



# Guidance

*Promoting Excellence in Licensing.*



## Martyn's Law Guidance

Terrorism (Protection of Premises) Act 2025

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## FOREWORD

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At 10.31 pm on 22 May 2017, Salman Abedi detonated a bomb which was contained in a large rucksack which he was carrying. He did so in the City Room which is adjacent to Victoria Station and the Manchester Arena. He detonated his bomb as people were leaving a concert given by Ariana Grande attended by a large number of children. Tragically 22 people were killed many of whom were children. In addition to those killed, many, many people suffered injuries which have permanently affected their lives.

I was the Chairman of the Inquiry which investigated what had happened, why it happened and most importantly made recommendations to try and prevent anything like this happening again.

The first volume of my report set out what had happened and what had gone wrong. This was not the first attack of this kind in a large arena which is an obvious target for terrorists trying to kill as many people as they can.

I set out in that report numerous recommendations for large places of entertainment so as to make it much more difficult for a bomber to carry out a similar attack at a large place of entertainment.

Those recommendations are included as part of Martyn's Law, but Martyn's Law goes well beyond our recommendations.

Martyn Hett was one of those who needlessly died. His mother is a very determined lady called Figen Murray. Figen was concerned that what happened at the Arena could happen at much smaller premises and she worked tirelessly to persuade the Government that any law dealing with security at premises should apply more widely than the recommendations that I had made, which were only intended to apply to large arenas.

Through much hard work over a very long period of time, Figen succeeded and the result is Martyn's Law. It has been extremely difficult to draft the legislation because it is so wide ranging. Some still question whether it achieves the right balance between public safety and the freedom of the individual. Working out the details in practice and ensuring compliance will not be easy but it is vital that nothing like the Manchester Arena bombing ever happens again if it can be avoided.

Manchester remembers but the rest of the country may forget, so it is important we get it right before the tenth anniversary.

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The Hon. Sir John Saunders

## 1. Introduction and overview

### 1.1 Introduction

#### **Martyn's Law is not yet in force. It is due to come into force in 2027.**

The aim of this interim IoL guidance is to introduce members to the radical and important new regime created by The Terrorism (Protection of Premises) Act 2025 (otherwise known as Martyn's Law).

Although the legislation is not likely to come into effect until at least Spring 2027 the IoL is aware that there are a number of consultants and security companies offering to train businesses in relation to the Act – which seems somewhat ambitious given that even the SIA as regulator has yet to work out precisely how the measures should operate in practice! The Home Office have produced a 'Top Tips' infographic (included for information at [Appendix A](#)) which provides practical preparatory steps for organisations, such as reviewing existing security procedures, identifying responsible persons and making use of free counter-terrorism training. In the meantime, a cautious approach is recommended before procuring services which purport to ensure 'compliance' with the new provisions themselves.

The intention of our Guidance, which has no statutory or legal status, is that it should operate as a basic initial guide to what is known – and yet to be announced – in relation to this important new regime. It will be an evolving document, developing as we receive feedback from all quarters, whether it be operators, councils, police or members of the public. In that regard we feel that the IoL has a unique contribution to make, given the very extensive combined expertise of its membership.

At the same time, as the media routinely reports, 'bad actors' are unlikely to be guided by ministerial timetables. With that in mind we consider that it behoves everyone operating in the public realm, whether operator, enforcer or licensing authority, to be ever mindful even now of the potential for public harm. As Sir John Saunders has previously suggested, sensible practical steps can and should be taken immediately. Martyn's Law, when it is fully realised, will simply codify and bring into law much that should already be happening.

A further benefit of sharing and developing our own Guidance is that it will, we hope, highlight questions that need to be addressed in the statutory guidance due to be published separately by both the Home Office and the SIA under sections 12 and 27 of the Act.

The IoL has made it known to both bodies that it is keen to assist in the process with a view to achieving the best regulatory arrangements to deliver the intended outcomes whilst minimising burdens on both regulators and businesses.

