

Title	Minutes of the Board Meeting
Description	Minutes of the Board Meeting held 25 July 2024
Paper owner	Heather Baily
Paper author	Nick Hill
Agenda reference	01a
Meeting date	07 November 2024

The Board is invited to approve these minutes.

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Freedom of Information

Reference to discussion on this paper at the meeting will usually be published in the Board minutes unless exempted under the Freedom of Information Act 2000. Board papers may be published or released on request unless exempted under the Freedom of Information Act 2000.

For completion by the author:

Should this paper be considered for exemption under freedom of information?

YES

If yes, please provide the reason for non-disclosure and exemption that applies:

Agenda item 1, point 1.14 – FOI exemption applies – s35 – As information contained references formulation of government policy

Agenda item 3, point 3.4 - FOI exemption applies - s36 – As information would prejudice the effective conduct of public affairs

Agenda item 6 – FOI exemption applies – s36 – As information would prejudice the effective conduct of public affairs

Agenda item 6 – FOI exemption applies – s22 – As information would prejudice the effective conduct of public affairs

Agenda item 7 – FOI exemption applies – s22 – As information is intended for future publication

Agenda item 7 – FOI exemption applies – s43 – As information prejudices commercial interests

Minutes of the Board Meeting on 25 July 2024

Date: 25 July 2024

Time: 11:00 – 15:00

Location: 10 South Colonnade, London

Chair: Heather Baily

Attendees:

Trevor Reaney, non-executive director and Board member

Duncan Worsell, non-executive director and Board member

Michelle Russell, Chief Executive and Board member

Paul Fullwood, Director of Inspections and Enforcement and Board member

Natalie Benton, Director of Corporate Services and Board member

Tim Archer, Director of Licensing and Standards and Board member

Fiona Wilson, Interim Director of Transformation and Board member

Jeremy Bennett, Head of Legal Services and General Counsel

Nick Hill, Governance Manager (secretariat)

Kevin Barretto, Head of Finance and Procurement (items 1-9)

██████████ Senior Legal Advisor (item 4)

Alero Harrison, Head of Communications (items 4, 5 and 6)

Tony Holyland, Head of Individual Standards (item 5)

Tony Stafford, Principal Policy Advisor (item 6)

Iestyn David, Head of Licensing & Service Delivery (item 6)

██████████ Senior Finance Business Partner (item 7 and 8)

Francesca Green, Head of Corporate Information (item 9)

██████████ Senior Data Analyst (item 9)

Motunrayo Sholola, Strategy & Planning Manager (item 9)

Steve Howe, Transformation Programme Manager (item 10)

Jane Debois, Head of Business Standards (item 11)

Staff observers:

██████████ Senior Finance Business Partner

██████████ Business Relationship Manager

██████████ Senior Legal Advisor

External observers:

Jodie Gibson, Head of Home Office Sponsorship Unit

Shehla Husain, Deputy Director and Head of Public Protection, Home Office

Angela Wilson, Deputy Director SFBP Corporate & Delivery, STAR and Strategy, Home Office

Apologies:

Caroline Corby, non-executive director and Board member

Zoe Billingham, non-executive director and Board member

Simon James, non-executive director and Board member

Paul Glibbery, non-executive director and Board member

1. Welcome and apologies for absence, declarations of interest, minutes of the previous meeting and matters arising

Welcome and apologies

1.1 The meeting was held face to face.

1.2 There were apologies from Zöe Billingham (non-executive Board member), Simon James (non-executive Board member), Caroline Corby (non-executive Board member), and Paul Glibbery (non-executive Board member).

1.3 The meeting was quorate.

- 1.4 The Chair welcomed Shehla Husain, Deputy Director and Head of Public Protection, Home office, Jodie Gibson, Head of Home Office Sponsorship Unit, and Angela Wilson, Deputy Director SFBF Corporate & Delivery, STAR and Strategy, Home Office.
- 1.5 The Chair welcomed [REDACTED] the Business Relationship Manager, [REDACTED] the Senior Legal Advisor and [REDACTED] the Senior Finance Business Partner, as staff observers.

Declarations of interest

- 1.6 There were no declarations of interest made.

Minutes of previous meeting

- 1.7 The June 2024 Board minutes were approved.

Matters arising.

