



15 June 2026

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*Cc: Michelle Russell, Chief Executive Security Industry Authority | Shaun Hipgrave –
Director Homeland Security*

Dear Tim,

Re: S12 BAS workstream feedback

Thank you for your detailed response of 27 March and for the continued engagement from yourself, Mike White, and the wider SIA team throughout the BAS development process. The S12 BAS workstream has now reviewed your response collectively and discussed the points raised across a broad range of member organisations, including ACS and non-ACS businesses of varying scale and operating across multiple sectors of the industry.

At the outset, I would like to reiterate that there remains strong support within the group for the SIA's wider objective of raising standards across the private security industry and strengthening public protection. There is also recognition that a considerable amount of work has clearly gone into the BAS design and that the SIA has positively engaged with several of the concerns previously raised by the workstream. In particular, the group welcomes the move toward entity-wide assessment, the increased focus on labour provision and supply chain controls, the efforts to improve assessor consistency, and the recognition that BAS must ultimately align with any future Mandatory Business Licensing framework.

Having now considered the proposals and your response in detail, there remains a consistent concern across the workstream that BAS, in its current form, may not yet represent sufficient evolution from ACS to fully deliver the level of market assurance, differentiation, and operational credibility that many stakeholders had hoped for. The core concern emerging from the group is not opposition to reform, but whether BAS sufficiently addresses many of the structural weaknesses already recognised within

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ACS, or whether further development work will be required during and after consultation to achieve this. Several contributors commented that, while the direction of travel is positive, there remains a risk that BAS could ultimately be perceived by buyers and industry alike as “ACS under a different name”, rather than a fundamentally different assurance framework.

A particularly significant area of discussion across the workstream has been the question of differentiation and buyer confidence. While the move away from numerical scoring is understood, many members remain unconvinced that the current model will provide buyers with sufficient visibility of organisational quality, maturity, and operational performance. There is widespread concern that a threshold-style approval model risks creating the same issues already experienced under ACS, namely that businesses meeting minimum compliance expectations may still be perceived by buyers as representing consistently high-quality service delivery.

The workstream therefore welcomed the reference within your response to the possible use of a descriptive, criteria-based assessment approach similar in principle to modern Ofsted reporting frameworks. Many members felt this may provide a constructive basis for further development of BAS, particularly in helping buyers and stakeholders better understand organisational strengths, areas requiring improvement, and differing levels of operational maturity across multiple domains, rather than relying solely on a single approval outcome. The workstream would welcome the opportunity to contribute more detailed input on potential models for descriptive performance ratings and buyer-facing outputs as your thinking in this area develops.

The group felt this type of framework could provide a more meaningful and transparent picture of organisational capability than either numerical scoring or simplistic hierarchical tiers. For example, businesses could receive clearly defined assessment outcomes across areas such as governance and leadership, workforce compliance, operational delivery, supply chain management, resilience, customer assurance, and labour integrity. Importantly, members felt this approach would better reflect operational reality. Most organisations perform strongly in some areas while requiring development in others, and a single approval outcome does not always provide sufficient distinction for informed procurement decision-making or meaningful differentiation between operators.

However, there was equally strong agreement that such a framework would only carry credibility if the assessment methodology behind it was sufficiently robust. The workstream believes the effectiveness of any differentiated grading model is directly dependent upon the quality, consistency, and operational credibility of the inspection regime supporting it. This includes clearly defined assessment criteria, meaningful

evidence challenge, operationally experienced assessors, strong moderation processes, and a greater focus on how systems operate in practice rather than how they are presented during assessment.

While the group welcomes the intention to strengthen operational assessment and move beyond purely documentary review, there remains concern that the underlying assurance model continues to rely heavily on sampling, self-reporting, planned audits, and assessor judgement. Many members highlighted that organisations could prepare selectively for audits and direct assessors toward compliant areas of operation, while underlying issues may remain undetected elsewhere within the business. For this reason, there was broad support across the workstream for exploring, at least on a targeted or pilot basis, stronger and more dynamic assurance mechanisms, including greater use of unannounced inspections, intelligence-led auditing, workforce-level sampling, and more continuous oversight between formal assessment periods. The view of the group is that the long-term credibility of BAS will depend not simply on the standards themselves, but on visible and consistent enforcement and assurance activity.

The workstream remains strongly aligned with the SIA's objective of improving labour compliance and welcomes the changes already introduced around self-employment within labour supply. However, concerns remain around whether the current proposals go far enough to provide confidence that workforce compliance is genuinely being tested in operational reality.

The group fully accepts that BAS cannot replicate HMRC's role or provide forensic validation of every employee and every shift. Equally, there remains a view that there is likely to be a middle ground between the current position and full real-time workforce monitoring. Several contributors felt there may be opportunities to strengthen assurance, in a way that remains proportionate and aligned with HMRC's statutory role, through targeted workforce sampling, enhanced payroll reconciliation testing, risk-based data validation, intelligence-led interventions, and closer operational integration with HMRC where lawful and proportionate. At the same time, it was acknowledged that large-scale workforce data integration presents significant legal, technical, and operational challenges which should not be underestimated.

There was also broad agreement that the future role of BAS will depend heavily on the eventual structure and robustness of Mandatory Business Licensing. We note and welcome the SIA's stated intention that BAS should be able to align with any future Mandatory Business Licensing regime. Several members felt that if MBL becomes sufficiently robust and genuinely difficult to achieve, BAS may ultimately need to evolve into a much more clearly differentiated quality and excellence framework sitting above

baseline regulation, rather than operating primarily as a broader compliance assurance scheme.

The group strongly welcomed the SIA's recognition that buyer understanding and procurement engagement will be critical to the success of BAS. However, there remains concern that BAS alone will not materially shift procurement behaviour unless accompanied by sustained buyer education, clearer public differentiation, stronger procurement guidance, and greater alignment with public sector and major sector procurement frameworks. There was also support for expanding the information available on the public register to provide buyers with a clearer understanding of organisational profile, operational scale, recognised capability, and operating model.

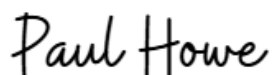
Overall, the S12 BAS workstream remains supportive of the SIA's broader direction of travel and the objective of improving standards and public protection within the private security industry. However, the consistent view emerging from the group is that BAS currently appears more aligned to a strengthened compliance assurance framework than a genuinely differentiated quality assurance framework capable of clearly distinguishing excellence and best practice, supporting informed procurement decisions, and driving continuous improvement across the sector.

The workstream believes the long-term success and credibility of BAS will depend heavily upon the strength and visibility of enforcement, the credibility of operational assurance, meaningful differentiation of higher-performing organisations, robust assessor capability and consistency, and the extent to which the scheme genuinely closes the gap between documented compliance and operational reality.

We remain committed to engaging constructively with the SIA throughout the next stages of consultation and development, and would welcome continued dialogue on differentiation, operational assurance and labour integrity as the proposals evolve.

Yours sincerely,

Paul Howe



On behalf of the S12 Security Guarding Leadership Group