## 1.2 Overview

The [Terrorism \(Protection of Premises\) Act 2025](#), also known as Martyn's Law, is designed to enhance public safety by requiring certain venues and events across the UK to prepare for and respond to potential terrorist attacks. The Act mandates that those responsible for qualifying premises and events take steps to reduce the risk of harm from terrorism.

### KEY FEATURES:

- **Qualifying Premises**

**Premises** that satisfy the following four criteria fall within scope of the Act:

- a) There is at least one building (or the premises are in a building);
- b) The premises are wholly or mainly used for one or more of the uses specified at Schedule 1 to the Act, e.g. a restaurant or a shop;
- c) It is reasonable to expect that at least 200 individuals may be present together at least occasionally; and
- d) The premises are not excluded under Schedule 2 to the Act

If 800 or more individuals may be expected together, the premises will be **enhanced duty premises** unless the Act says otherwise.

The infographic on Qualifying Premises (published by the Home Office in February 2026) is provided for information at **Appendix B**. Further guidance on calculating premises capacity is also available online<sup>1</sup>

For more detailed information on Premises please refer to the following factsheet: [Terrorism \(Protection of Premises\) Act 2025: Scope \(Premises\) - GOV.UK](#)

**Event - an event** that **satisfies** the following criteria falls within the scope of the Act:

- a) It will take place at premises within section 3(1)(a) of the Act, including land without buildings, that are not enhanced duty premises (or part of enhanced duty premises);
- b) The relevant premises are accessible to members of the public for the purpose of the event;

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<sup>1</sup> <https://www.gov.uk/government/publications/terrorism-protection-of-premises-act-2025-factsheets/terrorism-protection-of-premises-act-2025-assessment-of-the-number-of-individuals-expected-to-be-present-formerly-known-as-capacity-calculations>

- c) It is reasonable to expect that there will be at least 800 individuals present for the event at once at some point during the event;
- d) There will be measures to check entry conditions are met, such as a ticket checks; and
- e) The event is not excluded under Schedule 2 to the Act.

The infographic on Qualifying Events (published by the Home Office in February 2026) is provided for information at [Appendix C](#).

For more detailed information on Events please refer to the following factsheet: [Terrorism \(Protection of Premises\) Act 2025: Scope \(events\) - GOV.UK](#)

- **Implementation Period:**

The Act has a 24-month implementation period to allow venues and event organisers time to understand and prepare for their new obligations.

- **Statutory Guidance:**

The Home Office will publish statutory guidance to help those responsible understand the requirements of the Act.

- **Security Industry Authority (SIA):**

The SIA has been named as the new regulator, and will have regulatory oversight, with powers to assess compliance and take enforcement action.

The SIA will publish operational guidance which will set out how the regulator will discharge its duties under the Act.

- **Amendments to Licensing:**

The Act also makes amendments to the Licensing Act 2003 and the Licensing (Scotland) Act 2005 to prevent the misuse of information related to licensed premises for terrorist purposes.

### **1.3 Licensing laws across the UK**

Many qualifying premises, particularly enhanced duty premises, will also be subject to licensing regulation, including premises licensed for alcohol sales (hospitality and retail), entertainment, sports grounds, cinemas, theatres, etc.

Licensing regimes for alcohol and entertainment differ across England and Wales, Scotland and Northern Ireland. In each case, local authorities have a role, both in the administration and regulation of licensed premises, and will have established relationships with premises owners and / or managers, and a methodology for scheduling premises visits / inspections.

### 1.3..1 England and Wales

In England and Wales, alcohol and entertainment licensing is primarily governed by the Licensing Act 2003. This Act aims to create a clear framework for regulating the sale of alcohol, provision of regulated entertainment, and sale of late-night refreshments. It requires businesses and individuals to obtain licences for these activities (premises and personal licences). Every sale of alcohol must be authorised by a personal licence holder, and one individual (a personal licence holder) must be named as Designated Premises Supervisor (DPS), but that individual can be named DPS for more than one premises. Temporary Event Notices (TENs) can be used (subject to restrictions on capacity, duration and frequency) for occasional events.

