



UK Atomic
Energy
Authority

UKAEA Group Policy Manual

CD/MAN/25 Issue 7

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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) strives to deliver our mission and strategic goals through our people. The leadership is committed to a Safety First, Quality Always culture that protects our people, the environment and all who may be affected by our activities.

Important notes:

Key to our Safety First, Quality Always 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 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. 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.

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.

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

Purpose & Scope

This manual contains the UKAEA policies which are regularly reviewed by the Group Executive Committee. This manual applies to UKAEA Group and its wholly owned subsidiaries. UKAEA policies form part of the framework¹ 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.

People Statement

The People Policy Framework governs employment related policies for UKAEA, which includes contractual Conditions of Employment Manual clauses, and other related non-contractual Policies that concern employment. It sets out the principles for developing, agreeing, maintaining and reviewing People related policies. A full list of policies can be found within the Framework.

¹ '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.



Safety, Health, and Environment

At UKAEA, the safety and health of our people, along with the protection of the environment, are fundamental core values. We uphold these values through a strong and shared commitment to the continual improvement of our management systems. We believe that nothing is so important that it can't be done safely.

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

UKAEA is committed to minimising risk by ensuring a safe working environment, providing safe equipment, and implementing safe, environmentally responsible and sustainable working practices. We will provide training, instruction, guidance, and leadership to empower every colleague to actively champion safety and environmental protection, ensuring they feel fully supported in creating a safe and healthy workplace at UKAEA.

Responsibilities for Health, Safety and Environment



Key Responsibilities and Accountabilities

Chief Executive Officer	• Demonstrate visible leadership and promote UKAEA's commitment to safety, health, and the environment • Ensure that adequate resources are available to meet UKAEA's commitments to safety, health, and the environment • Monitor UKAEA's progress against safety, health, and environmental key performance indicators
Directors/Unit Heads	• Lead by example promoting responsible attitudes and behaviours • Ensure risks and concerns are effectively addressed • Monitor performance and lead continuous improvement
Group Leaders	• Ensure safe working, lead by example, and promote safe attitudes/behaviours • Ensure that procedures are followed • Ensure that workplaces are safe for colleagues and visitors
All Workers	• Follow our 5 Golden Rules • Be a PAL • Follow all training and don't take short cuts
QSHERA Directorate	• Develop policy, strategy, and standards • Advise, guide, and support the UKAEA organisation • Monitor performance and support leaders to drive continuous improvement

Expectations

In order to uphold our commitments to safety, health, environment and sustainability, UKAEA will:

Leadership and Culture

- Demonstrate strong leadership in protecting the safety, health, and wellbeing of our employees, contractors, and anyone impacted by our activities.
- Commit to preventing pollution, lowering our carbon footprint, and enhancing biodiversity as part of our environmental responsibility.
- Integrate environmental sustainability into procurement decisions, service delivery, and project planning.
- Foster a positive culture of health, safety, and environmental awareness, promoting informed risk perception and responsible behaviours at all levels of the organisation.

Management of Operational Risk

- Maintain and implement robust controls for the design, operation, and maintenance of premises, plant, equipment, and substances to minimise risks to people and the environment.
- Engage competent contractors and consultants who demonstrate consistently high standards in safety, health, and environmental performance.

Continuous Improvement

- Set realistic, measurable objectives for safety, health, and environmental performance, and regularly plan, monitor, and review progress. Performance against these objectives will be reported transparently.
- Actively learn from both internal and external experiences—embracing good practices and understanding the causes of errors to drive improvement.
- Encourage open dialogue on safety, health, and environmental matters at all levels of the organisation, fostering innovation and new ideas to strengthen our culture of protection.
- Continuously monitor our systems and arrangements to ensure they remain suitable, effective, and consistently followed.

Legal Compliance

- Ensure compliance with all applicable legal requirements, as well as any additional standards or systems that UKAEA voluntarily adopts.

People and the Environment

- Provide safe and healthy workplaces, supported by well-maintained equipment and clearly defined safe working procedures.
- Prevent pollution and protect the environment through responsible resource use, with a focus on energy efficiency and effective waste management.
- Foster a working culture that prioritises health, safety, and environmental responsibility at every level.

