



S12 – Security Guarding Industry Leadership Group

Minutes of the (MBL) Mandatory Business Licensing, (BAS), Data Sharing & Buyer Education Workstream Meeting

Date:	18 August 2026
Time:	9:00am (BST)
Location:	Microsoft Teams (Video Conference)
Workstream Chair:	Peter Harrison – Security Guarding Industry Leadership

Attendees

Peter Harrison – S12 Workstream Chair	Paul Howe (S12 Board Member)
Anisah Mehmood - S12 Secretariat	Leigh Turner (External)
Jenna Smith – S12 Comms	Liv Deploi (External)
Teresa O'Neill (External)	Jane Eden (External)
Richard Harris (External)	Andy Thomas (External)
Jessica Spencer (External)	Stuart McBride (External)

Apologies

Paul Evans (S12 Chair)	Paul Fullwood – S12 COO
Simon Alderson (S12 Board Member)	Abbey Petkar (S12 Board Member)
Rachel Fleri (S12 Board Member)	Sam Butcher (External)

Item 1 – Welcome, Introductions and Opening Remarks

Item 1.1 Attendance and Purpose

The Chair welcomed attendees and introduced S12 representatives.

Item 1.2 Previous Minutes

The minutes of the previous meeting were reviewed and approved with no amendments raised.

Item 2. Mandatory Business Licensing (MBL)

Item 2.1 Home Office and Government Update

The Chair reported that publication of the Home Office consultation response has been delayed due to changes in ministerial responsibilities. Members were advised that the consultation outcome is expected shortly and that discussions with the Home Office remain positive.

It was noted that:

- Industry support for Mandatory Business Licensing has been significant.

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- Early indications suggest that legislative progress could begin during 2027.
- A simpler licensing model may be more likely to secure parliamentary approval than a more complex legislative approach.

Item 2.2 Industry Feedback and Discussion

Members discussed the balance between introducing robust regulatory controls and avoiding unnecessary barriers to entry for new businesses.

Key themes included:

- The importance of establishing minimum fit and proper standards.
- Verification of business ownership, insurance, governance and financial legitimacy.
- The need for both company licensing and individual licensing to operate effectively together.
- The role of mandatory licensing in reducing labour exploitation and poor employment practices.

Item 2.3 Industry Consultation Questions

The workstream considered three strategic questions for future Home Office engagement:

1. What should constitute a buyer offence where organisations knowingly purchase security services from unlicensed providers?
2. How should labour providers be incorporated within a mandatory licensing framework?
3. How should business licences and non-frontline licences interact, particularly where ownership or control changes?

Item 3. Position Paper and Stakeholder Engagement

Item 3.1 Position Paper Development

The existing workstream manifesto is being condensed into a shorter position paper to provide clearer and more accessible messaging for stakeholders and policymakers.

Item 3.2 Parliamentary Engagement

Members were advised that a template letter is being developed to support engagement with Members of Parliament.

The aim is to enable industry representatives to:

- Highlight local examples of malpractice.
- Demonstrate support for Mandatory Business Licensing.
- Encourage parliamentary backing for upcoming legislative proposals.



Item 4. Business Approval Scheme (BAS)

Item 4.1 BAS Update

No significant developments were reported since the submission of the workstream's previous feedback.

Item 4.2 Assessment Consistency

Members reiterated concerns regarding the consistency of BAS assessments and approvals.

Discussion focused on:

- Differences in interpretation between assessment bodies.
- Variations between individual assessors.
- The importance of maintaining a consistent and transparent approval process.

Item 5. Data Sharing

Item 5.1 Industry Collaboration

The workstream remains committed to developing a practical data-sharing initiative across participating organisations.

Potential areas for collaboration include:

- Screening and vetting information.
- Redacted audit and quality assurance data.
- Demonstrating industry willingness to cooperate with regulators and government.

Further proposals are expected following upcoming S12 Board discussions.

Item 6. Buyer Education

Item 6.1 SIA Buyer Guide Consultation

An update was provided on the SIA Buyer Guide consultation.

Members noted that the consultation period had been extended and that the workstream had submitted a formal response.

Item 6.2 Workstream Feedback

The workstream expressed concern that established accreditation schemes and standards were not sufficiently reflected in the draft guidance.

Key observations included:

- Limited reference to recognised industry accreditation schemes.
- A lack of emphasis on established assurance frameworks.
- The opportunity to improve buyer decision-making through greater reference to recognised standards and certifications.



Item 7. Strategic Discussion and Industry Feedback

Item 7.1 Buyer Offences

The workstream considered what a future buyer offence could look like where organisations knowingly engage security providers that do not meet licensing or regulatory requirements.