There are exemptions for some types of premises (including vessels on international journeys, hovercraft, trains and aircraft on journeys, royal palaces.). There are multiple exceptions for public entertainment, where the entertainment is held between 8am and 11pm and complies with any specified conditions (e.g., audience size).

Where there are no objections to a premises licence, the licensing authority must grant the licence subject to relevant mandatory conditions and conditions which are consistent with the premises operating schedule (required as part of the application). There is no discretion for the licensing authority to add additional conditions unless the application is contested by way of objections, which can be made by any Responsible Authority or other person.

In the case of contested applications, the licensing authority must determine the application and additional conditions (or restrictions) can be added as considered appropriate and proportionate for the promotion of the licensing objectives (prevention of crime and disorder, public safety, prevention of public nuisance and protection of children from harm).

***Occupancy figures are unlikely to be included on a licence unless specified on the premises operation plan or considered appropriate as set out above.***

For the purposes of Martyn's Law, licensed premises will also need to factor in the numbers present in external areas connected with the operation of the premises that they have control over such as pavement licence areas, external smoking areas and entry queues.

A range of measures are available to operators in calculating the number of people who are expected to be present, including:

1. Safe occupancy (for fire safety purposes)
2. Historic attendance data
3. Fixed seating and/or standing.
4. Tickets and Pre-registration
5. Restrictions
6. Other means of assessing

### 1.3..2 Scotland

In Scotland, alcohol licensing is regulated by the Licensing (Scotland) Act 2005, administered by the Licensing Boards which operate as separate entities from local authorities (although they cover the same geographical area). Licensing Boards are responsible for setting policy and consulting with stakeholders including local licensing forums which are required to be set up in each authority area.

Each place where alcohol is to be sold requires a premises licence (or an occasional licence). Personal licences are issued to individuals and are required for authorising the sale and supply of alcohol. Licensed premises must have a 'Premises Manager' who holds a personal licence and individuals can only be 'Premises Manager' for one licensed premises.

Alcohol licensed premises with a full premises licence all have a capacity figure shown in their operating plan, which should have been calculated using the building standards technical handbook

An occasional licence can be granted for selling alcohol at normally unlicensed premises for temporary or limited period. Occasional licences are commonly used to provide pop up bars at unlicensed venues such a town and village halls, at markets, gala days and other temporary events held on normally unlicensed premises or places.

Local authorities are responsible for licensing public entertainment under the Civic Government (Scotland) Act 1982, and a Public Entertainment Licence (PEL) is required for premises or land used for public entertainment whether or not there is an entry charge, although certain events at places such as as athletic or sports grounds, educational establishments, religious premises, licensed premises, may be exempt. A PEL is not required for premises licensed for the sale of alcohol where the entertainment takes place during the hours the alcohol licence is in force. Those premises and places operating under an occasional licence may still require a PEL depending on the nature of the event.

Licensing authorities can attach conditions to PELs including restrictions on the nature of the entertainment, **limits on occupancy** and the days and hours of operation for public entertainment.

***This means that premises licensed for public entertainment will normally include an occupancy figure, calculated by combining Building Standards regulations, physical space assessments, event-specific considerations, and risk management principles.***

'Public Entertainment' is not defined in the 1982 Act, and local Authorities can set out through a resolution, the types of activities and types of venue that they consider to be in scope for this purpose. In Scotland Public entertainment is wide ranging and not just limited to live performances of music etc. It can include things like motorsport events, firework displays, and community events like galas days.

The existence of an occasional licence or temporary public entertainment licence may bring some premises or event into the scope of the Terrorism (Protection of Premises) Act, 2025.

### 1.3.3 Northern Ireland

In Northern Ireland, obtaining licences for alcohol and entertainment involves separate processes. An entertainment licence, required for public or private events, is obtained from the local district council.

A liquor licence, necessary for selling alcohol to the public or supplying it to members in registered clubs, is obtained from the County Court who may attach any conditions it thinks fit. The Police Service of Northern Ireland are responsible for enforcing the Licensing Order.

