protecting UKAEA's reputation is key.

## Expectations

All workers and those representing UKAEA are expected to comply with the highest standards of professional and ethical practice and are required to declare any interests which may conflict or may be perceived to conflict with UKAEA's business.

All workers have a duty to avoid business, financial or other direct or indirect interests or relationships which conflict with the interests of the UKAEA. Any activity which appears to present such a conflict will be avoided or terminated unless, it is confirmed in writing that the activity does not constitute a conflict of interest and is not detrimental to the reputation and standing of the UKAEA.

All perceived conflicts of interest shall be reported to the conflicts of interest email address: [registerofinterest@ukaea.uk](mailto:registerofinterest@ukaea.uk) (or using the equivalent UKIFS reporting mechanism), and these should be reported as soon as possible. All Board members and senior management of the UKAEA are required to complete a 'Declaration of Interest' form annually.

This policy should be read in conjunction with the Declaration and Management of Outside Interests procedure and guidance to ensure workers are fully aware of the considerations and requirements relevant to their role.

# Gifts and Hospitality

The UKAEA values its relationships with collaborators and partners and shall only accept Gifts and Hospitality of minor value and in an open and transparent manner. Improper or excessive Gifts and Hospitality can expose UKAEA and its workers to the risks of fraud, corruption, bribery, and reputational damage.

## Expectations

All workers and those representing the UKAEA, or any member of their immediate family should not accept gifts, money, or entertainment from third party organisations or individuals where these can reasonably be considered likely to influence business transactions, unless:

- They are of a very minor nature usually associated with accepted business practice.
- They will not interfere with your independence of judgement or action in the performance of your employment.

All gifts or hospitality received shall be reported to the appropriate line management and to the gifts and hospitality email address: [giftsandhospitality@ukaea.uk](mailto:giftsandhospitality@ukaea.uk).

All gifts or hospitality offered shall be of low value and must be specifically approved in advance by the appropriate line management and reported to the gifts and hospitality email address: [giftsandhospitality@ukaea.uk](mailto:giftsandhospitality@ukaea.uk).

Refer to the Finance Manual Entertainment, Gifts and Hospitality and the Gifts and Hospitality Procedure.

# Political Involvement and Contributions

The UKAEA is a non-departmental public body of the United Kingdom government. It is committed to the delivery of sustainable fusion energy, maximising the scientific and economic benefit for the UK and all peoples who can be affected by its work.

## Expectations

The UKAEA does not make contributions to political parties, political candidates, or organisations whose activities are designed to promote the interests of political parties or political ideologies.



# Good Research Practice and Scientific Misconduct

The UKAEA seeks to achieve the highest standards regarding good research practice, research ethics and the handling of potential scientific misconduct.

## Expectations

The UKAEA has adopted the principles in UKRI policy on the governance of good research practice (GRP) – UKRI. All UKAEA workers involved in science and engineering research are expected to have read and to abide by this document. The Policy and Guidelines cover setting standards for good research practice, what is unacceptable research conduct, reporting and investigating allegations of research misconduct, and the responsibilities of the Research Councils and Research Organisations in fostering and safeguarding the highest possible standards of research conduct.

The UKAEA's system of internal refereeing of papers, presentations, posters and reports via <https://pinboard.ukaea.uk/> in accordance with the Conditions of Employment Manual ("in no circumstances may copies of proposed publications be sent to publishers before approval is given") provides a further safeguard that helps to ensure high standards.

If a worker believes that they are being required to act in breach of these principles, or has a concern about the conduct of others, they should raise the matter through their line management or, where appropriate, directly with the UKAEA Chief Scientist. The right of appeal shall be to the UKAEA Chief Executive Officer. These arrangements are consistent with the UKAEA's wider policy on Whistle Blowing.

Any worker involved in research not funded by Research Councils, shall be expected to comply with the spirit of UKRI's policy and code of conduct, and with any requirements specifically notified to the UKAEA by the funding agency or external recipients of the work. They will also comply with UKAEA's Policy on Research Data Publication.