Members noted that:

- Any future buyer offence should act as a meaningful deterrent and discourage organisations from knowingly procuring security services from unlicensed or non-compliant providers.
- Existing legislation relating to supply chain due diligence, fraud prevention and corporate responsibility could potentially be utilised or strengthened rather than creating entirely new legislation.
- Penalties should be proportionate but significant enough to remove any commercial benefit gained through non-compliance.
- Consideration should be given to sanctions beyond financial penalties, including restrictions on future procurement activity.
- Buyers who have undertaken reasonable due diligence and engaged an appropriately licensed provider should not be held responsible where non-compliance occurs further down the supply chain without their knowledge.
- Greater buyer education is required to help organisations identify accredited and compliant providers.

Item 7.2 Labour Providers

Members discussed the role of labour providers within a mandatory licensing framework and generally agreed that they should be included.

Feedback included:

- Labour providers should be subject to the same fit and proper standards as security providers.
- Excluding labour providers would create a significant loophole within any licensing framework.
- Mandatory licensing should include verification of employment practices, HMRC compliance, worker welfare arrangements and governance structures.
- The security sector's dependence on flexible labour provision was recognised; however, this should not reduce accountability standards.
- Opportunities should be explored to align any licensing requirements with the developing role of the Fair Work Agency.
- Greater regulation could assist in addressing labour exploitation, underpayment, false self-employment arrangements and other non-compliant employment practices.



Item 7.3 Business Licences, Non-Frontline Licences and Changes of Ownership

The workstream discussed the relationship between business licences and existing non-frontline licences, together with how licences should be managed following a change in ownership.

Members agreed that:

- The primary focus should be on the suitability of those exercising ownership, control and influence within licensed businesses.
- Consideration should be given to identifying responsible persons or controlling minds rather than requiring every board member to hold an equivalent licence.
- A change in ownership should trigger an appropriate review, reassessment or transfer process.
- Security businesses should not be able to bypass licensing requirements through the sale or acquisition of existing accredited companies.
- Any transfer process should balance regulatory oversight with legitimate commercial transactions.
- Significant acquisitions and investment activity should include due diligence regarding ownership, funding arrangements and suitability of new controlling parties.
- Consideration should be given to requiring a re-audit or shortened certification period following a change of ownership to confirm ongoing compliance.

Item 8. Fair Work Agency

Item 8.1 Regulatory Developments

Members received an update on engagement with the Fair Work Agency.

The Agency's expanded remit and enforcement powers were noted, together with opportunities for future collaboration on:

- Labour exploitation.
- Employment rights compliance.
- Supply chain accountability.

Item 9. Internal Communications

Item 9.1 Member Engagement Platform

An update was provided on plans to develop an internal communications platform for S12 members.

The proposed platform would facilitate:

- Two-way engagement between members.
- Secure document sharing.
- Discussion forums and collaboration outside formal meetings.

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- Improved communication across workstreams.

The proposal is expected to be considered further at the September Board meeting.

Item 10. AOB

Item 10.1 Industry Expertise

Members discussed the value of engaging with Bill Butler to explore lessons learned from previous regulatory models and licensing initiatives.

Item 10.2 Historical Licensing Models

Discussion took place regarding earlier tiered accreditation and licensing approaches and whether similar concepts could help smaller businesses progress towards higher standards of compliance and accreditation.

Item 11. Next Meeting Date

Item 11.1 Next Meeting 15 September

Item 12. Close of Meeting

There being no further business, the Chair thanked members for their contributions and closed the meeting at 10:02am.

Action Summary

Action No.	Action Description	Owner	Meeting Date	Status	Deadline/Update
1.15	Monitor the publication of the Home Office consultation response on MBL provide updates	Peter Harrison / S12	18 August 2026	Ongoing	Expected September 2026
1.16	Finalise and circulate the MBL Position Paper.	Jenna Smith / S12 Team	18 August 2026	In Progress	September 2026
1.17	Finalise and distribute the MP engagement letter	Jenna Smith / S12 Team	18 August 2026	In Progress	September 2026



1.18	Develop consolidated recommendations on buyer offences, labour providers and business licensing requirements for future engagement with the Home Office and SIA.	S12 Workstream	18 August 2026	Ongoing	October 2026
1.19	Continue engagement with the Fair Work Agency regarding employment compliance and labour exploitation matters.	S12 Representatives	18 August 2026	Ongoing	Ongoing
1.20	Engage with Bill Butler to discuss previous licensing models and potential lessons for future MBL proposals.	Jenna Smith / S12 Leadership	18 August 2026	New	September 2026
1.21	Develop proposals for an internal member communications platform and present recommendations to the Board.	Jenna Smith	18 August 2026	In Progress	September 2026 Board Meeting
1.22	Represent the workstream at the SIA Board meeting and provide an update on outcomes.	Peter Harrison / S12 Representatives	18 August 2026	Planned	3 September 2026



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