

Title	Minutes of the Board Meeting
Description	Minutes of the Board Meeting held 6 November 2025
Paper owner	Heather Baily
Paper author	Ben Kirkham
Meeting date	5 February 2026

The Board is invited to approve these minutes.

Board members wishing to request clarification on a paper should contact the paper's owner in advance of the meeting (preferably by email). Material responses to the requests will normally be circulated to all Board members prior to, or at, the meeting.

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.

There are elements of these minutes that should not be released due to their nature and using exemptions under the following:

Action Item S35 – Policy development and S41 Information provided in confidence (text referring to Minister writing to another Minister)

Item 4: Home Office Update. S35 – Policy development (timelines on Home Office statutory guidance). S41 – Information provided in confidence (funding negotiations, HMRC gateways).

Item 5: Improving SIA inspections and enforcement regime. S35 – Formation of Governance Policy (new powers, appeals reform, whistleblowing powers). S41 – Information provided in confidence (HMRC discussions).

Item 9: Financial Report. S41 – Information provided in confidence.

Item 11.2: Digital and Data Programme Update - S43 – Commercially sensitive.

Item 16.3: ARAC Quarterly Review – subject to live proceedings

Minutes of the Board Meeting on 6 November 2025

Date: 6 November 2025

Time: 11.00-16:00

Location: 10 South Colonnade, London (in person)

Chair: Heather Baily

Attendees:

Caroline Corby, NED Board member
Duncan Worsell, NED Board member
Hannah Wadey, NED Board member
Sarah Pumfrett, NED Board member
Steve Grainger, NED Board member (afternoon only)

Michelle Russell, Chief Executive and Board member
Debbie Bartlett, Chief Operating Officer and Board member
Pete Easterbrook, Interim Executive Director of Inspections and Enforcement and Board member
Phil Urquhart, Chief Digital and Data Officer and Board member
Tim Archer, Executive Director of Licensing and Standards and Board member

Nicola Podd, Head of Strategy & Governance and Chief of Staff
Ben Kirkham, Governance Manager (secretariat)
Alero Harrison, Head of External Communications

[REDACTED] Head of Licensing and Service Delivery (item 6)
[REDACTED] Senior Lead of Licensing Operations (item 6)
[REDACTED] Senior Manager Customer Support (item 6)
[REDACTED] Design and Delivery Lead (item 7)
[REDACTED] Head of Finance and Procurement (item 9 and 11)
[REDACTED] Senior Manager Industry and Engagement (item 10)
[REDACTED] Research Lead (item 10)
[REDACTED] Digital Transformation Lead (item 11)

External observers:

Tom Ball, cover Deputy Director of Protect and Prepare, Homeland Security Group, Home Office

Invited Presenters:

Sarah Jane Cork, CEO & Founder, Milieu Associates and Co-Chair of SIA Buyers SIG (item 10)
Jayne King, Head of Security & Site Services, Guy's and St Thomas' NHS Foundation Trust and Co-Chair of SIA Buyers SIG (item 10)

Apologies:

Paul Glibbery, NED Board member
Olivia Halfacre, Board Apprentice

Ronnie Megaughin, Interim Director Martyn's Law, and Board member
Shaun Hipgrave, Director, Protect and Prepare, Homeland Security Group, Home
Office

Niall Donnelly, Head of Safeguarding Sponsorship, Home Office

Jodie Gibson, Head of Home Office Sponsorship Unit, Home Office

1. Welcome, apologies, declaration of interest, minutes of previous meeting, matters arising.

Welcome and apologies.

- 1.1 The Chair welcomed the Board attendees to the last Board meeting of the year and extended a warm welcome to the cover Deputy Director of Protect and Prepare, Homeland Security Group, Home Office and to Sarah Pumfrett, the new Non-executive director.
- 1.2 There were apologies given from Paul Glibbery; NED Board member, Olivia Halfacre, Board Apprentice; Ronnie Megaughin, Interim Director Martyn's Law and Board member; Niall Donnelly, Head of Safeguarding Sponsorship, Home Office; Jodie Gibson, Head of Home Office Sponsorship Unit, Home Office and Shaun Hipgrave, Director, Protect and Prepare, Homeland Security Group, Home Office.
- 1.3 The meeting was confirmed as quorate.