Communication and Consultation

- Actively consult and engage with both internal and external stakeholders—including safety representatives, contractors, customers, suppliers, neighbours, regulators, and all workers—on matters related to safety, health, and environmental protection.
- Maintain a clear and accessible system for reporting near-misses, incidents, and injuries, supporting a transparent culture of continual improvement.

Competency

- Provide sufficient resources, clear information, appropriate training, and effective supervision to ensure all members of the workforce can competently meet their safety, health, and environmental responsibilities.

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 meets 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.
- Enabling 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.
- Accelerating innovation through the promotion of a positive Quality culture and a commitment to continual improvement.



Business Resilience Management

Business resilience management includes business continuity, crisis management, emergency preparedness & response and all facets of security risk management, supporting 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 and assets 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.



Security Culture

The UKAEA recognises the need for a positive, inclusive security culture to enable us to achieve our mission and goals.

We aim to create a bespoke enhanced security posture designed to protect our people, IP, assets, and our reputation, as well as those of the organisations the UKAEA interacts with. This culture is characterised by:

Awareness and Education: Workers are well-informed about the security policy, associated procedures, cyber awareness, and the importance of safeguarding information. Regular updates are provided to keep everyone knowledgeable about the latest security threats and best practices.

Shared Responsibility: Security is viewed as a collective responsibility. Everyone at the UKAEA is expected to be accountable for maintaining an enhanced security posture and understands their role in preventing security breaches.

Leadership Commitment: UKAEA's leaders demonstrate a strong commitment to security by modelling best practice, allocating resources, and integrating security into strategic planning and decision-making processes.

Open Communication: There is an open and transparent line of communication regarding security related matters. The UKAEA fosters a culture to promote a psychologically safe environment to report potential security issues and incidents.

Proactive Measures: The UKAEA takes proactive steps to identify and mitigate risks before they become significant issues. This includes regular security audits, risk assessments, and the implementation of proportionate security technologies and protocols:

- Governance enhancement via the UKAEA Group ExCo Security Sub-committee (SSC).
- A Baseline Security Framework mapped to the compliance of HM Government security standards.
- Utilisation of the NPSA Trusted Research and Innovation (TR&I) and Secure Innovation advice and guidance to form a mature approach to research security.
- Adoption of the Government Security Profession Career Framework to ensure our workers' skills, knowledge and qualifications are developed.

Continuous Improvement: Security practices are continuously evaluated and improved, by harnessing best practice from multiple external stakeholders (other ALBs, colleagues from DESNZ and the Government Security function).

The UKAEA will seek feedback and monitor progress of the continual development of its security culture.

The UKAEA is agile, adapting to new threats and incorporating lessons learned from past incidents.

Behavioural Consistency: Workers consistently follow security policies and procedures, demonstrating a high level of vigilance and care in their daily activities. Security is ingrained in the UKAEA's ethos, influencing every action and decision.

Collaboration and Support: Security is integrated into all organisational processes and functions. Cross-organisational collaboration ensures that security measures are comprehensive and effective.

Incident Response Preparedness: The UKAEA has well-defined site emergency and security plans that are regularly tested and refined. Workers are aware of their roles in the event of a security incident, ensuring a swift and effective response.

Ethical Considerations: Our security culture is underpinned by strong ethical principles, emphasising the protection of the privacy and rights of individuals as well as UKAEA's IP and assets.

By fostering its security culture, UKAEA ensures that security is not just a compliance requirement but a fundamental aspect of its operational philosophy, driving resilience and values of trust, collaboration, commitment, and innovation, as well as supporting the successful delivery of its goals.

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.



Commitment to Export Control

It is the policy of UKAEA to comply in all respects with the UK export control regulations as detailed in the Export Control Act 2002 and Export Control Order 2008, 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 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

- Employees and Contingent Labour of 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 recognise their important part in respect to our export control compliance strategy 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.
- Information, Instruction and Training shall be available to all workers, including for new starters. New starters will receive the Export Control Awareness eLearning course leading to the Export Control Awareness Training if required. 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 Transport Team for onward reporting to the CFO.
- Export Control Joint Unit (ECJU) have the legal authority to revoke open and specific licences in the event of non-compliance with licence conditions, in addition to reporting any suspected breaches to HM Revenue & Customs.