- 1.8 Action Nov-23-5 and Feb-24-05: An update on the Inspections & Enforcement Directorate KPIs to be discussed at the Board in October 2024. To remain open.
- 1.9 Action Feb-24-01: The Board meeting action on prosecutions GIAA audit was discussed at the Audit and Risk Assurance Committee in July 2024. To be closed.
- 1.10 Action Feb-24-02: An explanation on how Section 19 Delegations operate was provided by the Director of Inspections & Enforcement at the Home Office Sponsorship Unit meeting in July 2024. To be closed.
- 1.11 Action Feb-24-03: A future update on Special Interest Groups to be provided every six months at Board. To be closed.
- 1.12 Action May-24-03: An update is expected on the DBS Programme Business Case and its efficiencies – any significant outcome for SIA would be noted at the SIA Board in November 2025. To remain open.
- 1.13 Action Jun-24-01: The Director of Corporate Services and Director of Licensing & Standards submitted the briefing paper to the Public Protection Policy Team at the Home Office. Closed.

[REDACTED]

[REDACTED]



2. Chairs Report

- 2.1 The Chair presented her paper which was taken as read. She reported that there had been an extraordinary Board meeting held on the 20th of June which formally agreed the revised strategic and policy approach to dealing with sexual offences in 'Get Licensed' enabling the Home Office to put advice to the new Minister before the proposed consultation.
- 2.2 The Chair noted that on 22 July 2024, the SIA held its 20th Anniversary event at the House of Lords, with numerous front line security officers.

THANKS: The Board thanked the Head of Communications and their team for the work done in hosting the event.

- 2.3 The Chair presented the Board Effectiveness Review Paper and Annex A, which proposed minor changes to the Board Effectiveness Review actions. The Chair will oversee the actions to enable continued development of the Board and how it operates in line with the recommendations.

3. Chief Executive Report

- 3.1 The Chief Executive presented her paper, highlighting four key points, articulated in points 3.2 – 3.5.
- 3.2 The closure of the Annual Report and Accounts this year by the NAO has not been completed. A further update is to be provided under ARAC report, agenda item 14.
- 3.3 The excellent work undertaken by the Licensing and Service Delivery Team despite the large volumes of applications (53,158 (paid) applications this quarter). The licensing teams have worked particularly hard to drive down waiting service requests and live applications and at the end of the quarter both had reduced, as well as deal with unexpected system and partner issues.

- 3.4 The work being done in the digital and data space on risk management, with cyber essentials accreditation and new MDR facility helping to manage down the risks. The Director of Corporate Services noted that an update on cyber security and data culture is scheduled at the October 2024 ARAC meeting.
- 3.5 The Chief Executive reported she visited Manchester on 24 July 2024 for International Security Officer Day events organised by the regional City Security Council members the day before, attended by SIA staff and herself in Manchester, noting the Chair attended similar events in London. She had seen firsthand some excellent examples of effective partnership and collaboration between police and private security. She also reported back some of the helpful feedback learnt from speaking directly to front line licence holders on the visits. This included positive feedback on licence holders' regular use of their first aid training and top up content. In addition, although there was general support for continuing refresher training, concerns were expressed about the cost for individual licence holders whose companies did not fund or pay for them to attend and so the number of days courses took.

4. SIA prosecutions update

- 4.1 The Head of Communications joined the meeting.
- 4.2 The Director of Corporate Services introduced the paper on the update on SIA prosecutions, following the audit by the Government Internal Audit Agency (GIAA) presented at ARAC in July 2024.
- 4.3 The Head of Legal Services & Policy and Legal Counsel presented the paper, which was taken as read and noted that the audit provided good assurance to the executive and Board on the appropriateness and robustness of controls to support decision-making with regard to SIA's criminal prosecutions. The key findings and points were summarised (as listed at point 4 in the accompanying paper).



[REDACTED]

4.7 A NED Board member welcomed the refreshed Public Interest Test policy, and the work the Legal Services Team has done in ensuring that this is applied consistently and transparently to cases.

