

Title	Minutes of the Board Meeting
Description	Minutes of the Board Meeting held 14 November 2024
Paper owner	Heather Baily
Paper author	Nick Hill
Meeting date	06 February 2025

The Board is invited to approve these minutes.

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For completion by the author:

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YES

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Agenda item 4 – paras 4.3-4.9 FOI exemption applies – s36 – As information would prejudice the effective conduct of public affairs

Agenda item 5 – paras 5.1 and 5.2 FOI exemption applies – s36 – As information would prejudice the effective conduct of public affairs

Agenda item 8 – paras 8.1-8.5 FOI exemption applies – s22 – As information is intended for future publication

Agenda item 10 – para 10.6 FOI exemption applies – s43 – As information is likely to prejudice commercial interests

Minutes of the Board Meeting on 14 November 2024

Date: 14 November 2024

Time: 11:00 – 15:30

Location: 10 South Colonnade, London

Chair: Heather Baily

Attendees:

Caroline Corby, non-executive director and Board member (items 1 – 5)
Simon James, non-executive director and Board member
Paul Glibbery, 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

Preeya Sahni, Head of Legal Services & Policy
Nicola Podd, Head of Strategy & Governance and Chief of Staff
Nick Hill, Governance Manager (secretariat)

Tony Stafford, Principal Policy Advisor (item 4 and 5)
Alero Harrison, Head of Communications (items 6 and 7)
[REDACTED] Senior Manager Industry Engagement (item 7)
[REDACTED] Investigations Officer (item 7)
[REDACTED] Performance Improvement and Support Manager (item 7)
Francesca Green, Head of Corporate Information (item 9)
[REDACTED] Senior Data Analyst (item 9)
[REDACTED] Strategy & Planning Manager (item 9)
Andrea Noble, Digital Transformation Lead (item 10)
Laura Johnson, Head of Estates (item 10)

Staff observers:

[REDACTED] Senior Finance Business Partner

External observers:

Shehla Husain, Deputy Director and Head of Public Protection, Home Office
Caroline Rowe, Public Protection Unit, Public Safety Group, Home Office

Hannah McCarthy, Home Office Sponsorship Unit (deputising for the Head of Home Office Sponsorship Unit)

Apologies:

Zoe Billingham, NED Board member

Yasin Patel, Head of Finance & Procurement (items 1-8)

Jane Debois, Head of Business Standards (item 11)

Jodie Gibson, Head of Home Office Sponsorship Unit

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), Yasin Patel (Head of Finance & Procurement), Jane Debois (Head of Business Standards), and Jodie Gibson (Head of Home Office Sponsorship Unit).
- 1.3 The meeting was quorate.
- 1.4 The Chair welcomed Shehla Husain, Deputy Director and Head of Public Protection, Home office, Caroline Rowe, Public Protection Unit, Public Safety Group, Home Office, and Hannah McCarthy, Home Office Sponsorship Unit (deputising for the Head of Home Office Sponsorship Unit) as external observers.
- 1.5 The Chair welcomed Nicola Podd, the new Head of Strategy & Governance and Chief of Staff, Preeya Sahni, the new Head of Legal Services & Policy and General Counsel, and Daniela Chaves, Senior Finance Business Partner, as a staff observer.

Declarations of interest

- 1.6 There were no declarations of interest made.

Minutes of previous meeting

- 1.7 The July 2024 Board minutes were approved.
- 1.8 The Extraordinary 20 September 2024 Board minutes were approved.
- 1.9 The Extraordinary 3 October 2024 Board minutes were approved.

Matters arising.

- 1.10 Action Nov-23-05, Feb-24-05 and Oct-24-01: An update on the Inspections and Enforcement Directorate KPIs was discussed at the extraordinary Board meeting in Belfast, October 2024. The completion of the action has been extended due to Martyn's Law Regulator announcement. Open.
- 1.11 Action May-24-03: An update on the DBS Programmes Business Case and its efficiencies. This will be dealt with via email correspondence. To be closed.
- 1.12 Action Jul-24-01: The Business Approval Scheme timelines. These will be included in the agenda update as part of standard reporting. To be closed.
- 1.13 Home Office Action Feb-24-03: No further Home Office update on the outcome of the Simon Bailey Review advice and Ministerial Decision. Awaiting feedback. Open.
- 1.14 Home Office Action Oct-15-08, Jul-22-01 and Jul-22-02: A meeting took place 13 November 2024 bringing together SIA experts on RIPA with the Home Office on existing SIA powers. Also included as agenda item. Open.