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.

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

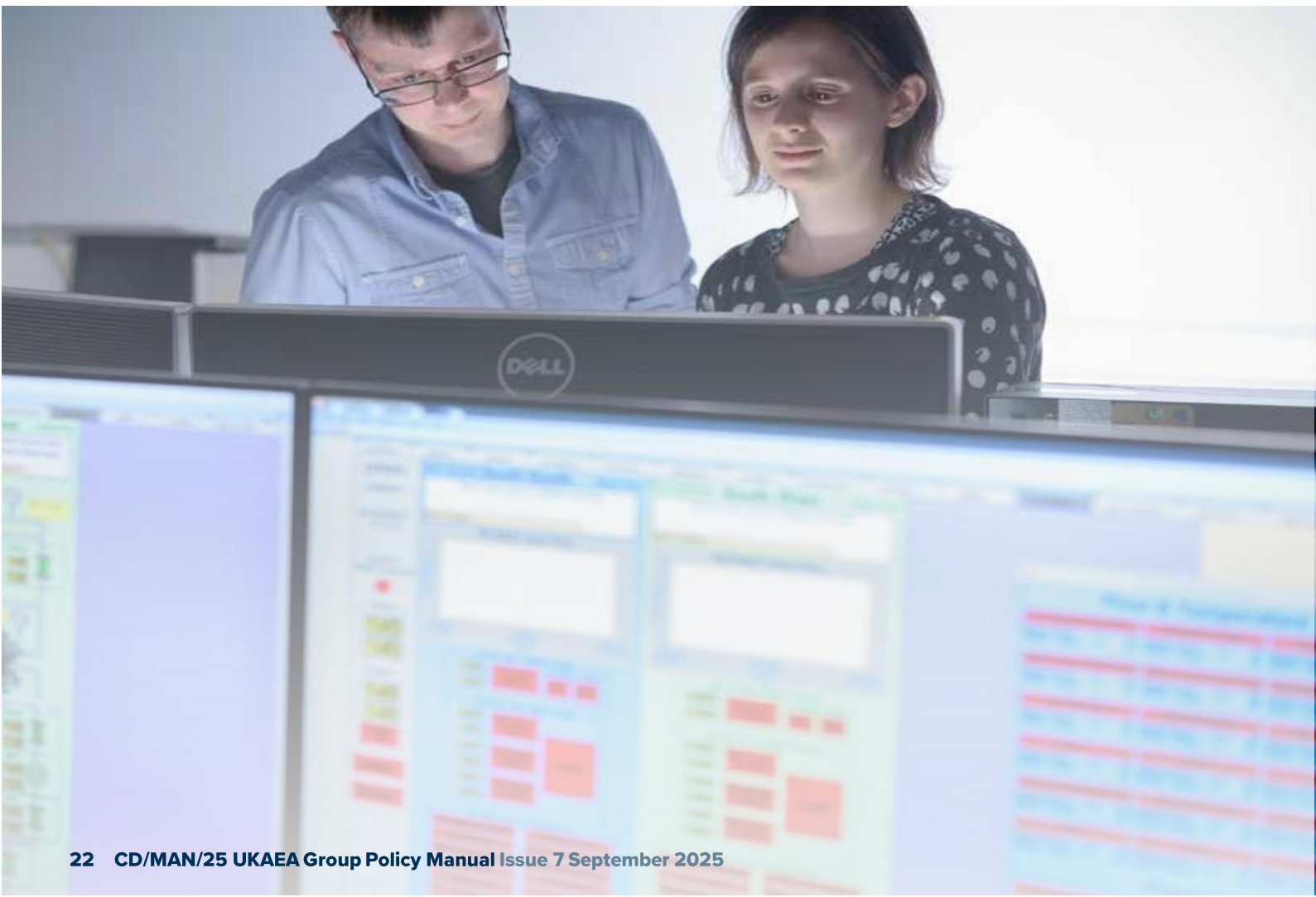
This process provides a framework to manage the creation of proposals, capture risks and ensure appropriate sign off is achieved in accordance with the Finance Manual. The proposals process is centrally managed by the Business Development Department (BD), who are suitably qualified.