Public entertainment licensing is governed by the Local Government (Miscellaneous Provisions) (NI) Order 1985. District councils issue licences for places of public entertainment, including those used for private functions or events where a charge is made. Exemptions may apply for religious occasions and, in some circumstances, schools.

All entertainment licences are granted for a period of up to 12 months and are subject to standard conditions such as:

- days and hours of use (further permitted hours restrictions apply to (liquor) licensed premises which are also a place of public entertainment).
- the nature of entertainment which may be provided
- **occupancy figures.**

### 1.4 The Terrorism (Protection of Premises) Act 2025

The Terrorism (Protection of Premises) Act 2025 (commonly referred to as Martyn's Law), is intended to improve protective security and organisational preparedness across the UK.

The new Act requires certain premises and events to ensure steps have been taken to prepare for potential terrorist attacks and get ready to help keep people safe in the event of an attack. In addition, certain larger premises and events will be required to consider and, where appropriate, take steps to reduce their vulnerability to acts of terrorism.

The legislation establishes a tiered approach linked to the different uses of premises and the number of individuals it is reasonable to expect may be present at the same time at the particular premises or event.

Subject to other conditions, to be qualifying premises, 200 or more individuals (including staff) must, from time to time, be reasonably expected to be present at the same time in connection with one or more uses specified in the Act.

Where 800 or more individuals (including staff) may be reasonably expected at the premises from time to time, they will be enhanced duty premises unless the Act provides otherwise. Qualifying premises that do not meet this threshold will be standard duty premises.

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One of the conditions to be a qualifying event is that 800 or more individuals (including staff) may reasonably be expected to be present at the same time at some point during the event. Events beneath this threshold are not in scope.

[Section 3](#) examines public protection procedures and measures in more detail.

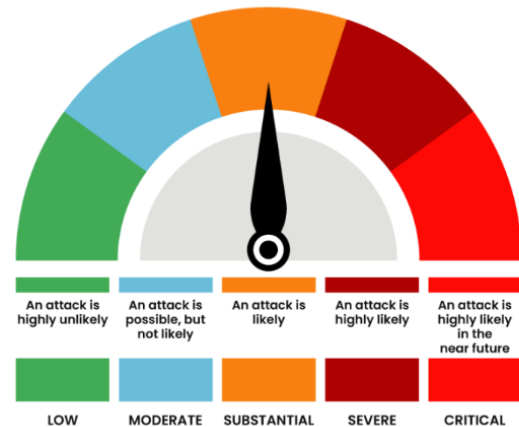
## 2. Current obligations and partnership collaboration

*Emphasising the importance of a joined-up approach and integration to avoid conflicting requirements and burdens on businesses and premises managers*

### 2.1 Current obligations

While the law received Royal Assent on April 3, 2025, it's currently in an implementation period of at least 24 months before coming into full effect in 2027. During this period, those responsible for venues and events are expected to understand their obligations and prepare accordingly, but full compliance with the Act is not yet required (note that other existing criminal and civil obligations to personnel and visitors will continue to apply irrespective).

The current (February 2026) threat to the UK (England, Wales, Scotland and Northern Ireland) from terrorism is **SUBSTANTIAL**<sup>2</sup>. Threat levels are designed to give a broad indication of the likelihood of a terrorist attack and can change at any time.



The threat of terrorist action is current, regardless of the status of Martyn's Law, and there are existing statutory obligations on premises and event managers to keep people safe. This includes Health and Safety at work legislation, while licensing laws in England, Wales and Scotland, carry objectives to prevent crime and disorder and to protect public safety.

Protect UK provides [Venues and public spaces \(VaPS\) Guidance](#)<sup>3</sup> which provides protective security advice in a number of sectors and scenarios. It has been developed through extensive research and analysis of previous incidents, and the assessment of current known threats. There are [training resources](#)<sup>4</sup> online for different sectors and roles.

### 2.2 QUESTIONS FOR LICENSING AUTHORITIES

So, what should licensing authorities be doing now? Given the current responsibilities under various licensing regimes, particularly the regulation of alcohol, entertainment, and gambling, clarity will be welcome on a number of questions. Examples include:

- Can terrorism-related conditions be attached to premises licences once the legislation comes into effect?