2. Chair's report.

- 2.1 The Chair presented her paper which was taken as read. She reported that the SIA Board had met on the 20th of September for a Board Strategy session, which included an update from the Director of Licensing & Standards on the License Dispensation Notice (LDNs) regime, following the discussion at the previous Board meeting on 25 July 2024.
- 2.2 The Chair reported that the SIA Board members had held a meeting on 3 October with the Director of Safer Communities for Department of Justice in Northern Ireland and members of his team together with a senior representative from Police Service for Northern Ireland, at the Stormont Buildings in Belfast.
- 2.3 The Chair noted two non-executive director changes at the SIA. Trevor Reaney's term ended on 6 November 2024, and Zoe Billingham's terms is due to end on 5 December 2024. She added that the SIA had now received Ministerial agreement to commence a Public Appointment recruitment process to fill the vacancy created by Zoe's departure. She added that she has also been given Ministerial agreement to add an additional non-executive director role to the Board, to bring experience of protective security and counter terrorism to the Board, which will support the planning for the regulatory responsibilities brought by Martyn's Law once the Terrorism (Protection of Premises) Bill concludes and receives Royal Assent.

- 2.4 The Chair drew attention to her appointment of Caroline Corby to become the SIA Deputy Chair, replacing Trevor Reaney.
- 2.5 The Chair drew attention to her appointment of Duncan Worsell to become the SIA People Committee Chair, replacing Zoe Billingham.
- 2.6 The Chair noted that she held a meeting with the Minister for Safeguarding and Violence Against Women and Girls, Jess Phillips on 28 October 2024.

DECISION: The SIA Board approved the slight amendment to the People Committee Terms of Reference.

3. Chief Executive Report

The Chief Executive presented her report, highlighting four key points:

- The high number of licence applications for the first half of the year totalling 103,071, which was 9% above the original budget assumptions set in December 2023.
- Since the last quarterly Board meeting, the Home Secretary made the decision that the government had chosen the SIA as the proposed regulator of Martyn’s Law with Royal Assent expected in the Spring. She noted that the SIA Board is holding a dedicated strategy session on 26 November 2024 to discuss this further.
- The Executive had escalated the existing risk in the risk register on the impact of Martyn’s Law to a strategic risk regarding the impact and implementation of the proposal the SIA should be the regulator. This will be jointly owned with the Home Office.
- [REDACTED]

- 3.1 A NED Board Member queried the impact of Martyn's Law on the SIA's resources and management of core business practices. The Chief Executive assured the Board that this work will be funded separately by the Home Office. She reported that the SIA was waiting to hear how much as this will come after the "blue print" work has concluded. She added that it will be grant funded, and the Home Office is due to write to the SIA about different funding options.
- 3.2 A NED Board Member queried what the impact of the National Insurance Tax increase will have on SIA licence holders. The Chief Executive confirmed it would undoubtedly have an impact on the private security industry margins. It equally applies to the SIA itself; although the Home Office are expected to provide the SIA an update on the funding position for all its arms length bodies in advance of the finances being finalised in December 2024, for 2025-2026.
- 3.3 The Director of Inspections & Enforcement explained that labour exploitation continues to be an issue in the industry and is being tackled by Operation Empower. Companies are looking to move away from PAYE contracts, and the SIA is working with the Home Office on how to continue tackling this issue.

4. Updates on progress on significant Licensing and Standards related matters

- 4.1 The Principal Policy Advisor joined the meeting.

Home Office update on proposed changes to criminality and list of offences.

- 4.2 The Director of Licensing & Standards introduced the agenda item to the Board.
- 4.3 Following agreement to proposed changes at the SIA Board Meeting in June 2024, and the SIA's submission over the summer, it was understood the submission on the proposals to update the list of relevant offences in Get Licenced and revisions to how the SIA deals with criminality, specifically relating to sexual offences, child abuse and neglect, was made by Home Office officials to the Minister on [REDACTED]

[REDACTED]

[REDACTED]

- 4.4 The Home Office representative from the Public Protection Policy Team explained that the approval of the Minister was not formally required for the SIA to go out to consultation, however this time it has been sought to ensure that the SIA does not suggest something publicly that might not have the Minister's support.
- 4.5 The Chief Executive noted that any change to Get Licensed – which is the statutory licensing criteria - does require specific Ministerial approval.