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.



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/government/publications/the-seven-principles-of-public-life). 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 (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.

Any offers of gifts or hospitality which are not minor in nature must be specifically approved in advance by the appropriate line management and reported to the gifts and hospitality email address: giftsandhospitality@ukaea.uk.

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

Refer to the Finance Manual 'Entertainment section Gifts and Hospitality' and the Gifts and Hospitality Procedure.

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 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.

Travel

UKAEA is committed to good corporate governance and strong accountability to ensure it upholds the principles of Managing Public Money. The policy and associated arrangements outline provisions for business-related travel. This policy aims to ensure the health, safety and well-being of our workforce.

UKAEA contracts with a number of corporate travel providers for a range of services which should be used in the first instance. All travel approvals, bookings and expense claims must be made via U4BW for the purposes of transparency and traceability. Further processes, procedures and guidance are available to assist travellers to consider if the trip is necessary and if so, travel arrangements should consider the following key factors:

- Security
- Business need
- Environmental impact and sustainability
- Cost as a public funded organisation

Workers should be aware that from time-to-time UKAEA may be required to disclose information on travel bookings, subsistence costs and expense claims and at all times should comply with HMT's tax requirements with due regard to propriety and value for money and for managing the risk of financial loss.

Failure to follow UKAEA's travel arrangements may result in delayed or denied reimbursement as well as disciplinary action which may include termination of employment.

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. Workers may directly contact the UKAEA Chief Scientist or the UKIFS Director of Science and Technology as appropriate. The right of appeal will be held with the UKAEA Chief Executive Officer or the UKIFS Chief Executive Officer respectively. These arrangements are consistent with the 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.

Information Management

Information is a vital asset for the UKAEA. Effective, consistent, and sustainable management of information is essential to delivering our strategic goals, ensuring legal compliance, supporting informed decision-making, and protecting our organisational reputation.

Purpose

This policy establishes the overarching principles for managing information and information systems owned by, or entrusted to, the UKAEA. It supports compliance with relevant legislation and government policies and underpins the responsible stewardship of information across all functions.

Expectations

The UKAEA is committed to the following core information management principles:

Information is a Valued Asset

- All information assets shall be identified and recorded in the **Information Asset Register (IAR)**.
- Each asset's value and sensitivity will be assessed to ensure appropriate management and protection.

Information is Actively Managed

- Information assets will be stored, protected, preserved, and utilised according to their value, risk, and regulatory obligations.
- Designated Information Asset Owners (IAOs) and Local Information Managers (LIMs) are responsible for overseeing asset lifecycle management.

Information is Fit for Purpose

- Information must be accurate, timely, reliable, relevant, valid, and complete.
- IAOs and LIMs are accountable for ensuring the quality and appropriateness of the information under their control.

Information is Standardised and Linkable

- Wherever appropriate and without compromising confidentiality, security, or intellectual property rights, information shall be managed using open technical standards and corporate data standards.²
- Wherever feasible, common reference data should be used to structure, integrate, and link information assets for effective use and exchange.
- IAOs and LIMs will collaborate with the Computing Division to enable this standardisation.

Information is Re-usable

- The potential for internal and external information re-use shall be considered, with appropriate sharing mechanisms established where beneficial.
- Information sharing will always comply with Confidentiality, Integrity, and Availability (CIA) requirements.

² "Open technical standards" refers to the use of interoperable, non-proprietary technical formats and protocols. It does not imply public disclosure of information subject to intellectual property, confidentiality, or security restrictions.

- IAOs and LIMs will work with internal and external communications experts to promote responsible information re-use.

