



S12 – Security Guarding Industry Leadership Group

Minutes Labour Exploitation Workstream Meeting

Date:	12 June 2026
Time:	10:00am (BST)
Location:	Microsoft Teams (Video Conference)
Workstream Chair:	Steven Moore – Security Guarding Industry Leadership

Attendees

Gemma Newman – S12 Board Member (Acting Chair (in the absence of Steven Moore))	Deborah Dobrin (External)
Paul Fullwood (S12 COO)	Tim Harrison (External)
Anisah Mehmood S12 (Secretariat)	Andy Thomas (External)
Jenna Smith (S12 Comms)	Andy Button (External)
Richard Harris (External)	Paul Thrupp (External)
Chris McKay (External)	James Doyle (External)
Bill Mannix (External)	Muhammed Khan (External)
Leigh Turner (External)	

Apologies

Steven Moore – S12 Workstream Chair	Gary Culloden – S12 Board Member
Claire Shrosbree – S12 Board Member	Simon Alderson – S12 Board Member



Item 1: Introductions, Apologies & Code of Conduct

1.1 The Chair opened the meeting, confirmed that the session was recorded, and noted that the Code of Conduct had been circulated.

1.2 Apologies were formally recorded.

Item 2: Fair Work Agency (FWA) Overview

2.1 Tim Harrison (FWA) presented an overview of the Fair Work Agency, established in April 2026 under the Employment Relations Act 2025.

2.2 The FWA brings together enforcement functions from:

2.2.1 Gangmasters and Labour Abuse Authority

2.2.2 Employment Agency Standards Inspectorate

2.2.3 HMRC National Minimum Wage Enforcement (transition phase)

2.3 Key priorities for 2026–27 were outlined:

2.3.1 Intelligence and data improvement

2.3.2 Stakeholder engagement and awareness

2.3.3 Organisational learning and thought leadership

2.3.4 Reduction of regulatory burden

2.3.5 Preparation for expanded remit from 2027

2.4 A compliance-led approach was confirmed, supported by enforcement where required.

Item 3: Industry Risks and Concerns

3.1 Significant risks within the private security sector were highlighted, including:

3.1.1 Tax evasion

3.1.2 Debt bondage

3.1.3 Organised crime involvement

3.1.4 Phoenixing of companies

3.2 Concerns discussed:

3.2.1 Employment status and PAYE compliance

3.2.2 Use of ad hoc and freelance workforce models

3.2.3 Contract undercutting below sustainable rates

3.3 The FWA confirmed awareness of sector risks and emphasised the importance of intelligence sharing from stakeholders.

Item 4: HMRC Input

4.1 HMRC outlined key compliance challenges:

4.1.1 Misclassification of workers as self-employed



- 4.1.2 Activity within the hidden economy
- 4.1.3 Need for PAYE compliance to ensure fairness

4.2 Current enforcement approach includes:

- 4.2.1 Joint operations with SIA and law enforcement
- 4.2.2 Audit and inspection activity
- 4.2.3 Increased cross-government working

Item 5: Exploitation Trends and Intelligence

5.1 Emerging risks identified:

- 5.1.1 Workers paid outside UK payroll systems
- 5.1.2 Visa misuse and illegal employment
- 5.1.3 Overcrowded and exploitative housing arrangements
- 5.1.4 Complex supply chains reducing transparency

5.2 Key requirements:

- 5.2.1 Improved intelligence reporting
- 5.2.2 Enhanced worker awareness of rights
- 5.2.3 Clear communication for non-English speakers

Item 6: Industry Practices and Solutions

6.1 Effective controls discussed included robust audit processes covering payroll, timesheets, and compliance checks.

6.2 Recommended actions:

- 6.2.1 Development of standardised audit frameworks
- 6.2.2 Improved client education on charge rates
- 6.2.3 Increased cost transparency to prevent undercutting
- 6.2.4 Adoption of learning from other sectors

Item 7: Policy and Regulatory Developments

7.1 Mandatory business licensing was discussed as a potential mechanism to improve compliance and standards.

7.2 Concerns raised relating to:

- 7.2.1 Current regulatory gaps
- 7.2.2 Effectiveness of proposed business approval schemes
- 7.2.3 Increase in ACS fees

Item 8: Labour Exploitation Charter

8.1 An initial draft charter was presented for high-level feedback.



8.2 Feedback highlighted:

8.2.1 Need for clear and accessible language

8.2.2 Inclusion of practical examples to reduce misinterpretation

8.2.3 Suggestion to circulate high-level headings for wider input

Item 8: Any Other Business: No additional items were raised

Item 9: Next meeting date: 10 July 2026

Item 10: Close of Meeting

The Chair thanked attendees for their contributions and formally closed the meeting at 10:54am.

Action No.	Action Description	Owner	Meeting Date	Status	Deadline/update
1.23	Arrange follow-up engagement session with FWA to discuss sector-specific risks and intelligence sharing	SM/PF	12/06/2026	Closed	June 2026
1.24	Collate and share emerging intelligence (e.g. visa abuse, payment practices, housing concerns) with relevant authorities	SM/All Members	12/06/2026	Open	June 2026
1.27	Share best practice audit frameworks and compliance approaches across members	GN/SM	12/06/2026	Open	June 2026
1.28	Provide charge rate calculator tool to HMRC/FWA for review and feedback	L. Turner	12/06/2026	Open	June 2026
1.29	Promote awareness of worker rights and PAYE obligations across the sector	All Stakeholders	12/06/2026	Open	June 2026



1.30	Identify opportunities for cross-sector learning (e.g. construction, care) to inform workstream outputs	Workstream Team	12/06/2026	Open	June 2026
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