Licence Dispensation Notices

- 4.6 The Director of Licensing and Standards reminded the Board of the decisions made by the SIA Board on 20 September 2024 to make changes to the Licence Dispensation Notice (LDNs) regime by ACS companies, namely:
- Restrict the use of LDNs to licence renewals only (not allow for new licence applications).
 - Reduce the duration of LDNs from ten weeks to five.
 - Require that the SIA are notified of when a first LDN is issued.
 - Require specific ACS authorisation to use the LDN facility; currently all ACS firms have the authority to authorise LDNs unless they opt-out. This will become an opt-in feature going forward.
- 4.7 The Director of Licensing and Standards confirmed that the SIA is on track to implement these changes on 17 February 2025. This is two weeks later than originally planned as the SIA has been working through some of the consequential detail of changes required to support these four enhancements.
- 4.8 Communications to ACS firms are due to be shared w/c 18 November 2024 explaining the changes and the SIA is planning webinars to be held in December 2024, where questions about the changes can be answered.
- 4.9 The Director of Licensing and Standards noted that some actions arose [REDACTED]
[REDACTED]
[REDACTED], including:
- Improving the knowledge and understanding amongst licensing staff of how the LDN regime works and the risks to be aware of with their use.
 - A restatement of the importance of appropriate and robust timelines being issues on cases especially when requesting information from applicants.

- Greater scrutiny and review of aged cases, which are down 20% since July 2024.
- Concerted effort to keep at and remain at full headcount of Customer Support Officers and Decision Officers, which has successfully seen the SIA recruit to its numbers and help with case management.

Refresher training

- 4.10 Following SIA Board approval on 25 July 2024, the SIA has progressed with new refresher training for Door Supervisors (DS) and Security Guards (SG). The new training became available on the 1 October 2024 and becomes mandatory for all DS and SG licence renewals from 1 April 2025.
- 4.11 The refresher qualification updates safety critical skills DS and SG use to keep the public safe and covers terror threat awareness, searching, vulnerability training and for DS content on how to spot and stop spiking and physical intervention skills. Accredited 'top-up' awards were introduced for DS and SG in October 2021 as a requirement for renewing licences.
- 4.12 The 'top-up' training will still be available until end of January 2025, and the SIA will be looking to make refresher training available for Close Protection licences in 2025, once their 'top-up' training rollout concludes in October 2025.

Get Licensed strategic assurance work

- 4.13 The Chief Executive commissioned an independent, external strategic assurance review of the licence criteria the SIA uses, specifically looking at two points:
- The core requirements of the current licensing criteria (covering identity, right to work, training and criminality)
 - The overall approach set out in the amended proposals for criminality (that are subject to ministerial approval and consultation).
- 4.14 Following a procurement process in September 2024, external expert consultants were appointed to undertake the work. They have undertaken a review of the SIA's current policies and procedures alongside planned changes. The preliminary report has been shared with the Director of Licensing and Standards, and most importantly concludes the SIA licensing core criteria is sufficiently robust and fit for purpose.

4.15 The report highlights that a number of pieces of research, which identify a number of items for the SIA consideration. The Director of Licensing and Standards has yet to receive the completed report, and will share the findings of the report with Board members. The Home Office representative from the Public Protection Policy Team noted that any recommendations from the report would be really helpful to see.

5. Update on progress on SIA requests for changes to existing PSIA powers

5.1 The SIA Chair introduced the agenda item noting the changes the SIA has requested to its Private Security Industry Act 2001 powers.

5.2 The Principal Policy Advisor noted five key highlights:

- Ongoing dialogue with the Home Office Public Protection Unit on a range of areas where the SIA should be seeking wider powers, in line with a recommendation from the Public Bodies Review.
- Proceeds of Crime Act powers, which were obtained in 2024.
- Progress on the Investigatory Powers Act with Home Office support for a business case which has gone to the Investigatory Powers Commissioner's Office.
- Powers of entry and the HMRC information sharing gateway agreement – policy agreement with Home Office officials on what powers are needed.
- A discussion on Regulation of Investigatory Powers Act powers was held with the Home Office Public Protection Unit to agree to work together to develop case studies for a business case to go to Ministers.

5.3 The representative from the Home Office Public Protection Unit noted the hard work their team, and the SIA team have put in to making this case [REDACTED]

5.4 The Chair thanked the team for all their hard work.

5.5 A NED Board Member and the Principal Policy Advisor left the meeting.

6. External Communications mid-year report

- 6.1 The Head of Communications joined the meeting, the Senior Manager for Industry Engagement, the Investigations Officer and the Performance Improvement and Support Manager joined the meeting.
- 6.2 The Head of Communications presented her report, noting five highlights:
- Public Safety Campaigns which included the summer festival season and winter season.
 - Communications inbox for Operation Empower and Operation Benchmark, with more details available at the end of the year.
 - A new internal graphic designer who joined the SIA in April 2024. This is an 'invest to save' post and the SIA has managed to save in excess of £30,000 by bringing expertise in-house.
 - Promotion of current work undertaken by the SIA as regulator, and correcting misinformation and misunderstandings – myth busters.
 - Development of the SIA brand for 2025-26.
- 6.3 A NED Board Member noted the breadth of engagement the SIA is currently having, and queried how the SIA will engage the public more widely. The Head of Communications noted that a discussion was taking place on a refreshed engagement strategy with the intention of bringing this back to the SIA Board in 2025.

