



**Australian Government**  
**Australian Radiation Protection  
and Nuclear Safety Agency**



# **Submission to the Joint Committee of Public Accounts and Audit Inquiry**

**Australian Government Security  
Arrangements: Personnel Security based  
on Auditor-General's report 38 (2017-18)**

## Introduction

The Australian Radiation Protection and Nuclear Safety Agency (ARPANSA) is the Australian Government's primary authority on radiation protection and nuclear safety. With 133 staff across two locations in Melbourne and Sydney, ARPANSA's purpose is the protection of people and the environment from the harmful effects of radiation through research, the services we provide and regulation of Commonwealth entities that use radiation.

ARPANSA is committed to protecting its people, information, intellectual property, assets, activities and facilities against misuse, loss, damage, disruption, interference, espionage or unauthorised disclosure. The agency implemented the Government's Protective Security Policy Framework (PSPF) as part of the Government's requirements, this is reflected in our Agency Protective Security Policy, plan and procedures.

ARPANSA welcomed the Australian National Audit Office (ANAO) performance audit as an opportunity to verify our own assessment of compliance against the PSPF. In practice, the findings of the audit aligned with our self-assessment, including our 2016-2017 annual report on compliance and highlights that ARPANSA has a developed protective security program that with a little work will be fully compliant with the PSPF.

## Recommendations and ARPANSA actions

The Audit noted two recommendations for ARPANSA:

1. Recommendation No. 7: ARPANSA review their policies and procedures for eligibility waivers to ensure they are compliant with PSPF mandatory controls
2. Recommendation No. 8: ARPANSA implement the PSPF requirement to undertake an annual health check for clearance holders and their managers.

### Recommendation 7: Eligibility Waiver

The ANAO identified four ARPANSA staff members who were granted a waiver of citizenship however were not subject to an annual risk assessment on their suitability (PERSEC-5).

Since the finding ARPANSA has reviewed and will soon finalise the update of our procedural requirements to undertake and record suitability risk assessments every year for those staff and contractors granted an eligibility waiver. This allows ARPANSA to manage the personnel security risks and to ensure compliance with PSPF mandatory controls.

Of the four staff with waivers at the time of the audit, one staff member is no longer an employee of ARPANSA, two staff have subsequently obtained or applied for Australian citizenship and one staff member (a dual British/New Zealand national) has undergone the revised annual waiver assessment that resulted in the endorsement from our Security Executive and approval from our CEO.

From a policy and procedural perspective, ARPANSA will achieve compliance upon finalisation of the updated procedure.

## **Recommendation 8: Annual health check for clearance holders and their managers**

The finding on the requirement for annual health checks for clearance holders (PERSEC-7) was consistent with an internal compliance self-assessment in 2017 that identified and targeted this non-compliance for action. Consultation and coordination efforts with ARPANSA's People and Culture section has occurred since that time to design and implement the health checks. The health checks will be rolled out in the second half of 2018 whereby line managers will conduct the health check annually in accordance with the PSPF. ARPANSA senior management are also expected to take an active role in the oversight and assessment of ongoing suitability of their staff, with these matters to form part of standing items in Executive Group meetings as well as through a range of internal staff communication activities to equip staff with a clear understanding on their roles and expectations.

ARPANSA is expecting to obtain full compliance for the next reporting period.

## **Areas for improvement**

The audit also identified a number of areas for improvement where ARPANSA was deemed to be partially compliant. ARPANSA accepted all of the identified 'areas for improvement' by the ANAO and have either completed their implementation or are in the process of incorporating them into our policies and procedures for implementation as soon as possible. These findings have been summarised on the following page.

Question	ANAO comments	ARPANSA response	Status
Do entities have appropriate risk-based policies, plans and procedures for personnel security?	ARPANSA was assessed as mostly met in a number of areas (Ref Table 3.1). This was a result of some deficiencies in the ARPANSA policy and plans (GOV-1, GOV-5 & GOV-6)	Feedback has been considered and integrated into the 2018 review of the Agency Security Policy and Plan that is currently underway.  Any movement towards provision of templates by Attorney-General's Department is of benefit to ARPANSA particularly due to our size and resource constraints.	To be completed 2 <sup>nd</sup> half of 2018.
Do entities assess the eligibility and suitability of personnel to access government resources?	ARPANSA did not have all recommended and additional checks under AS4811 in place as part of employment screening checks (PERSEC-1)  Recruitment forms did not provide for more detailed reasoning on clearance requirements and reassessment dates (PERSEC-3)	ARPANSA has assessed non-mandatory requirements for undertaking employment screening that meets or exceeds AS4811 and determined that additional checks are not required by default due to the risk profile of the agency.  Recruitment forms and processes are scheduled to be amended to ensure additional reasoning for security clearances is included.	To be completed 2 <sup>nd</sup> half of 2018.
Do entities share relevant information with AGSVA?	ARPANSA did not have updated consent forms in employment screening packs to obtain informed consent from individuals to share personal information with other entities, including AGSVA (PERSEC-8)  ARPANSA did not notify AGSVA of withdrawal of sponsorship for individuals who have left ARPANSA (PERSEC-9)	Employment screening packs have been updated.  Processes have been updated to ensure that when notifying AGSVA of separation, sponsorship is also withdrawn.	Completed