Declarations of interest

- 1.4 There were no new declarations of interest made.

Minutes of previous meetings.

- 1.5 The Board was asked to consider two sets of minutes for approval:
 - The Board meeting held on 23 July 2025, and
 - The extraordinary meeting held at the Board Strategy session on 9 October 2025, during which the Board entered a formal session in the afternoon to make some time critical decisions.

Two observations were noted:

- The date of one of the meetings required correction.
- Under the Board Risk Appetite Review section, it was clarified that the Chair has asked the Board to approve two items:
 - Agreement to postpone the review of the Board Risk Appetite Statement until April 2026.
 - Confirmation that no members had observations or concerns regarding use of the current risk appetite and gradings.

The Board confirmed both points and approved the minutes.

Matters Arising.

Action: July-25-01 Annual Licensing Fee, determination was made on the 9 October, business case has been sent to the Home Office. Action is to be closed.

Action: July-25-03 Close Protection Licensing Recommendations; the changes to the mandatory training had been agreed and gone live. Action is to be closed.

Action: May-25-01 The Home Office agreed inclusion of SIA-relevant questions in the next public survey; a written update has been received but a fuller update is awaited from the Home Office at the February Board. Action ongoing and to come back to February Board meeting.

[REDACTED]

Action: Feb-24-03 Home Office are prioritising the preparations for a consultation on MR7 and MR8. As a result, there is no further update on the Bailey recommendations for enhanced checks. Home Office intend to return to this once the MR7 and MR8 consultation is underway, in the New Year. Agreement is yet to be reached on who will lead on a consultation for this; Home Office or SIA. Action ongoing.

[REDACTED]

2. Chair's report.

- 2.1 The Chair noted the range of activities since the previous meeting report in July. Key updates included:
- 2.2 Ministerial Engagement: The Security Minister visited the SIA at the end of July. A schedule of proposed future meetings has been agreed, with the next planned for November [this was subsequently moved and then cancelled].
- 2.3 The Chair expressed gratitude to executives who joined her for meetings in Northern Ireland, noting productive discussions that focussed on Ministerial priorities to inform the next corporate strategy and the potential impact of Martyn's Law regulatory functions in Northern Ireland.
- 2.4 Regional Engagement: The Chair expressed gratitude to the executives who joined her for meetings with government officials in Northern Ireland in August, noting productive discussions that focussed on Ministerial priorities to inform the next corporate strategy and the potential impact of SIA's Martyn's Law regulatory functions. This followed a previous visit to Scotland in early July.
- 2.5 The Chair also met with ACC Jenny Gilmer, South Wales police, and NPCC lead for private security. These meetings focused on strengthening local

engagement, understanding regional security priorities, and sharing insights on SIA initiatives and regulatory developments.

- 2.6 Board Strategy days: Updates were provided on the sessions held in September and October 2025, where the Board discussed and agreed the SIA's purpose, and strategic priorities, and the SIA's request for a proposed name change. The sessions also explored high-level planning for future regulatory and operational focus.
- 2.7 Training Malpractice: The Board strategy session also covered discussions on the SIA's new response to training malpractice. An update is on the agenda, at item 13, which includes updates on ongoing work to review qualifications, monitor compliance, and mitigate risks within training providers
- 2.8 Non-executive director membership: The Chair drew attention to Annex A, setting out proposed changes to Non-executive director responsibilities on committees, in addition noting Sarah Pumfrett taking on the role of Chair of the Audit and Risk Assurance Committee.

