



INVITATION TO TENDER No. GSA/OP/03/09

PRS Operational Tool to Evaluate and Counteract Threats Originating from Radio-sources ("PROTECTOR")

Clarification 8 – Project consultants and security aspects

Question: What is the baseline for project consultants (e.g. legal or management support) regarding security aspects, in particular, if those consultants do not hold a Personal Security Clearance (PSC) or Facility Security Clearance (FSC)?

GSA Answer:

All persons who will have access (e.g., storage, working, reading, creating, copying etc.) to CONFIDENTIAL level or higher information need to have a valid PSC from the appropriate National Security Authority (NSA) giving authority to access the correct classification level of the information.

Any company premises where information classified CONFIDENTIAL level or higher will be processed (e.g., storage, working, reading, creating, copying etc.) needs to have a valid FSC issued by the appropriate NSA at the correct classification level. It should be noted that FSCs are issued to sites, not companies; thus within a company the processing of CONFIDENTIAL or higher may be limited to certain sites. These sites should be clearly identified in the offer so that the GSA can confirm the FSC with the NSA involved.

If the company intends to subcontract work involving the processing of CONFIDENTIAL level or higher information but the work will take place at the company's premises then the subcontractor does not need an FSC. However, the subcontractor staff processing the CONFIDENTIAL level or higher information will need a PSC. If the subcontractor's personnel will be processing CONFIDENTIAL level or higher information at the subcontractor's premises, the subcontractor site will need an FSC (in addition to the subcontractor staff's PSC).

In either of the above cases the subcontractor should be clearly identified in the offer and the rules on subcontractors identified in the SAL and European GNSS PSI should be followed. In particular, companies should note the need to pass on these security provisions to their subcontractors.

If the subcontractors will not be processing classified information of any kind then no PSCs and FSCs for subcontractor personnel / sites are required. If the subcontractors will be processing classified information at the level of RESTRICTED then the provisions in the PSI/SAL regarding classified subcontracts will apply but there is no requirement for subcontractor PSCs / FSCs unless mandated by national laws.

NOTE: National rules may be more stringent than the above rules. Where this is the case, companies are obliged to apply their national regulations as directed by their NSA.