Public Information is Published on Request

- The External Enquiries, Customer Complaints and Other Communications procedure outlines how the UKAEA responds to requests under the Freedom of Information Act (FOIA), Data Protection legislation, and other statutory obligations.
- Relevant information will be disclosed transparently and in accordance with legal and policy requirements.

Education and Awareness

- Information management training and awareness will be provided to all relevant personnel to embed good practices and promote a culture of information responsibility.

Governance and Compliance

- Compliance with this policy is mandatory for all UKAEA personnel, contractors, and partners handling information. Adherence will be monitored through assurance activities, audits, and internal reviews.



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 for access and re-use, by publishing metadata 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.

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](#).

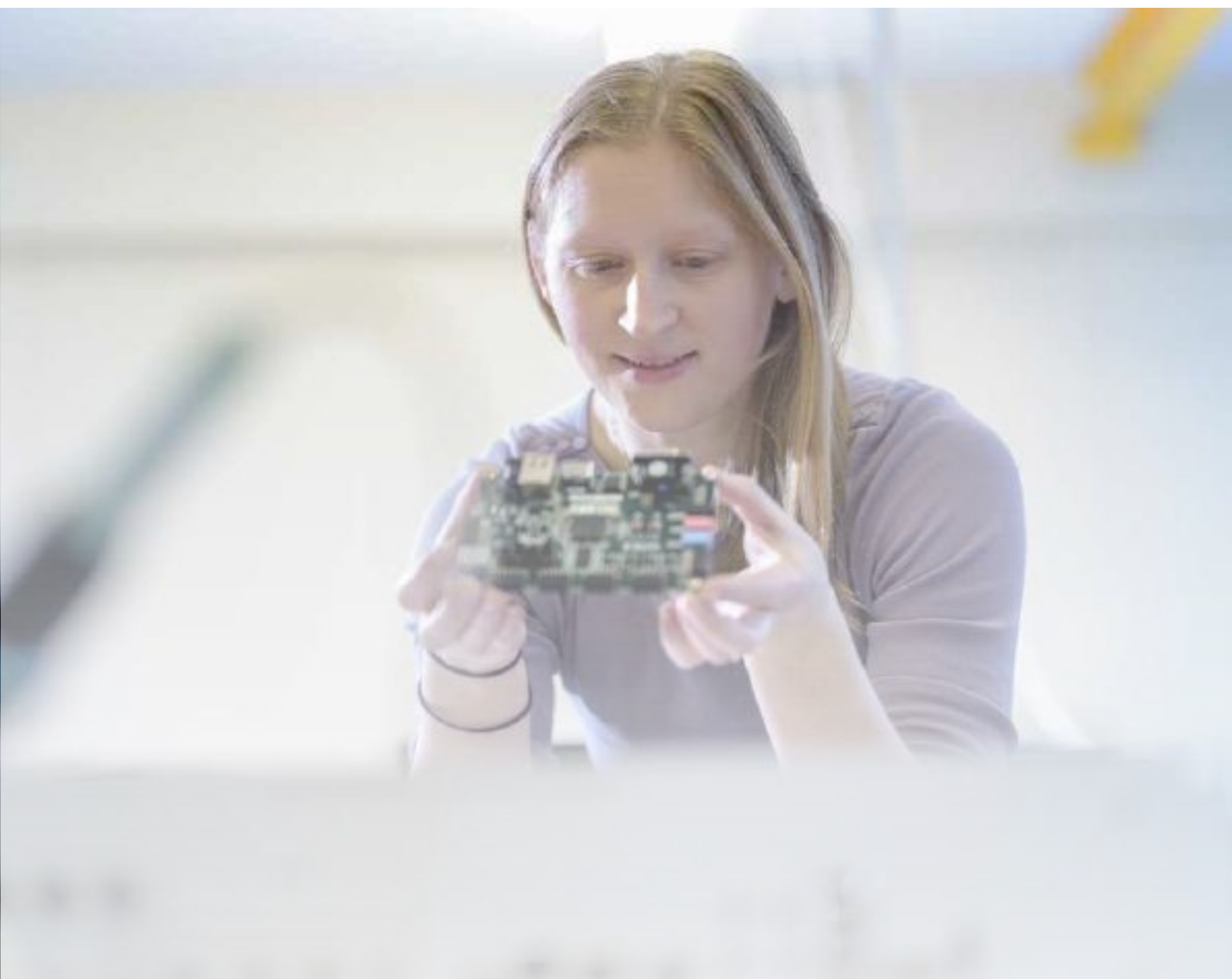
If organisations other than UKRI and its Research Councils fund or part-fund UKAEA research, or UKAEA workers are using data from facilities operated by other organisations, then their data management requirements shall be followed. However, UKAEA workers will apply the same or higher standards by as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



