

Security Compliance for Sub-Contractors

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Document Type: Guideline

Change Details

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1. Purpose

To define Security Compliance for Sub-Contractors guideline to provide the user with guidance for following the Security Vetting Clearance procedure.

2. Scope

Relevant to Supply Chain and applicable to KBS Maritime Business Management.

3. Roles and Responsibilities

- **The Supply Chain Lead** is responsible for this guideline and its implementation through the delegation of authority to Subcontractor Sponsors.
- **The SHEQ Lead (SHEQ Governance)** is responsible for ensuring this procedure meets KBS Maritime SHEQ governance requirement.
- **The Quality Management Representative** is responsible for ensuring this document meets the requirements of the KBS Maritime Business Management Framework and Quality Policy.

4. Guideline Overview

KBS Maritime Supply Chain Department and specific KBS Maritime Subcontractor Sponsors are responsible for ensuring that all subcontractors and their respective teams are aware of these guidelines and understand the requirements placed upon them when entering HMNB(P).

4.1 Security Vetting

Subcontractors will be required to complete security clearances (to the appropriate level as defined by KBS Maritime for the work to be delivered) themselves either through their own vetting capability (if applicable) or through a recognised security vetting provider. KBS Maritime will not complete security clearances on behalf of subcontractors. In line with the HMNB(P) Security Standing Orders (SSOs) Version 2.1 "all non-resident contractors will be mandated to have a valid and in date security clearance in place prior to accessing the Naval Base and commencing work".

It is the role of our subcontractors to complete security clearances for their staff. Clearances for KBS Maritime subcontractors will be verified by BAE Systems Vetting on behalf of KBS Maritime and vetting verification shared with the pass office in advance of any visit to site. See KBS Maritime Supply Chain Vetting Guidance as referenced in section 5.1 of this document.

It is mandated that all non-resident contractors and sub-contractors must be in possession of a Baseline Personnel Security Standard (BPSS) security check in order to gain access into HMNB(P) to engage in projects or works. Therefore, as a minimum all KBS Maritime Staff and Contractors are to have completed a BPSS Check. Depending on work to be carried out in the completion of their duties individuals may be required to complete a Counter Terrorist Check (CTC), Security Check (SC) and/or Developed Vetting (DV).

- **Baseline Personnel Security Standard (BPSS)**
This is not a security clearance but is a package of pre-employment checks. People on whom a BPSS has been completed are authorised to have access to OFFICIAL, OFFICIAL-SENSITIVE (RESTRICTED (Legacy)) and CONFIDENTIAL (Legacy)/SECRET material of UK origin on a need to know basis. The check comprises of three parts: establishing the identity of the employee, obtaining references and a criminal record declaration.
- **Counter Terrorist Check (CTC)**
This is used to reduce the risk from terrorism. A CTC clearance does not allow access to protectively marked material unless a BPSS has also been completed.
- **Security Check (SC)**

This involves a number of checks intended to provide an assurance of a level of integrity beyond that provided by the BPSS. This clearance entitles the holder to - on a need to know basis - regular access to SECRET as well as occasional access to TOP SECRET. An SC is the minimum level of clearance for all NATO and overseas material marked OFFICIAL, OFFICIAL-SENSITIVE (RESTRICTED (Legacy)) and CONFIDENTIAL (Legacy)/SECRET and above. This consists of a BPSS plus a Security Questionnaire.

- Developed Vetting (DV)

This clearance, entitles the holder to - on a need to know basis - regular access to TOP SECRET. This consists of a BPSS plus completion of a Security Questionnaire, DV Questionnaire which includes a Financial Questionnaire.

Security clearances are reviewed at five and ten year intervals depending on the level.

Changes in personal circumstances such as marriage or any convictions must be reported immediately to the BAE Vetting Team at Vetting.Ms@baesystems.com, as this may require a further clearance check.

4.2 Site Access

Site access is controlled by the HMNB(P) Head of Security (Sy Head) with requirements for site access defined in the Portsmouth Naval Base Security Standing Orders (SSOs).

It is a requirement that whilst on PNB all Contractors, Sub-Contractors and Visitors wear their ID Card/Security pass in a visible and prominent position at all times. This includes whilst wearing foul weather jackets, PPE, coats and any other outdoor wear.

KBS Staff, Contractors and visitors are responsible for ensuring that they comply with the KBS and the Portsmouth Naval Bases Security Policies. In addition, there is an expectation that everybody working or visiting the site should take a proactive role in ensuring that those around them comply with the site policy, and challenge those who fail to display appropriate ID Cards.

All employees and contractors working within and requiring access to HM Naval Base Portsmouth will be required to complete the site induction either online or in person at Trafalgar Gate. Responsibility for the Health and Safety of visitors to HM Naval Base Portsmouth lies with the host/sponsor.