7. Twice yearly Board Stakeholder engagement strategy (Industry/Special Interest group) update

- 7.1 The Senior Manager for Industry Engagement presented the Stakeholder Engagement Strategy update to the Board, noting that as set out in the current strategy that its core objective is to continually improve how the SIA engages with stakeholders across all aspects of the business.
- 7.2 The Senior Manager for Industry Engagement noted that four special interest groups (SIGs) had been established where the SIA listens to stakeholder views and feedback. It was added that in addition to the SIGS that the SIA holds three stakeholder forums per year to disseminate feedback from the meetings and strengthen the SIA's joint working with the industry.
- 7.3 A stakeholder engagement plan along with the Communications Team is being developed by the Head of Communications for 2025.

ACTION 14-NOV-24-01: The Director of Licensing & Standards to consider as part of business planning whether a new SIG should be formed aimed buyers of security.

7.4 The Head of Communications, the Senior Manager for Industry Engagement, the Investigations Officer and the Performance Improvement Support Manager left the meeting.

8. Q2 Finance Report

8.1 The Director of Corporate Services presented the Q2 Finance Report in the Head of Finance & Procurement's absence, which was noted.

8.2 Total expenditure for the period ending P6 YTD is £17.4m, which is £0.4m over budget and £0.6m below forecast.

[REDACTED]

[REDACTED]

8.5 She noted that the original budget was set back in December 2023 against data at that time on volumes, now almost a year old. She also drew attention to the positive narrative around how the additional costs due to increase in Disclosure and Barring Service charges had been consumed by efficiencies made by the SIA.

9. Performance

2024/5 Q2 KPI dashboard and quarterly performance report

9.1 The Head of Corporate Information, Senior Data Analyst and Strategy & Planning Manager joined the meeting.

9.2 The Senior Data Analyst presented the quarter 2 dashboard alongside the key performance indicators (KPIs) and summaries the key highlights.

9.3 The Home Office Sponsorship Unit representative noted that despite the high level of demand, the SIA met its KPI 8a target, 85% of all complex individual licence applications decisions made within 25 working days. The Chief Executive commented that this target could not tighten further due to being reliant on external partners to process these cases.

Initial Discussion/confirmation on top level 11 KPIs for Business Plan 2025/26

9.4 The Head of Corporate Information informed the Board that the proposal was the same set of KPIs from 2024-25 will be used for the next Business Planning year in line with NAO best practice guidance. The Board were content with that proposal.

9.5 She noted that the Corporate Information Team wants to discuss a fresh set of KPIs for the next Corporate Strategy period from 2026 – 2029.

ACTION: 14-NOV-24-02: The Head of Corporate Information to lead a Key Performance Indicator session as part of the Board strategy days in Autumn 2025

9.6 The Head of Corporate Information and Senior Data Analyst left the meeting.

Business plan for 2024/25 Q2 performance report

9.7 The Strategy & Planning Manager reported on the SIA's performance for quarter 2 against the 2024 – 2025 business plan, which the Board was asked to note.



9.9 The Chair queried the status of the creation of guidance for the adoption of a standard on labour supply in the current ACS. The Director of Licensing & Standards noted that a British standard initiative is being developed by third parties, and the SIA will review this once that external initiative has been completed.

9.10 The Strategy & Planning Manager left the meeting.

[REDACTED]

10.7 The Interim Director of Transformation noted that the SIA has encountered a delta between the full business requirements identified in the discovery phase and the contract.

10.8 The Interim Director of Transformation added that it is now clear that the baseline plan agreed in the contract previously is overly optimistic and builds in additional risks (for example, projects running in parallel and to the exact same timescales, with no gaps between phases). The SIA has conducted a lessons learned with Version 1 on the discovery and alpha phases of the ORP and have a further session planned for later this month. The Interim Director of Transformation has put together a set of activities to get the programme on a more solid footing moving forward which will be expedited over the next three months. New work will not commence until that is complete. The programme priorities are CDP and Org CRM and on the broader IT front, remediation of issues identified in the IT Health Check, rollout of the Manage, Detect, Respond contract across the entire IT estate, integration of the new HMPO API which is key for licensing and required by February 2025. The last of these had not been part of this year's original plan, given moving deadlines from HMPO over a number of years.