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

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, via the media team, through a wide variety of news 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.



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 to meet 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 develop the opportunity in a form that can most effectively promote its impact – 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 and approvals is managed by the respective IP Teams.

Managing Public Money

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

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.

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.

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

- Ensures all Supply Chain Management is conducted in accordance with Procurement Act 23 and is compliant with UK Public Sector Procurement Policy and delivered in line with transforming public procurement and [industry best practice](#).
- Delivers value for money and economic growth based upon lifetime cost concept and through appropriate use of competition in the supply chain; in line with the National Procurement Policy Statement: [National Procurement Policy Statement - GOV.UK](#).
- Demonstrates transparency throughout the procurement lifecycle via regular market engagement, timely notices and reporting of key performance indicators.
- Balances commercial risks and opportunities throughout the contract.
- Complies with all relevant legislation, regulations, codes of practice and other requirements applicable to management of the supply chain including 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 (PPN) [006](#), [011](#), and [016](#).
- 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 in line with Commercial Continuous Improvement Framework and [Government Functional Standards \(GovS 008\)](#).
- Ensures that all goods and services purchased conform to specified requirements at the point of use.
- Deals with suppliers in a manner that is non-discriminatory; provides for equal treatment; is open and transparent; provides for mutual recognition which 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 \(www.gov.uk\)](#) and UKAEA's internal SME Engagement Plan.
- Conducts procurement to pursue social, economic, and environmental objectives in line with Department for Energy Security and Net Zero priorities, [PPN 002](#), [PPN 009](#), Central Government's Social Value Model, UKAEA's [Social Value Charter](#) 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.
- Fully supports UK Government policy, standards and guidance regarding tackling security risk in government supply chains <https://www.security.gov.uk/policy-and-guidance/tackling-security-risk-in-government-supply-chains/>.

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 UKAEA sites.
- 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, considering 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 for 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.

Document Changes

Issue No.	Date	Section	Changes
7	Aug 2025	Introduction	Rewording of opening statement.
		Health, Safety and Environment	Complete rewrite.
		Waste	No changes.
		People	Replaced with People & Culture Policy Statement.
		Quality	Minor rewording on continual improvement statement.
		Business Resilience	Minor rewording on planning statements.
		Security	No changes.
		Risk Management	No changes.
		Commitment to export control compliance	Complete rewrite.
		Business Practices	No changes.
		Declaration of Outside Interest	No changes.
		Gifts and Hospitality	Minor restructure, no content changes.
		Travel	New Addition
		Good Research Practice and Scientific Misconduct	Inclusion of UKIFS when raising a concern.
		Information Management	Complete rewrite.
		Research Data Management	No changes.
		Communications	Updated Media Team involvement when working with external news outlets.
		Intellectual Property Rights	Minor rewording of opening statement Update to text of IP process management and approval.
		Delegation of Authority	No changes.
		Counter Fraud	No changes.
		Supply Chain Management	Complete rewrite.
		Estate Management	Minor rewording of legislative requirements statement.
		Whistle Blowing	No changes.
		Changes Table	No changes
		Use of Company Assets	Replaced with People & Culture Policy Statement.
		Ethics	Replaced with People & Culture Policy Statement.
		Application of Human Rights	Replaced with People & Culture Policy Statement.
6	Jul 2025	Political Involvement and Contributions	Replaced with People & Culture Policy Statement.
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.

Issue No.	Date	Section	Changes
		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 th 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.

Find out more
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