5. Policy Proposals for Licence Linked Refresher Training Content

- 5.1 The Head of Individual Standards joined the meeting.
- 5.2 The Director of Licensing & Standards introduced the paper on proposals for refresher training from October 2024. He noted that the importance the refresher training has in providing front line operatives with the right skills set and preventing skills fade following the previous training changes and top ups in 2021.
- 5.3 The Head of Individual Standards presented the content of the paper, which sought approval from the Board to progress recommendations for continued refresher training content for door supervisors and security guard licence holders once the current cycle of mandatory top up training ends in October 2024.
- 5.4 The paper set out the previous refresher training principles along with the proposed training content for the qualifications and prerequisites, which was set out in more detail in Annex A to the paper. It was noted that the training specifications have been worked up with the Awarding Organisations alongside the full learning outcomes and indicative content. The proposal was for a six-month transition between top-up training ending and requiring as mandatory refresher training for licence renewal applications which was the same period for top up training introduction.

[REDACTED]

5.6 A NED Board Member queried the flexibility to adjust the content of the refresher training in future, in case new areas of training was required in the three-year period. The Head of Individual Standards referred to the paper he brought to Board in May, explaining the new approach to updating content means the SIA will conduct an annual review of content each year to identify any fundamental changes which might be required; where the specifications can be adjusted immediately, they will, otherwise more fundamental changes will be proposed in more frequent updates.

5.7 The Chief Executive noted from her discussions with front line officers and ACS business on visits there was support for continuing training, but the main concern was the cost and lost work time for the licence holders; only some businesses provide this for staff, whereas others pay this for themselves. The difference between two- and three-days duration made a material difference to them. She had also heard the plea for knowledge of the changes to be confirmed as soon as possible.

5.8 A discussion was held regarding the proposed six-month period between the introduction of the refresher training in October 2024, and when it becomes mandatory in April 2025.

DECISION: The Board approved the recommendation for the refresher training for door supervisors and security guards' content once the current cycle for mandatory training ends in October 2024, and for it to be mandatory from April 2025. The Board stressed the importance of the changes being supported by clear and regular communications.

6. Review of Licence Dispensation Notice regime

6.1 The Head of Licensing & Service Delivery and Principal Policy Advisor joined the meeting.

- 6.2 The Chief Executive introduced the paper, noting she had commissioned a review of the Licence Dispensation Notice (LDN) facility which is available to security businesses approved under the ACS. The Director of Licensing and Standards was leading this review.
- 6.3 These businesses can use a LDN to deploy an individual who has lodged a licence application, but it is still being processed. Whilst LDNs had a legitimate purpose when they were introduced in the legislation in 2001, the purpose of the review is to assess whether and how ACS businesses are now using LDNs, to consider the public protection risks and scope and assess the policy options for the future, including the fundamental question of whether LDNs have a legitimate purpose and should remain available. She had asked the review team to bring recommendations on the future of the LDN facility to the scheduled Board strategy meeting on 20 September 2024.
- 6.4 The Director of Licensing & Standards presented the paper. The reviews terms of reference are set out in paragraph 14 of the paper, including to consider whether there is still a case to retain LDNs on public protection or other grounds, taking into account the wider business impact and public protection consequences if LDNs were to be withdrawn and to make recommendations for appropriate changes.

[REDACTED]

- 6.6 The Principal Policy Advisor noted the proposed consultation on the changes to Get Licensed brought to the Board in June 2024 would offer an opportunity to seek further stakeholder views on applying a more risk-averse approach to a wider range of offending. The executive proposes to include in the consultation questions on whether the SIA should consider applying the more risk-averse approach to types of offending other than sexual and child neglect cases.

- 6.7 The Chief Executive noted that businesses do not need to notify the SIA or obtain its permission when they issue a first LDN, for a period of up to ten weeks and this raises public protection issues. ACS businesses are required to obtain written SIA authorisation to issue a second LDN to the same individual.
- 6.8 It was noted that from informal discussions with businesses and as far as the SIA could see LDNs were used most whilst waiting for Disclosure Scotland criminality checks to come back, whilst applicants sought overseas criminality certificates and where employed renewal applicants had left their renewal to the last minute. However, the responses from the survey commissioned for ACS businesses will provide confirmation on whether this is correct and the extent of their use.
- 6.9 The Head of Licensing & Service Delivery, the Principal Policy Advisor, the Head of Individual Standards and the Senior Legal Advisor left the meeting.

DECISION: The Board approved a consultation based on June 2024 proposal which would offer an opportunity to seek stakeholder views on applying a more risk-averse approach to a wider range of offending.