In establishing collaborations, the UKAEA researchers shall be mindful of UKRI's policy and guidelines and ensure that research partners and their employing institutions are able to meet the required standards of research conduct.

# Counter Fraud

Where fraud is mentioned, it should be taken to mean fraud, corruption, bribery, and cybercrime.

The UKAEA is committed to establishing and applying appropriate standards of regularity and propriety and expects all workers, at all times, to act honestly and with integrity and to safeguard the public resources for which they are responsible. Everyone who conducts work on behalf of the UKAEA has a duty to familiarise themselves with the types of improprieties which can occur within their areas of responsibility and to be alert to any indications of malpractice.

This policy applies to any suspected fraud or irregularity involving workers and/or any other parties having a business relationship with the UKAEA. It is based on the UKAEA's own principles and states the UKAEA's approach and response to acts of fraud.

All UKAEA workers, being public servants and in accordance with their Conditions of Employment (CEM), operate under a code of conduct. They have a financial duty to use public money responsibly as detailed in the publication Managing Public Money.

## Expectations

The UKAEA shall not condone any form of fraud and it is important in this context that we are able to withstand both internal and external scrutiny. Where fraud is alleged, the UKAEA is committed to investigating the allegations, recover any losses and taking appropriate actions against any perpetrators.

All workers will familiarise themselves with the Conditions of Employment Manual.

### **The UKAEA will:**

- Operate a zero-tolerance approach to any level of fraud.
- Thoroughly investigate all cases of suspected fraud and deal with all appropriately.
- Inform the Police of all frauds or misappropriations where materiality and/or other reasons make it necessary.
- Conduct any investigative activity without regard to any person's relationship to the UKAEA, their position or length of service.
- Take disciplinary action and/or criminal proceedings whenever and wherever fraud or malpractice is identified.
- Treat all individuals who raise a concern in respect to suspected fraud with respect.

The UKAEA encourages and supports a fully open and honest working environment and believes in a proactive and reactive approach to the detection and prevention of fraud. It recognises that the primary responsibility for this rests with management. It is, however, essential that all workers report any suspicions and or irregularities to their line manager initially (whenever possible) and the line manager will refer the matter through the organisation, eventually leading to the Counter Fraud Champion. The responsibilities are defined in accordance with the Government Functional Standard 013 – Counter Fraud.

# Commitment to export control compliance

It is the policy of the UKAEA to comply in all respects with the UK export control regulations, as well as those of any other jurisdiction applicable to our business.

The success of our organisation depends, in part, on the business we do with customers overseas. Export controls enacted by the UK Government affect an important part of the technical information ("technology") and goods that the UKAEA may export and the consequences of breaching these controls are serious.

The purpose of controls on exports is to restrict the supply of strategic goods and/or technology to certain countries deemed to be high risk, principally for the avoidance of arms proliferation, terrorism, human rights abuses and additionally to promote global security.

## Expectations

### **The UKAEA shall be an organisation that:**

- Employees and ASW's of the UKAEA shall be aware of and understand these controls, the methods of enforcement, and be certain that we practice full compliance. It is essential that we comply with the appropriate regulations as failure to do so may bring serious penalties for the company and for any individuals concerned.
- Each worker shall be aware of their own role and ensure that no goods or technology are despatched without compliant authorisation. The UKAEA Chief Financial Officer (CFO) has overall responsibility for the maintenance of and adherence to these procedures.
- Training shall be available to all workers, including for new starters. Refresher training will also be available.
- Workers directly concerned with the operation of these controls and procedures shall receive detailed training, which will include attendance at various Export Control Seminars organised by the Department for International Trade (DIT) or other providers.
- If any employee considers that an action being taken or contemplated by the company can lead us to be in breach of any export control regulations, then they shall report the matter immediately to either their supervisor/manager or to the CFO. The Department of
- International Trade ('DIT') has the legal authority to revoke open licences in the event of non-compliance with licence conditions, in addition to reporting any suspected breaches to HM Revenue & Customs.
- Recognises that every worker has an important role in respect of our export control compliance strategy, and it is therefore vital that all procedures relating to export control are fully complied with to ensure the continued success of the UKAEA.

