



S12 – Security Guarding Industry Leadership Group

Minutes Labour Exploitation Workstream Meeting

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

Attendees

Steven Moore – S12 Workstream Chair	Gemma Newman – S12 Board Member
Paul Fullwood (S12 COO)	Tim Harrison (External)
Anisah Mehmood S12 (Secretariat)	Andy Thomas (External)
Jenna Smith (S12 Comms)	Kelly Booker (External)
Richard Harris (External)	Amanda Pezzaniti (External)
Andrew Bourke (External)	James Doyle (External)
Bill Mannix (External)	Muhammed Khan (External)
Leigh Turner (External)	Deborah Dobrin (External)
Mike Reddington (External)	Gary McConnell (External)
Clare Kitchen (External)	Teresa O'Neill (External)
Clare Rogers – NSI (External)	Christal O'Connor (External)
Peter Lewis (External)	Mohammad Masood (External)
Gemma Parmar (External)	Nouman Shazad (External)
Paul Thrupp (External)	Sha Hussain (External)
Jessica Spencer (External)	

Apologies

Gary Culloden – S12 Board Member	Simon Alderson – S12 Board Member
Claire Shrosbree – S12 Board Member	



Item 1 – Welcome, Introductions and Opening Remarks

1.1 The Chair welcomed attendees and noted the strong attendance.

1.2 Members were advised of a minor amendment to the agenda to include an S12 update from Paul Fullwood.

1.3 A reminder was provided regarding the S12 Code of Conduct, with discussions to focus on behaviours and industry issues rather than individual organisations or persons.

Item 2 – S12 Programme Update

2.1 Paul Fullwood provided an update on current S12 activities and workstreams.

2.2 The former Non-ACS Workstream has transitioned into a Canine Specialist Workstream, with significant industry engagement and participation.

2.3 S12 continues to support the introduction of business licensing and the removal of the in-house exemption. Further engagement with government is expected following the Home Office consultation.

2.4 Ongoing discussions are taking place with the SIA regarding the proposed voluntary Business Approval Scheme, with S12 advocating for enhanced robustness and assurance measures.

2.5 A new Vetting and Digitisation Workstream has been established to explore consistency in vetting standards and opportunities for improved data sharing.

2.6 Communications campaigns are being developed across several workstreams, including Labour Exploitation and Training Malpractice.

2.7 S12 continues to engage with the Home Office to seek greater legislative protection for security operatives who are assaulted while carrying out their duties.

Item 3 – BS 10119 Update

3.1 Clare Rogers (NSI) provided an overview of the newly published BS 10119 Standard for Labour Provision.

3.2 BS 10119 has been developed from COP119/NCP119 to provide a formal, independently verifiable standard for labour provision activities.

3.3 The standard broadly aligns with the existing COP119 framework, enabling a straightforward transition for organisations already certified.

3.4 Additional requirements include:

- SIA licence verification.
- Counter-terrorism training requirements.
- Complaint handling processes.
- Enhanced labour provision governance measures.



3.5 The standard aims to address labour provision activities that sit outside the scope of ACS assessments.

Item 4 – Labour Provision Due Diligence Findings

4.1 Clare Rogers highlighted that labour provision due diligence remains one of the most common audit findings.

4.2 Many organisations continue to incorrectly assume that ACS accreditation alone satisfies labour provision due diligence requirements.

4.3 Common areas of concern include:

- Employment status arrangements.
- Right-to-work checks.
- Screening compliance.
- Inadequate labour charge rates.
- PAYE compliance.

4.4 Improvement notices are issued where deficiencies are identified, with unresolved issues escalated through SIA processes.

4.5 Members were encouraged to utilise available reporting routes where concerns regarding labour exploitation or non-compliance are identified.

Item 5 – Labour Exploitation Communications Strategy

5.1 Jenna Smith presented a draft Labour Exploitation Communications Strategy.

5.2 The proposed campaign is built around three key themes:

- Recognising labour exploitation.
- Challenging labour exploitation.
- Reporting labour exploitation.

5.3 Additional campaign themes include:

- Victim impact.
- Industry standards and professionalism.
- Informal labour supply channels.
- Reporting mechanisms and awareness.

5.4 Members discussed the importance of ensuring reporting routes are clearly communicated.

5.5 Concerns were raised regarding encouraging internal escalation where this could place exploited individuals at greater risk.

5.6 It was suggested that external reporting options, including the Fair Work Agency, should be considered within campaign materials.



5.7 A communications subgroup will be established to further develop the campaign strategy and supporting materials.

Item 6 – Labour Exploitation Charter

6.1 Steven Moore provided an update on progress with the Labour Exploitation Charter and confirmed that feedback received to date had been incorporated into the latest draft.

6.2 Richard Harris suggested broadening the focus of the Charter to reflect workforce protection and assurance, recognising that labour exploitation is often the result of wider industry challenges.

6.3 Members discussed the relationship between labour exploitation and wider issues including:

- Procurement practices.
- Training malpractice.
- Workforce competency.
- Labour supply arrangements.

6.4 Paul Fullwood advised that the Charter should remain an aspirational and evolving document that supports industry-wide commitment to agreed principles and values.

6.5 Leigh Turner highlighted the importance of recognising the different regulatory responsibilities held by organisations including the SIA, HMRC and the Fair Work Agency.

6.6 It was agreed that greater awareness of regulatory responsibilities, reporting routes and potential enforcement action could assist in improving industry standards.

Item 7 – Labour Provider Accreditation and Procurement

7.1 Members discussed continuing industry confusion regarding the difference between ACS accreditation and labour provider certification.

7.2 It was noted that procurement teams often request ACS accreditation from labour providers despite COP119/NCP119 and BS 10119 being more relevant standards.

7.3 Members agreed that improving understanding of labour provider standards would help reduce labour exploitation risks and strengthen procurement decisions.

7.4 Further discussion highlighted the importance of recruitment and employment regulations in strengthening worker protections and raising industry standards.

Item 8 – Any Other Business

8.1 No further business was raised.

Item 9 – Next Meeting Date

9.1 The next Labour Exploitation Workstream meeting will take place in August 2026. Calendar invitations will be circulated separately.



Item 10 – Close of Meeting

10.1 Steven Moore thanked attendees for their participation and contributions.

10.2 The meeting was formally closed at 10:54am.

Action No.	Action Description	Owner	Meeting Date	Status	Deadline/Update
1.17	Circulate the draft Labour Exploitation Communications Strategy to workstream members for review and feedback. (Review and refine reporting routes – safeguarding considerations)	Jenna Smith / workstream members	10 July 2026	Open	August 2026
1.18	Establish a Labour Exploitation Communications Subgroup to support development of campaign messaging and materials.	Jenna Smith	10 July 2026	Open	August 2026
1.19	Explore options to improve communication and document sharing between meetings to enable wider collaboration and feedback on workstream outputs.	Steven Moore/S12 Team	10 July 2026	Open	August 2026
1.20	Review the Labour Exploitation Charter and provide further comments, amendments and suggested additions.	All Members	10 July 2026	Open	August/September 2026