10.9 The Interim Director of Transformation noted her and the team's frustrations about being behind where planned, but acknowledged the importance of acknowledging the reality of the situation and remedying it so it can be delivered going forward for the SIA workforce and external customers.

10.10 The Interim Director of Transformation noted the next steps:

- Complete the lessons learned on "org portal" so far

- Establish and embed sound infrastructure for the programme which includes a detailed programme plan, agreed governance and ways of working across the external contractor.
- Appointment and training of project executives.
- Work through the proposals on organisation portal and licence checker to inform plans for the remainder of the year and the Home Office capital bid.

10.11 A NED Board Member queried what the financial cost difference was to deliver the ORP. The Interim Director of Transformation noted that there was a £2 million disparity.

10.12 The Interim Director of Transformation confirmed that she is working with the Home Office's Data, Digital and Technology (DDAT) team for support.

ACTION: 14-NOV-24:03: Follow up Home Office Sponsorship Unit support to helping the SIA with issues in recruitment of programme management resource for Data and Digital programmes.

10.13 The Head of Estates and Digital Transformation Lead left the meeting.

11. Business Approval Scheme Programme Update

11.1 The Director of Licensing & Standards presented the paper, which was an update on delivering the business approval scheme programme. He reported that in September 2024, the team received approval from the BAS Programme Board to proceed to Phase 2, where the detailed scheme design would be created ready for a second public consultation. The plan included scoping and drafting the specifications for the Acceptance Criteria (Mandatory) and Approval Types, focusing on Specialist Sectors as well as outline Eligibility Criteria.

11.2 The Director of Corporate Services noted that they had met with the Government Internal Audit Agency (GIAA) about a consultancy audit for BAS, and it would be beneficial to provide a second line assurance update later in 2025 through ARAC.

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 six-month temporary change of the quality assurance team from Individual Standards to the Inspections & Enforcement directorate to support Operation Benchmark, and the ongoing recruitment of Customer Support Officers and Decision Officers.

13. Inspections and Enforcement Forward Look Report

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

13.2 The Director of Inspections & Enforcement highlighted four key things:

- The inspection activity KPI had been met, due to the significant amount of work done during the festival season.

█ [REDACTED]

█ [REDACTED]

- Work focus continues on Violence Against Women and Girls, and the team were attending a summit the Minister had called on 20 November 2024.

13.3 A NED Board Member queried what the key themes of the training centres that were being closed down were. The Director of Inspections & Enforcement noted that governance around training centres was not tight enough.

14. Audit, Risk and Assurance Committee update

14.1 A NED Board Member and ARAC Chair provided an update on the SIA Audit Risk and Assurance Committee to the SIA Board.

14.2 The ARAC Chair informed the Board, that ARAC recommended to the Board that the Annual Reports and Accounts should be approved. The annual accounts and reports had been considered by ARAC in October and subsequently agreed by correspondence by ARAC and the remaining Board Members, enabling the Chief Executive to sign the annual accounts and reports

and for the document to be laid in Parliament during the week commencing the 25th November 2024.

14.3 The ARAC Chair noted that the GIAA audit on Disaster Recovery, which received a limited rating. The Interim Director of Transformation confirmed that a Disaster Recovery re-test was scheduled for November, however it could not be done due to HMPO availability issues, therefore this has had to be postponed until January.

15. People Committee Meeting update

15.1 A NED Board Member provided an update in place of the People Committee Chair to the SIA Board, noting the meeting's focus on the annual pay remit, and the SIA's Strategic Workforce Plan.

15.2 A NED Board Member noted a consideration will need to be placed on the incoming Martyn's Law Regulator legislation in 2025, therefore the SIA People Strategy has been extended for another 18 months to consider the impact of this.

16. Equality, Diversity and Inclusion update

16.1 The Chief Executive provided a verbal update to the SIA Board, noting the next meeting which is scheduled on 18 November 2024.

17. Any Other Business

17.1 Zoe Billingham, Non-executive Director and People Committee Chair is leaving the SIA, and the Chair thanked her for hard work and service.

17.2 Natalie Benton, Executive Director of Corporate Services is leaving the SIA after 3 years. On behalf of the Board and the SIA, the Chair thanked her for all her hard work and service.

17.3 She also drew attention to two other executive staff leavers who the Board had worked closely with. Jeremy Bennett, Head of Legal Services & Policy and General Counsel has left the SIA, the Chair thanking him for his work. Nick Hill, Governance Manager is leaving the SIA, and the Chair thanked him for his hard work and service.

17.4 The Chair noted the next SIA Board Strategy Day was on 26 November 2024.

Next Meeting: Thursday 6 February 2025