



S12 – Security Guarding Industry Leadership Group

S12 Labour Exploitation (Operation Empower) – Formal Meeting Minutes

Date: 25 November 2025

Duration: 1h 1m

Chair: Ahmad Rafique (CEO, SSG Support Services Group)

Attendees: Ahmad Rafique, Paul Fullwood, Richard Harris, L. Turner (UKSICA), Jay Bullock, Claire Shrosbree, Phil Garnett, Jason Roughley, others

Purpose of Meeting

Set direction for the S12 Labour Exploitation workstream under Operation Empower. Review exploitation patterns, regulatory updates, and agree priorities for 2025–2026.

Key Discussion Points

- Workstream Objectives: Eliminate labour exploitation across the private security industry. Focus areas: transparent supply chain register, inclusion of all tiers in frameworks/licensing, national awareness campaign.
- Current Challenges: Complex supply chains, hidden exploitation (low pay, unsafe hours, unlawful deductions), misuse of umbrella companies, weak auditing, contract pricing pressures, low confidence in reporting.
- Operation Empower Update: 150+ live investigations; 262 reports (Jan–Sept 2024). Key findings: 57% NMW breaches, 27% cash-in-hand/bogus self-employment, 22% visa/right-to-work issues, 28% linked to ACS-approved businesses.
- Industry Engagement Concerns: Low participation (13 attendees vs. large industry size). Need stronger outreach and faster timelines.
- Framework Development: Proposed roadmap – draft framework by Q1 2026, pilot Q3, final publish Q4. Pushback: timeline too long; need accelerated action.
- Integration with Other Workstreams: Labour exploitation links to training malpractice, business licensing, and vetting standards.

Agreed Actions

Action	Owner	Deadline
Share presentation/data summary with workstream members	Ahmad Rafique	Before next meeting
Circulate template for ideas/solutions (from Training Malpractice workstream)	Claire Shrosbree	Before next meeting
Develop engagement plan to increase participation (social media, outreach)	S12 Leadership	Immediate



Arrange face-to-face workshop to accelerate framework development and agree deliverables	Ahmad Rafique & Paul Fullwood	Within 4 weeks
Draft initial fit & proper supply chain guidelines for discussion	Jay Bullock (with input from group)	2 months
Map interdependencies with other workstreams (licensing, training)	Paul Fullwood	Ongoing
Collect intelligence and evidence from members (redacted, trend-focused)	All attendees	Ongoing
Propose revised timeline for framework delivery (shorter than 12 months)	Ahmad Rafique	Next meeting

Next Steps

- Schedule next formal meeting with agenda focused on timeline revision and framework structure.
- Confirm date for in-person workshop.