<sup>2</sup> <https://www.protectuk.police.uk/#:~:text=CURRENT%20NATIONAL%20THREAT%20LEVEL>

<sup>3</sup> <https://www.protectuk.police.uk/advice-and-guidance/risk/venues-and-public-spaces-vaps-guidance>

<sup>4</sup> <https://www.protectuk.police.uk/learning>

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- Can conditions extend beyond the requirements of the relevant tiers?
- What happens to existing terrorism-related conditions once the legislation comes into effect?

#### **Licensing Policies:**

Many licensing authorities may have existing sections of their Licensing Act 2003 Statement of Licensing Policy relevant to counter terrorism considerations for licensed premises. Authorities will need to review these policies considering the requirements of the Act and subsequent guidance.

Some licensing authorities have taken pro-active steps to consider counter terrorism measures ahead of the new provisions coming into force. Manchester is a good example of this as detailed below.

#### **2.3 Manchester City Council – a case study**

*Following the tragic Manchester Arena terror attack in 2017, at which 22 people lost their lives, Manchester City Council proactively took steps to embed the principles of Martyn's Law within the existing licensing framework to enhance and promote public safety in places and spaces where licensable activities take place in Manchester.*

##### **The challenge**

Martyn's Law aims to ensure that security preparedness is delivered consistently across the UK. Martyn's Law is likely to consist of five requirements:

1. A requirement that spaces and places to which the public have access engage with freely available counter-terrorism advice and training.
2. A requirement for those places to conduct vulnerability assessments of their operating places and spaces.
3. A requirement for those places to mitigate the risks created by the vulnerabilities.
4. A requirement for those places to have a counter-terrorism plan.
5. A requirement for local authorities to plan for the threat of terrorism.

##### **The solution**

Manchester council [successfully consulted on updating its model licensing conditions](#) for LA2003 licences and set standard conditions on its pavement licences to incorporate measures that give effect to Martyn's Law in licensed places and spaces. These conditions stipulate that:

- a. Certain members of staff must have completed [Action Counter Terrorism \(ACT\) Awareness e-learning training](#).
- b. Designated Premises Supervisors must have attended a counter-terrorism awareness training session.
- c. There must be a documented security assessment, which must incorporate counter terrorism measures for the premises.
- d. Within 28 days of the grant or variation of the licence, the premises licence holder shall evaluate any risks and take prompt steps to reduce the risk as far as is reasonably practicable.

- e. The premises must have a documented security plan, which sets out counter measures to be implemented in response to a terrorist attack.

These conditions were predominately volunteered in operating schedules, although responsible authorities did occasionally seek their inclusion through making representations where appropriate and proportionate with counter terrorism security measures being included as a key consideration of premises licence applications in the latest local LA2003 Statement of Licensing Policy.

Applicants for pavement licences are required to state what security measures will be in place, specifically considering matters such as the risk of hostile vehicles and the creation of large crowds in new public spaces, and the Licensing Team would consult with Counter Terrorism police officers in any cases of particular concern.

To support the training requirements, Manchester council worked with local Counter Terrorism police and business networks to deliver regular free in-person ACT Awareness training sessions with certification for attending the training.

The Licensing Team also co-ordinated the roll out of 100 free Publicly Accessible Trauma (PACT) kits across licensed premises in the city centre, several of which have subsequently been used in life-saving interventions following serious incidents. Whilst not necessarily terrorism-related, it highlights how Martyn's Law interacts with general public safety and security considerations for licensed premises and the night-time economy generally and this project is being expanded across wider areas of the city.

Manchester has also developed a 'Security of People and Premises' governance group overseeing:

- Martyn's Law – Ensuring proportionate protective security measures in venues and public spaces.
- Move to Critical (M2C) – Readiness to enact appropriate responses when the national threat levels escalate / de-escalate
- Systematic Assessment of Site Security (SASS) – Assessing and the strengthening security across the council estate.
- Public Space Protection Strategy (PSPS) – Securing public spaces against vehicle-based threats and hostile vehicle mitigation.