7. Annual Fee Review

- 7.1 The Head of Corporate Information, the Senior Data Analyst and the Data Analyst joined the meeting.
- 7.2 The Head of Finance & Procurement presented the paper on a review of the individual licensing fee and ACS licensing fee in accordance with the requirements of Managing Public Money, providing recommendations to Board on future fee levels.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- 7.4 The Head of Finance & Procurement confirmed the individual licensing fee payable is now at its lowest level since the inception of the SIA. It is critical that, in future years, in light of continued economic uncertainty and rising costs, expenditure is carefully managed and that a strong focus is maintained on

achieving efficiencies. The Head of Finance & Procurement went through the assumptions for the fee review, which had been subject to ARAC scrutiny. It was agreed that the fee model for this review should use the refreshed central demand forecast for future periods.

- 7.5 It was noted that the assumptions include that the expected October 2024 increase in DBS unit costs for standard checks could be met without a fee increase from the efficiencies the SIA is making.
- 7.6 It has been recommended to the Chief Executive as Accounting Officer, based on the professional judgement of the Head of Finance & Procurement and Director of Corporate Services, supported by this fee review, that:
- a) *The individual statutory licensing fee should remain at its current statutory level of £204.*
 - b) *No changes are made to the ACS fees.*
- 7.7 It was noted that the new Business Approval Scheme would change the ACS scheme and as part of that programme of work a costing exercise and fee review will be necessary on the associated expenditure base.

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

- 7.9 The importance of the work in being done to refresh of the Target Operating Model was also important to generating efficiencies.
- 7.10 It was noted that further individual fees modelling ought to be undertaken earlier in 2025 and brought to ARAC for scrutiny and discussion.

DECISION: The Board approved the individual statutory license fee remaining at its current statutory level of £204.

DECISION: The Board approved no changes be made to the ACS fees.

8. Q1 Finance Report

- 8.1 The Head of Finance & Procurement presented the paper which covered the first quarter of financial year 2024 – 2025, which the Board noted.
- 8.2 The Deputy Director SFBP Corporate & Delivery, STAR and Strategy, Home Office flagged the increase in the Disclosure and Barring Service costs scheduled for the 1 October 2024. The Head of Finance & Procurement confirmed to the Board that this has been included in the expenditure modelling.

9. Performance

2024/5 Q1 KPI dashboard and quarterly performance report

- 9.1 The Strategy and Planning Manager joined the meeting.
- 9.2 The Senior Data Analyst presented the quarter 1 dashboard alongside the key performance indicators (KPIs) and summarised the key highlights.
- 9.3 The Director of Inspections & Enforcement noted that KPI 1a has significantly over exceeded its month-on-month target notwithstanding the 20% uplift in the target for FY24/25. Board Action Nov-23-5 and Feb-24-05 is looking at future KPIs (outcomes and outputs).
- 9.4 It was noted that the unexpected increased demand of licences appeared mainly driven by rest of world applications from student visa holders seeking seasonal work as the summer outdoor events season begins.

Business Plan 2023 – 2024 Q4 and end of year performance report

- 9.5 The Strategy & Planning Manager reported on the SIA's performance for quarter 1 against the 2024 – 2025 business plan, which it was asked to note.
- 9.6 There are 16 key deliverables, only one of which was not on track: the establishment of an employee engagement forum. This is due to organisation resourcing as Director lead had has to prioritise other pieces of work. A new Director has been appointed the lead, and work will be picked up in quarter 2.
- 9.7 The Head of Corporate Information, the Senior Data Analyst, the Data Analyst and the Strategy & Planning Manager left the meeting.

10. Transformation Programme 24/25 Q1 Review

- 10.1 The Transformation Programme Manager and Digital Transformation Lead joined the meeting.
- 10.2 The Interim Director of Transformation introduced the presentation and noted that the purpose of the review was to update the Board about what the team is currently working on.
- 10.3 The Digital Transformation Lead confirmed to the Board that the SIA had obtained the overall spending approval envelope for the Data, Digital and Technology strategy and programme of work being delivered over the next three years of the strategy.
- 10.4 The Chief Executive reminded the Board that various approvals had already been obtained for the main managed service contract and for other aspects at different times for different purposes and on different timelines; this refreshed approval sought to bring them all together.
- 10.5 The Transformation Programme Manager provided a summary of the 2024 – 2025 baseline programme plan. The Digital Transformation Lead noted that an extraordinary Executive Director’s Group meeting has been arranged on 18 September 2024 as key decisions are required on various organisational wide data matters to progress with the data and digital programme.
- 10.6 The Transformation Programme Manager and Digital Transformation Lead left the meeting.