3. Chief Executive's Update.

- 3.1 The Chief Executive provided an update on key developments, noting that more detailed discussion on volumes, finance, and Digital and Data risks would follow under agenda items 9 and 11.
- 3.2 The establishment of the new Security Industry Leaders Group – known as the “S12” group was highlighted, The Security Minister had asked the security industry to organise its engagement with him into one group who could speak with an ~~one~~ unified industry voice for the purpose of communicating with government. With renewed momentum to review and progress a number of legislative and policy changes the SIA has long asked for, and which will require industry support, Government hearing that support directly from the industry will be helpful.
- 3.3 If it will also become a body that takes greater leadership and overdue accountability on matters the industry itself should change and lead on, including for example on in employment training and on exploitation in labour provision.
- 3.4 The SIA's strategic review of security licence qualifications was launched the previous day. The Chief Executive also reported her recent engagement with the Chief Regulator and Ofqual and her attendance at their recent fraud summit for public bodies with an interest in regulated qualifications. At the Ofqual summit it was acknowledged that training malpractice is not unique to the sector providing training and qualifications for security. In the absence of Ofsted oversight, the SIA has had to assume responsibility to address the regulatory gap. Capacity and capability challenges within Ofqual were also noted as potential risks.
- 3.5 The strategic risks were highlighted, reporting that a new strategic risk had been created reflecting the significant volume and nature of concurrent organisational changes underway and the potential for cumulative impact on capacity. The creation of this new risk was supported.

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6. Customer Satisfaction Annual Survey 2025 results.

- 6.1 The Chair welcomed the Head of Licensing and Service Delivery, the Senior Lead for Licensing Operations, and the Senior Manager, Customer Support, to present the 2025 Customer Satisfaction Survey results.
- 6.2 In summary they explained that the survey engaged 741 individual applicants and 59 employers. Overall satisfaction remained high, with 89% of individuals and 93% of employers satisfied—the latter being the highest employer satisfaction recorded. The slight decline among individual applicants was concentrated in renewal applications, linked to mandatory refresher training introduced in April 2025.
- 6.3 Key drivers of satisfaction included clear guidance, prompt responses, fair decisions, and updates on application progress. Negative feedback primarily concerned licence pricing, processing delays, and difficulty understanding requirements. Employer satisfaction remained strong, with minor concerns over awareness of the business helpline.
- 6.4 Recent operational improvements, including a new phone system and plans for a CRM People Portal and eligibility checker, are expected to further enhance service. The instructional online application video has been viewed 149,000 times, and 83% of respondents found the decision timescale

indicator useful. The SIA is also exploring digital ID verification options to reduce Post Office visits.

- 6.5 The Chair also noted and welcomed the SIA publication of *Setting the Record Straight*, clarifying licence fee allocation. The Chief Executive and Executive Director of Licensing and Standards commended the team for professionalism, resilience, and strong results. Survey feedback indicated that operational challenges, such as right-to-work issues, had limited impact on overall satisfaction.
- 6.6 The next survey is scheduled for May–July 2026. It was noted this one was slightly later than usual. The Chair thanked the Licensing team for their work and the excellent survey outcomes.
- 6.7 The Head of Licensing and Service Delivery, the Senior Lead for Licensing Operations, and the Senior Manager, Customer Support, all left the meeting.

7. Business Approval Scheme programme and Business Licensing Proposals Update.

- 7.1 The Chair invited the Executive Director of Licensing and Standards to provide an update on the Business Approval Scheme (BAS) and Business Licensing proposals. The Executive Director was joined by the Design and Delivery Lead.
- 7.2 Progress on the BAS redesign was reported as positive, with the scheme now rated amber, reflecting completion, circulation, and a governance review of key design components. The revised scheme proposals have been shared with external stakeholders through focus groups with around fifty representatives, with plans for public consultation on the detailed design in Spring 2026. The team is benefiting from expertise from both the new Design and Delivery Lead with expertise in the industry and the SIA's own Approved Contractor Scheme (ACS) team, with additional resources being considered to accelerate work before consultation.
- 7.3 Stakeholder testing is being expanded to include an advisory group, and a communications plan is being developed, including social media updates and a “teaser” campaign to raise awareness. The draft BAS model includes eligibility criteria that can adjust depending on the final scope of any mandatory Business Licensing introduced by the Home Office. The BAS is designed to complement Business Licensing, adopting a lighter threshold if licensing is more stringent, and features quality assessment levels. Early stakeholder feedback was broadly supportive, with questions raised about market supply, demand, and engagement with small businesses.
- 7.4 The Chief Executive highlighted the need for clear communication to avoid confusion between BAS and Business Licensing, emphasising that BAS remains optional and complementary. Feedback from small businesses in the stakeholder community has been consistently positive. The Deputy Director of Protect and Prepare, Home Office, noted the importance of coordinated messaging to prevent consultation fatigue.

7.5 The Chair thanked the presenters and stressed the need for proactive communications, noting that in the absence of clarity, speculation can quickly fill the gap. No further questions were raised.

