

Formal Submission to the Consultation on Enhancements to the Critical Infrastructure Risk Management Program (CIRMP) Rules

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Date: 23 May 2024

Context: Response to the Enhanced CIRMP Rules Consultation Paper concerning Personnel Hazards.

1. Introduction and Core Position

Cleard Life Vetting Agency is an Australian-based specialist provider of workforce screening and personnel security vetting solutions. We are unique in the industry as we are **independently certified as conformant to all mandatory clauses of the Australian Standard AS 4811:2022 Workforce Screening**.

We strongly support the Department's intent to strengthen the security of Critical Infrastructure (CI) by addressing "Personnel Hazards" within the CIRMP framework.

Our core position is that to genuinely mitigate the risk of insider threats—the most complex threat facing CI—the minimum standard for personnel suitability assessment within the CIRMP must be elevated to the **full requirements of AS 4811:2022**.

2. The Insufficiency of Current Personnel Screening

The current focus on transactional background checks (such as police checks and identity verification, sometimes referred to as 'point-in-time checks') is necessary, but fundamentally insufficient to meet the CIRMP's objective of mitigating material risk.

Risk Management Gap

AS 4811:2022 Solution

Vulnerability & Coercion: Standard checks fail to identify key insider threat indicators like undisclosed financial distress, severe personal relationship issues, or vulnerabilities to coercion or blackmail.

Mandatory 1:1 Suitability Interviews: AS 4811:2022 closes this gap by mandating a structured, one-on-one interview for high-risk roles (i.e., Critical Workers). This is the only defensible method to assess character, integrity, honesty, and tolerance—the core suitability criteria—which cannot be determined by automated checks alone.

Incomplete Risk Decision: Without context, raw information from a background check (e.g., a minor, decades-old offense) often leads to poorly adjudicated or risk-averse hiring decisions.

Mandatory Risk Assessment (Adjudication): The Standard requires a formal, auditable **Personnel Risk Assessment** using all collected data. This transforms raw check results into a clear, justifiable Green/Amber/Red suitability decision, ensuring the CIRMP is based on a structured risk management process (in line with ISO 31000 principles), not just a checklist.

Ongoing Suitability: Personnel risk does not stop post-hire. The CIRMP requires ongoing risk management.

Full-Lifecycle Screening: AS 4811:2022 mandates a continuous, full-lifecycle approach, including requirements for **Ongoing Suitability Assessments** (e.g., annual check-ins) and proper security protocols for **Separating Personnel**, ensuring risks are managed throughout the entire employment period.

3. Recommendations for the Enhanced CIRMP Rules

To ensure the Enhanced CIRMP Rules deliver practical and effective personnel security outcomes, we recommend the following clarifications and requirements be included in the accompanying guidance:

Recommendation 1: Mandate Conformance with AS 4811:2022 for Personnel Hazards

The Department should update the CIRMP guidance to explicitly state that **full conformance with the mandatory ("shall" or "must") clauses of AS 4811:2022 is the benchmark for satisfying the personnel hazard requirements** for critical workers.

Recommendation 2: Explicitly Require the Suitability Interview

The guidance must clarify that a **structured, one-on-one suitability interview** is an essential and non-negotiable component of any robust suitability assessment for Critical Workers, as required by AS 4811:2022. Processes that rely solely on automated or transactional checks will be viewed as non-compliant with the intent of mitigating insider threat.

Recommendation 3: Recognise AS 4811 Conformance for Compliance Relief

The Department should recognise and promote AS 4811:2022 as the **unified national standard** for suitability screening. This would:

- a) **Reduce Compliance Burden:** Provide a single framework for entities operating across multiple security regimes (CIRMP, DISP, PSPF).
- b) **Enable Smaller Entities:** Encourage the use of third-party providers that are certified as fully conformant to AS 4811:2022. This offers a high-assurance, ready-made solution for Critical Infrastructure entities that lack the internal resources to run a full in-house vetting program.

Conclusion

The insider threat is a material risk to Australian Critical Infrastructure. To effectively manage this risk as required by the CIRMP Rules, entities must move beyond basic background checks and implement a rigorous, risk-based vetting framework.

Cleard Life Vetting Agency has already invested in achieving full conformance to AS 4811:2022, demonstrating that this robust standard is commercially viable and ready for immediate adoption. We urge the Department to endorse this standard as the definitive pathway for compliance with the personnel hazard requirements under the enhanced CIRMP Rules.

We would welcome the opportunity to discuss our findings and methodology further.

[End of Submission]