Further information can be found on Nucleus: Import/Export of Dual Use Goods and Technology.

# Document Changes

Issue No.	Date	Section	Changes
5	Sep 2024	Introduction	Updated first paragraph to align with goals and objectives. Footnotes added to clarify application to UKAEA Group.
		Health, Safety and Environment	Complete Review.
		Waste	Removed statement of intent to Convene Waste Committee.
		Quality	Entire Policy update to make more succinct, language aligned with goals & objectives.
		Risk Management	Risk Management: Updated language to align with current usage. Added last 3 bullet points.
		Business Resilience Management	Added reference to crisis management. Changed references to 'UKAEA Group' to align with this Manual.
		Business Practices	No changes.
		People	No changes.
		Communications	Communications: Removed funding body information from opening paragraph. Changed DESNZ to Government.
		Information Management	No changes.
		Research Data Management	No changes.
		Delegation of Authority	No changes.
		Use of Company Assets	No changes.
		Estate Management	No changes.
		Intellectual Property Rights	No changes.
		Supply Chain Management	Added reference to Fraud Act 2006. Added references to Supply Chain Charter & Procurement Policy Notes. Added reference to Continuous Improvement Framework. Removed reference to DESNZ. Updated hyperlink to SME Action plan. Added references to Procurement Policy Notes, Gov Social Value Model and UKAEA sustainability strategy. Updated 10 <sup>th</sup> bullet point to reflect current practice.
		Ethics	No changes.
		Application of Human Rights	No changes.
		Whistle Blowing	Minor rewording to remove repeated links.
		Declaration of Outside Interest	No changes.
		Gifts and Hospitality	No changes.
		Political Involvement and Contributions	No changes.
		Good Research Practice and Scientific Misconduct	No changes.
Counter Fraud	No changes.		
Commitment to export control compliance	No changes.		
Changes Table	Updated changes table to include policy author.		

<b>Issue No.</b>	<b>Date</b>	<b>Section</b>	<b>Changes</b>
4	Oct 2023	Whole Document	Updated section titles and reordered content throughout.
		Introduction	New Opening Statement. Added requirement to declare and report outside interest. Added reference to supporting documentation.
		Safety, Health, and Environment	No changes.
		Waste Policy	New Policy.
		Quality	Minor word changes.
		Risk Management	Update to language linking Assurance to the business. Added three new bullet points.
		Business Resilience Management	Updated language referencing UKAEA Group.
		Business Practices	Risk section updated with duty of care regarding cost. Import & Export, replaced BEIS with DESNZ.
		People Policy	Change of date for Equality Act.
		Communications	Updated scope of policy coverage.
		Information Management	Computing Division.
		Research Data Management	No changes.
		Delegation of Authority	No changes.
		Use of Company Assets	No changes.
		Estate Management Policy	Updated language referencing internal & external bodies.
		Intellectual Property Rights (IPR)	Replaced bullet point re BDIC with latest organisation information.
		Supply Chain Management	Updated general language. Updated .gov link to SME. Changed reference to BEIS and added reference to Government Functional Standards.
		Ethics	No changes.
		Application of Human Rights	No changes.
		Whistle Blowing	Updated links to Whistleblowing Procedure.
		Declaration of Outside Interest	Changed title to "Declaration of Outside Interest".
		Gifts and Hospitality	First paragraph clarified risk of exposer and impact. Updated email address. Removed paragraph on financial gifts & hospitality. Added paragraph on low value gifts & hospitality.
		Political Involvement and Contributions	No changes.
Good Research Practice and Scientific Misconduct	No changes.		
Counter Fraud	Changed Head of Financial Accounts to Financial Controller.		
Commitment to export control compliance	No changes.		



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