8. Martyn’s Law Delivery Programme Update.

8.1 The Chair invited the Head of Strategy and Governance, Chief of Staff, to provide an update on the Martyn’s Law Delivery Programme in the absence of the Interim Director.

8.2 The Head of Strategy and Governance reported that with the new managed service provider (MSP) in place, future reports will give a clearer view of progress against milestones, risks, and issues, supported by an integrated programme plan mapping timelines, milestones, and decision points. The programme continues under high scrutiny internally and by the Home Office, with the next Delivery Board and committee meetings scheduled including a deep dive on technology dependencies.

8.3 Key milestones include consultation on Section 12 guidance, with guidance development and review front-loaded, and ongoing stakeholder engagement. Alignment with Home Office guidance publication in 2026 remains critical, with preparatory work underway to ensure SIA consultation aligns with the Home Office schedule. Sequencing of consultations is being carefully managed to maintain clear and consistent messaging.

8.4 The Chief Executive highlighted two key risks from her perspective that needed closely managing: the potential “cliff-edge” impact in March as a result of the contract with the MSP drawing to a close, and the tight procurement/funding timelines for digital systems build and an essential timeline for go-live in April 2027. A Non-Executive Director suggested exploring shared learning with Disclosure Scotland regarding their system implementation challenges, which the Chair agreed would be valuable.

[REDACTED]



10. Stakeholder and Communications.


- 10.1 The Chair welcomed to the Board and introduced external presenters for the Buyers' Special Interest Group (SIG) initiative both co-Chairs of the SIG: Sarah Jane Cork (CEO, Milieu Associates), Jayne King (Head of Security, Guy's & St Thomas' NHS Foundation Trust), and the SIA Research Lead.
- 10.2 Sarah Cork explained that the Buyers' SIG brings together experts from procurement, security, insurance, and public bodies to develop a Buyers' Charter, promoting quality-weighted procurement and shared standards across sectors. Early feedback identified technology, people, and physical measures as core elements of good security. The initiative is cross-sectoral, with broad engagement from public and private organisations. Initial SIG meetings have been held, with ongoing work including logo approval, LinkedIn presence, working groups, and phased implementation through 2026. The Charter will also address risks such as major incidents, reputational damage, and public perception. Board members and executives highlighted the importance of clear communication, case studies to illustrate procurement impacts, and alignment with SIA strategic objectives.
- 10.3 The Chair then invited the Head of External Communications to update on stakeholder engagement and communications. Key points included planning for three upcoming consultations (Business Approval Scheme, Section 12 guidance, and Skills and Qualifications Review), proactive management of training malpractice updates, and engagement with Special Interest Groups to

shape the narrative. Over the coming months, three-year Communications and Stakeholder Engagement Strategies will be developed to align with the new three year Corporate Plan, with emerging drafts presented at the February Board meeting. Recruitment is underway for two senior communications roles to support these functions.

- 10.4 The Chair thanked all presenters for their contributions and engagement, and the presenters left the meeting.

11. Digital and Data Programme Update

- 11.1 The Chair welcomed the Digital Transformation Lead and Chief Data and Digital Officer to provide an update on the People Portal and People CRM projects. The Chief Digital and Data Officer confirmed that the original delivery baseline from October 2024 was not achievable; following replanning, delivery is now expected by September/October 2026. This delay has implications for capital budgets and overall programme timelines.

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- 11.3 The Digital Transformation Lead confirmed that key elements of the People Portal and CRM work will be delivered by March 2026, with rigorous due diligence on payments tied to deliverables, which is why capital payments phasing is late in the financial year. Due to contractor delays on the People Portal/CRM programme the Programme is forecasting a £700k underspend, which has been notified to Home Office. OneLogin ID continue to pose challenges for high-confidence DBS verification; One Login has confirmed it is not fit for purpose for High Confidence checks by GDS until March 2027 earliest; alternative solutions are being explored, with expected compliance by October 2026.
- 11.4 The Licence Checker remains a Board priority for delivery, with a new “Report on Primary Concerns” feature added. In response to a question, the Chief Data and Digital Officer noted that the current fixed-price contract with the supplier does not include financial penalties for delays, highlighting lessons for future procurement. The contract comprises transformation/project delivery and business-as-usual/managed services, the latter performing well, with an optional one-year extension to be considered within the next ten months.