This group will lead multi-agency partnership working; bringing together various council departments including licensing and community safety teams, the police, counter terror police, and the highway authority, amongst others, to ensure the implementation of a coherent, aligned security framework for the Council and the Martyn's Law legislation.

### **The impact**

The response to Manchester's adoption of the principles behind Martyn's Law has been incredibly positive. Many businesses have adopted the measures on a voluntary basis, and more than 1,000 people and 500 venues have now taken part in the Action Counter Terrorism (ACT) training which aims to equip staff across the city with skills to identify and mitigate potential risks and respond in the event of a terror attack. There have also been several positive media releases about the council's work on this issue, which has helped to raise further awareness.

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**Lessons learned**

It is important to be familiar with the different guidance which supports councils' work on this issue. In particular, the [Protect UK website contains lots of useful information](#) such as a risk management template. There is also a [useful chapter on counter terrorism in the Purple Guide](#).

Manchester's work on Martyn's Law has led to improved engagement with venues, between council departments, and with partner agencies, across a range of safety and security matters. However, this increased collaboration can bring some challenges with costs and time.

Engagement with counter terrorism police is also key, as they can assist with identifying high profile areas, risks and whether there is a need for mitigation, as well as helping with emergency planning.

## 3. Public Protection procedures and measures

### 3.1 Qualifying premises (Section 2)

2. Premises will be “qualifying premises” if:

a. the premises consist of a building or a building and land

b. they are *wholly or mainly* used for one or more uses set out in Schedule 1 to the Act (e.g. for the sale of food and drink for consumption on the premises);

*NOTE [1]: where the premises are used for more than one such use, the relevant use will be the principal use.*

*NOTE [2]: Qualifying premises may be contained within other qualifying premises. For example, a shopping centre may be qualifying premises as might a retail unit within the centre (subject to Sch 1 & 2).*

c. it is ‘reasonable to expect that from time to time’ 200 or more individuals may be present on the premises at the same time, and;

d. the premises are not excluded by virtue of Schedule 2 to the Act

*NOTE [3]: Schedule 2 includes public parks & gardens, secure transport premises and premises mainly used for e.g. worship, childcare or primary, secondary or further education).*

Premises that qualify are split into two categories:

- Enhanced Duty premises - qualifying premises where it is reasonable to expect that they will, from time to time, host 800 or more individuals at the same time
- Standard Duty premises - qualifying premises reasonably expected to host between 200 and 799 individuals from time to time at the same time

Some qualifying premises that would *otherwise* be Enhanced Duty premises are to be treated as Standard Duty premises under Schedule 1 (e.g. even if they host 800+ persons ‘places of worship’ are to be treated as Standard Duty premises).

### 3.2 Qualifying events (Section 3)

3. An event is a qualifying event if *all* these criteria apply:

a. the premises where the event is to be held consists of a building and / or other land;

b. the premises at which the event is to be held are not enhanced duty premises;

*NOTE [1]: enhanced duty premises are already subject to the enhanced duty*

c. members of the public will have access to the premises for the purpose of attending the event;

d. it is reasonable to expect that at some point during the event 800 or more individuals may be present on the premises at the same time in connection with their use for the event;

e. measures will be in place to control access to the event. and

*NOTE [2]: This will involve checking that members of the public attending: have paid to do so / have invitations or passes /or are members or guests of a club etc.*

f. the event is not excluded by virtue of a provision in Part 2 of Schedule 2 to the Act

*NOTE [3]: Schedule 2 includes public parks & gardens, secure transport premises and premises mainly used for e.g. worship, childcare or primary, secondary or further education).*

*Note [4]: Where checking public entitlement to attend applies only in relation to parts of the premises, such part of the premises will be treated as a separate event (to be held at that part).*

### **3.3 Who will be responsible? (Section 4)**

4. A person is responsible for a qualifying premises where they have 'control of the premises' in connection with the relevant Schedule 1 use of the premises, or at which a qualifying event is to be held.