Visitors and contractors will not be issued a permanent Naval Base contractor pass or given access to ships or buildings for 'works activities' without a valid white 'T' card (Works refers to a task generally involving the use of a tool and is a task where the individual may be exposed to significant hazard or risk). 'T' card induction briefs are managed by the Contractor Reception Centre (CRC) at Trafalgar Gate. The inductions can be applied for via email at Vetting.Ms@baesystems.com.

4.3 Passes

Permanent PCN passes will no longer be issued or renewed for non-resident contractors and they will be issued Green visitor passes for the duration of the contracted service provision up to a maximum of 30 days. This may be extended further if supported by a clear business reason as an exception, subject to approval by Base Security.

PCN passes maybe issued for non-resident contractors who are delivering projects extending beyond the 30 day period (on a cases by case basis). In line with the HMNB(P) Security Standing Orders permanent passes will only be issued if there is a regular access requirement into the Naval Base in excess of 3 times per week or a business requirement which requires the holder to access the Naval Base in an emergency or outside of normal working hours on any day of the year.

KBS Maritime Sponsors must complete a Visitor Notification Form (VNF) which should be submitted at least 24 hours prior to date of visit. The subcontractor will be requested to provide the following details for all subcontractor personnel planning to visit or work on the site in support of the contracted work;

- Surname
- Forename
- Company
- Nationality*
- Clearance Level
- Date of Birth

* a separate Foreign National Risk Assessment form will need to be submitted for any sub-contractor staff that are not UK Nationals. This will need to be submitted 5 working days in advance of any planned visit.

In exceptional circumstances only, where delays would have a detrimental effect on business, individuals will be risk assessed and the decision to allow escorted access and the issue of a red pass, agreed by MOD Base Security Team and the relevant contractor security team. In all cases, the BPSS must be completed as soon as possible. In such circumstances the KBS sponsor is to contact Assistant Base Security Officer at michelle.day855@mod.gov.uk for approval.

Nominated non-resident contractors, with a verifiable security clearance, can act as Escorts and will be issued a green pass with ESCORT printed on them. Escorts are to be nominated by the Sponsor and annotated on the VNF. The number of Escorts is restricted to the minimum and ratios must be in accordance with Naval Base policy of 1:8. If any doubt, refer to Base Security for clarification.

Non-resident contractors will only be granted access to the Naval Base out of hours or at weekends in the event of an emergency or if access is required for work purposes which have been authorised and approved by Base Security.

4.4 Searches

All subcontractors entering HMNB(P) should be aware that the Military have the right to search their person and/or their vehicle. This search may be conducted by MOD Guard Force or the Ministry of Defence Police (MDP).

There is a Zero Drug tolerance at HMNB(P) with the MDP performing unpredictable and random Passive Drug searches throughout the establishment with a licenced Drugs Detection Dog. Where persons are identified by the Passive Drugs Dog, the MDP Handler or support officers will carry out additional Police checks and can perform section 23 Misuse of Drugs Act searches where they have reasonable grounds to suspect that a person is in possession of any drugs.

Where an individual has been identified by Passive Drugs Dog(s) and all police checks have been completed, whether searches have been performed or not, the information will then be passed to the duty Base Security officer (BSyO), under an Information sharing agreement signed between MDP and BSyO, for a direction as to allowing individuals onto the establishment, refer the individual for a 'with cause' urine test or refusal of entry. Where the Base Duty Security officer, acting on behalf of the Naval Base Commander (NBC) and Head of Security (HdSy) decides to withhold access to site the individual's passes will be removed and they will be directed to leave the establishment. The individual will be informed of a right to appeal against this decision which must be raised with Base Security within one month of the ban.

4.5 Mobile Devices, Photography and Communications Equipment

The use of a mobile phone is permitted within HMNB(P), except where signs state their use is prohibited by local Restrictions. If uncertain of the rules in any building or vessel the user is to consult the BrSOs/USOs or building officer for guidance. It is important to note that conversations on mobile phones, normal BT lines and external e-mail can be intercepted therefore consideration should be given to the topic and the information discussed by these mediums.

Photography on the naval base, either via a camera or the camera facility on a mobile phone, is not permitted unless permission has been given to do so. Images taken on a mobile phone within HMNB(P) must not be sent unless permission has been given by Base Security. It should be noted that a full business case must be provided to support any request and only official devices with the corporate serial number will be considered. A signature will be required to ensure that all photography policies are adhered to, including the agreement to not upload any images captured within the Naval Base to Social Media.

Communications Equipment including Handheld and Fitted Radios is expressly forbidden unless permission has been given by Base Security. Where fitted to vehicles the equipment must not be turned on whilst in the confines of the Naval Base. If a genuine requirement exists for the use of this equipment permission is to be sought from the Base IT Security Officer (ITSO) who will request Site Clearance Installation & Design Authority (SCIDA) to research the channels/frequency for interference/ Tempest issues prior to permitting its use.

5. Supporting Information

5.1 Version History

Version Number	Date Issued	Comments
1.0	October 2021	First publication
2.0	11 th March 2024	Standard review no changes