11. Business Approval Scheme Programme Update

- 11.1 The Head of Business Standards and the Business Standards Programme Manager joined the meeting.
- 11.2 The Head of Business Standards presented the paper, which was an update on delivering the business approval scheme programme. On 11 July 2024, the initial consultation findings were made available on the gov.uk website.
- 11.3 The Head of Business Standards noted that recruiting for the Business Approval Scheme specialists remained a critical challenge, and so the windows for recruitment had been extended. Regular reviews are being conducted to ensure that the scheme of work can be delivered despite the challenges.
- 11.4 The Head of Business Standards and the Business Standards Programme Manager left the meeting.

Action Jul-24-01: The Business Standards Programme Manager to include an updated project timeline as part of standing board report in November.

12. Licensing and Standards Forward Look Report

12.1 The Director of Licensing & Standards presented the licensing and standards forward look report, which the Board was asked to note. The report highlighted the initiatives and activities the directorate will be focusing on during quarter 2 which are over and above core business activity. He noted that the most significant items had been discussed under their own agenda items (5, 6 and 11).

13. Inspections and Enforcement Forward Look Report

13.1 The Director of Inspections & Enforcement presented the inspections and enforcement forward look report, which the Board was asked to note.

13.2 The Director of Inspections & Enforcement highlighted that work continues on Project Evolve and the proposals on future KPIs will be brought to October 2024 Board meeting.

13.3 The Director of Inspections & Enforcement discussed Operation Benchmark, which is looking at tackling training malpractice, fraud and criminality. He reported a summit was to take place on 30 July 2024, with the six awarding organisations, and Ofqual to influence further action to tackling training malpractice and improved partnership working.

13.4 The Director of Inspections & Enforcement also noted that Operation Empower had been launched publicly, tackling labour exploitation within the private security industry in partnership with HMRC and other key partners.

14. Audit, Risk and Assurance Committee update

14.1 The Chief Executive introduced the ARAC update in the absence of the Chair of ARAC. She informed the Board that the Annual Report and Accounts were not ready for the July 2024 ARAC meeting as the National Audit Office had not completed its work. She was only informed of the issue by the NAO on 25 June 2024, slightly ahead of the ARAC meeting on 4 July 2024.

- 14.2 The closure of the accounts this year by the NAO has proved to be a very challenging final audit this year, despite an all-clear interim audit. The NAO have informed us there is nothing else SIA can do or provide at this juncture, but they still want to follow up some matters further. As a result, the audit completion statement will not be made for some weeks and so the accounts will not be ready to be signed off and laid until the autumn this year.
- 14.3 The Director of Corporate Services noted that the National Audit Office had changed its audit methodology, which in turn caused significant delays in the report being completed. An update from the NAO is not expected until after 22 August 2024.
- 14.4 The Chief Executive put on the record her and the Directors thanks to the whole SIA Finance Team and other staff who have worked incredibly hard - over long hours, weekends and evenings for weeks to meet NAO deadlines and deal with numerous additional queries and follow ups this year.

15. People Committee Meeting update

- 15.1 The Director of Corporate Services provided a verbal update on the People Committee. The Cabinet Office guidance had not been released therefore the 2024 Staff Pay Award could not be discussed.

16. Equality, Diversity and Inclusion update

- 16.1 The Interim Director of Transformation noted the Equality, Diversity and Inclusion (EDI) pulse surveys which were discussed at the EDI Committee.
- 16.2 The Chief Executive noted that a deeper dive is planned on the two annual pay gaps at the next People Committee meeting.

17. Any Other Business

- 17.1 [REDACTED] Head of Finance and Procurement is leaving the SIA after 10 years. On behalf of the Board and the SIA, the Chair thanked him for all his hard work and service.
- 17.2 She also noted that Trevor Reaney, Non-executive Board Member, was leaving the SIA in November 2024 as his term is finishing; this meeting was his last

formal Board meeting, and the Chair thanked him for all his hard work and years of service on the Board.

DECISION: The Board approved the 2025 Corporate Calendar.

Next Meeting: Thursday 7 November 2024