*NOTE [1]: for example, the company which holds the lease for and operates a shopping centre. Where, however, e.g., a security guarding company is appointed to provide door staff at a nightclub, but has only limited control over the premises, it is highly unlikely that they will be held to be the person responsible for the premises.*

*Note [2]: If more than one person is responsible for qualifying premises or a qualifying event, both will have responsibility. Further, two or more such persons may act jointly in complying with a requirement imposed on them in relation to the premises, or the event.*

In some instances, Schedule 1 specifies the person responsible for qualifying premises (e.g. for the purposes of a higher education institution the person responsible for the premises is the governing body of the institution).

### **3.4 Public protection procedures (Section 5)**

5. A person responsible for qualifying premises or a qualifying event must - to the extent that it is reasonably practicable:

- put in place appropriate 'public protection procedures' for the premises or the event in order to reduce the risk of physical harm being caused to individuals in the event of an attack at the premises or in the immediate vicinity.

"Public protection procedures" are procedures to be followed by individuals working on the premises or at the event if there is reason to suspect that an act of terrorism is occurring, or is about to occur:

- o on the premises,
- o at the event or
- o in the immediate vicinity of the premises or event.

The 'procedures' comprise arrangements:

(a) for evacuating individuals from the premises or event;

(b) for moving individuals to a place on the premises or at the event where there is less risk of physical harm being caused to them (i.e. a 'place of safety');

(c) for preventing individuals at the premises or event:

- entering or
- leaving.

(d) for providing information to individuals on the premises or at the event.

### **3.5 Public protection measures for enhanced duty premises and qualifying events (Section 6)**

6. The responsible person must, in addition to their standard duty obligations, also, where reasonably practicable, put in place appropriate "public protection measures" to reduce the premises or event's vulnerability to an attack occurring, as well as to reduce the risk of physical harm being caused to individuals, should an act of terrorism occur.

These measures must be assessed and kept under review

“Public protection measures” are measures relating to—

- the monitoring of the premises or event and the immediate vicinity of the premises or event;
- the movement of individuals into, out of and within the premises or event;
- the physical safety and security of the premises or the premises at which the event is to be held;
- the security of information in relation to the premises or event.

### **3.6 Enhanced duty premises and qualifying events: documenting compliance (Section 7)**

7. The responsible person must prepare and update a document relating to the following matters:
  - a statement detailing the procedures that have been implemented, in accordance with section 5, accompanied by an assessment as to how those measures may be expected to reduce (so far as is reasonably practicable) the risk mentioned in that section;
  - a statement detailing the measures in place or proposed to be put in place in accordance with section 6, accompanied with an assessment as to how those measures may be expected to reduce the vulnerability and risk mentioned in that section;
  - and any information which the Secretary of State may, by regulations, require.

A copy of the document must be provided to the Security Industry Authority (SIA) as soon as reasonably practicable after preparation and within 30 days of any revision to the document.

### **3.7 Requirements to co-ordinate and co-operate (Section 8)**

8. If more than one person is responsible for a qualifying event or single premises, those persons must, as far as reasonably practicable, co-ordinate and co-operate in complying with the Act. Where qualifying premises form part of other qualifying premises (i.e shopping centre or entertainment complex), the responsible persons for each must co-ordinate, so far as is reasonably practicable to do so, to comply with the requirements of this Act. Note: individual units, where they meet qualifying premises criteria, must also comply with their own requirements

Where a person is not a responsible person but has some control over enhanced duty premises or a qualifying event, that person must, so far as is reasonably practicable to do so,

co-operate with the responsible person to assist in complying with the requirements of the Act. (i.e. a lessee needing to make modifications to a building, the building owner is required to provide agreement. Likewise for an event in a field where certain protective measures are required, agreement from the landowner will be required).

### **3.8 Notification requirements (Section 9)**

9. A person who becomes a responsible person or ceases to become a responsible person for a qualifying premises or event must notify the SIA.

The responsible person must also notify the SIA of specified matters relating to qualifying premises or events and any inaccuracies or updates.