- 11.5 No further questions were raised, and the Chair thanked the team for their update. The Digital Transformation Lead left the meeting.

12. Performance Report.

- 12.1 The Chair introduced the Q2 KPI Dashboard and Business Plan performance report, and opening the item for questions.
- 12.2 A Non-Executive Director queried why KPI 6 was not being met. The Director confirmed that KPI 6 is under review and will be adjusted in the next planning cycle to reflect intelligence-led priorities, though it will remain unchanged for the remainder of the year. Another NED questioned whether some KPIs were too easily achieved as so many were green; the Chair noted that targets would not change this year but that discussions are ongoing for the next Corporate Plan.
- 12.3 The Chief Executive cautioned against interpreting green as easily achieved. KPIs were prioritised ahead of business plan deliverables. She also highlighted for example, ongoing challenges with KPI 8a (85% of complex individual licence application decisions within 25 working days), which is heavily dependent on external vetting sources. The Chair then invited questions on Business Plan progress; none were raised.

13. Licensing and Standards quarterly forward look including updates on tightening up SIA's licensing criteria (including qualifications).

- 13.1 The Director of Licensing and Standards highlighted key points before taking questions.
- 13.2 Application volumes remain below forecast – he highlighted in particular student visas (-15%) and dependent visas (-60%), reflecting 2024 Government policy changes on right-to-work, visas and immigration policy. Overall volumes for the first half of the year remain similar to the same lower year at the same stage of the three year cycle, three years ago. The Chair asked whether Operation Resolute was affecting volumes; the Director of Licensing and Standards confirmed that no single factor is driving the change. A Non-executive director noted the operational implications if volumes had remained high; the Chief Operating Officer confirmed absolute numbers are relatively small, so impact on teams' size is limited.
- 13.3 Updates were provided on Bailey Enhanced Review, MR7, and MR8. MR7 remains part of the upcoming consultation, which will include the SIA's recommendations to extend this also to SG licences, and options for sector-wide rollout. Changes agreed to Get Licensed criteria (effective 1 December) are being implemented, with teams preparing to apply the new criteria.

- 13.4 The strategic review of qualifications has launched as part of the SIA's new five-point plan on training malpractice. The review covers qualification levels, first aid, English language requirements, and the broader assessment regime. Stakeholder engagement is underway, with emerging proposals expected for discussion for the February/ March Board meeting, and consultation in spring 2026, and new qualifications launching in spring 2027. A summit with awarding organisation Chief Executive Officer is scheduled for 18 November to discuss their solutions to address the "vulnerability gap."
- 13.5 Changes to Licence Dispensation Notices within the ACS scheme have been reviewed after 6 months as planned and the associated risks now closed, demonstrating effective risk management. The Chair asked about the impact of now accessing non-conviction data from Disclosure Scotland; the Director confirmed 3,948 disclosures have been received from Disclosure Scotland, with only six containing additional information not seen before, and mostly already known to SIA from other routes.
- 13.6 The Chair thanked the Director for the comprehensive report.

14. Inspection and Enforcement quarterly forward look report.

- 14.1 The Interim Director of Inspection and Enforcement introduced the paper, highlighting key points on Operation Resolute and the engagement with Ofqual. Capacity and capability limitations at Ofqual were noted, as they regulate awarding organisations but not training centres. Progress has been made in Ofqual recognising SIA licence-linked qualifications as higher-risk, with strengthened engagement, including involvement from the Chief Regulator.
- 14.2 SIA inspections of training centres have commenced using existing investigative staff, doubling inspection volumes without additional resources. Insights from Operation Resolute are informing the strategic review of qualifications, particularly around malpractice and qualification fraud. A recent intelligence-led intervention resulted in the suspension of 60 licences and closure of a training centre within 24 hours, demonstrating operational agility. Investigative resources are being realigned to engage directly with new licence holders on a risk-led basis, with particular attention to English language proficiency.
- 14.3 The team's general inspection work and methodology continue to expand beyond the night-time economy to sectors such as healthcare, transport, retail, and national infrastructure, supported by the pilot heat map. Updates were provided on Project Occupation, targeting misuse of Tier 2 visas, and progress toward SIA access to the Law Enforcement Database to streamline criminal information checks.

- 14.4 The Chair commended the investigations team for a high-profile case, noting convictions and asset recovery benefiting approximately fifty victims, and highlighted successful joint work with Hampshire Constabulary on reducing violence. NEDs queried whether inspection outcomes could be extrapolated and how historical cases are managed; the Executive Director confirmed that findings are not indicative of the wider landscape and that Ofqual oversight ensures learners are not unfairly disadvantaged, with arrangements in place for retakes and potential compensation.
- 14.5 The Chair thanked the Interim Director for the comprehensive update.

15. Board Effectiveness Report.

- 15.1 The Chair introduced the Board Effectiveness Report, noting this is the final year in the cycle an internal review can be undertaken. The Cabinet Office questionnaire, with minor modifications, formed the basis of the review. Thanks were given to the Governance Manager and Quality Assurance Manager for their work.
- 15.2 The Head of Strategy and Governance provided an overview of the outcomes and recommendations, highlighting incredibly positive scores and strong consensus, reflecting a well-established and effective Board. Areas flagged for improvement were largely based on one or two responses and should be interpreted cautiously. Recommendations were noted as either relating to better communication of existing processes (e.g., talent management, Executive succession planning) or genuine areas for strengthening.
- 15.3 Key points included continued support for Board diversity, the value of the apprentice scheme (returning in 2027), and recruitment focused on attracting diverse talent. Slide 7 of the report was discussed, covering recommendations on creative thinking space and post-evaluation review.
- 15.4 Non-Executive Directors commented that the report was fair and well-balanced. Previous effectiveness improvements were acknowledged, including structured agendas prioritising major items, adjusted meeting timings, and Board Strategy Days to encourage creative thinking. Suggestions included using external examples such as Board apprenticeships, observer programmes, and networks like Changing Chemistry to support diversity and innovation.
- 15.5 The Head of Strategy and Governance noted plans to re-promote the Board observer scheme and refresh communications to encourage participation and suggested using external facilitators to support innovative thinking. The Chief Executive supported this approach, proposing sessions with the NPSA and “show and tell” exercises, particularly in preparation for Martyn’s Law.

15.6 The Chair thanked colleagues for their contributions.

Action 06-11-25-01: All Board members to propose ideas for external facilitators for future creative thinking sessions for the next Board meeting.

16. ARAC Quarterly Review.

- 16.1 The ARAC Chair provided an update from the October meeting noting that the external audit was completed three months earlier than last marking a notable improvement.
- 16.2 Internal audit progress was slower than usual, but assurance was given that workloads will be caught up.



- 16.4 The Committee reviewed a government paper on early warning signs in public sector reports, generating useful action points. No questions were raised.

17. People Committee Quarterly Report.

- 17.1 The People Committee Chair updated the Board on the October meeting noting concerns over delays to completion of the sexual harassment policy were addressed; this is now progressing swiftly.
- 17.2 The Interim Director of Martyn's Law had provided a thorough update on the recruitment plan to the committee.
- 17.3 The staff survey achieved a 74% response rate, above the 61% benchmark, indicating strong engagement and a positive cultural picture.
- 17.4 HR restructure remains on track, with new staff joining and completion expected early in the new year.

18. EDI Committee update.

- 18.1 The EDI Chair reported from the July meeting that the Annual EDI Survey results were strong, though response rates had dipped. The Committee will review the frequency of pulse surveys.
- 18.2 Planned activities for National Inclusion Week were reviewed, with a follow-up at the February 2026 meeting.
- 18.3 Staff networks activity has dipped recently; the Head of Strategy and Governance and the Head of Estates and Project Executive will explore ways to re-energise and support the networks.

- 18.4 The three-year EDI plan remains on track, with a new update plan expected next year.

19.AOB

- 19.1 The new Non-executive director thanked the Board for the warm welcome and praised the quality and structure of papers and appendices.
- 19.2 The cover Deputy Director of Protect and Prepare, Homeland Security Group, Home Office commented on the helpfulness of the meeting in understanding the breadth of the SIA's work.

The meeting closed.

Date of next quarterly Board meeting: 5 February 2026