*NOTE [1]: The Secretary of State may by Regulations specify all matters to be referred to the SIA, the manner in which the information is to be provided and the relevant timescales for providing that information.*

### **3.9 Designating a senior individual (Section 10)**

10. Where a person who is responsible for the enhanced duty premises or events is not an individual, (i.e. a company, partnership or similar) a “relevant individual” must be designated, who will have responsibility for ensuring compliance with the Act.

This person must hold a senior management position and exercise control over the premises in order to be in a position to undertake that role effectively.

### **3.10 “Reasonably practicable”**

The “reasonably practicable” threshold, in the context of enhanced duty premises, recognises that the particular procedures and measures put in place at one location may not be appropriate and reasonably practicable at another. For example, procedures and measures will differ at a cinema that can reasonably expect to have no more than 1,000 people on the premises at any one time from a stadium that can seat 20,000 people. Procedures and measures should be tailored to the specific circumstances of the premises or event.

The Government has provided examples that illustrate the expectations on different types of enhanced duty premises.

*Example:* A 1,200-capacity theatre may take forward the following activities in relation to implementing their public protection procedures and measures:

- Developing and implementing plans for public protection procedures and ensuring that they are routinely rehearsed.
- Ensuring that induction and probation periods for new staff include awareness training packages for all those working at the theatre in roles relating to safety, security and counter-terrorism.
- Developing policies for perimeter and entry checks as well as queue management and ticket checks.
- Using internal radio systems and mobiles for communication between relevant individuals working at the theatre.
- Introducing interim tabletop activities and walk-through scenarios that are designed and led by designated individuals.
- Employing a mixture of salaried and contracted door staff to sufficiently protect ingress and egress areas.
- Developing policies for suspicious or restricted items including bag checks and storage.
- Having effective CCTV with an adequately staffed monitoring and control room.

This list is non-exhaustive and subject to change over time.

In their analogous regulatory role, The Health & Safety Executive has adopted this definition of “reasonably practicable” as set out by the Courts in *Edwards v. National Coal Board* [1949] 1 All ER 743):

*“‘Reasonably practicable’ is a narrower term than ‘physically possible’ ... a computation must be made by the owner in which the quantum of risk is placed on one scale and the sacrifice involved in the measures necessary for averting the risk (whether in money, time or trouble) is placed in the other, and that, if it be shown that there is a gross disproportion between them – the risk being insignificant in relation to the sacrifice – the defendants discharge the onus on them.”*

### **3.11 Determinations by the tribunal (Section 11)**

11. An “interested person” may apply to the Tribunal for a determination of any of the following matters:
  - whether premises are qualifying premises;
  - whether qualifying premises are enhanced duty premises;
  - the relevant Schedule 1 use of qualifying premises. This could be uncertain where premises have more than one Schedule 1 use e.g. a church which is also used as a nursery some days of the week and it is unclear which use is the principal (and therefore relevant) one;

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*Martyn's Law is due to come into force in Spring 2027.*  
***This Guidance has no statutory or legal status***

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- whether an event is a qualifying event;
- the premises at which a qualifying event is to be held;
- whether a person is responsible for a qualifying premises or qualifying event or not;
- the extent of a person's control of an enhanced duty premises or a premises where a qualifying event is to be held.

*NOTE [1]: "Interested person" means the Security Industry Authority, or any person who has (or, in relation to an event, will have at any point during the event) control to any extent of the premises or event to which the application relates.*

*NOTE [2]: "the tribunal" means the First-Tier Tribunal or, where determined by or under Tribunal Procedure Rules, the Upper Tribunal.*

## 4. Investigations, enforcement, and monetary penalties

The Security Industry Authority is responsible for ensuring compliance with the requirements of Martyn's Law and must provide guidance about how they will go about exercising the functions for compliance, investigation and enforcement.

Compliance and enforcement sanctions can include [compliance notices](#), [restriction notices](#) and [penalty notices](#) as set out below. There is a right of appeal against [compliance and restriction notices](#) and against penalty notices.

### 4.1 [Compliance Notices](#)

Where the SIA reasonably believe that a person is contravening or has contravened a relevant requirement, a compliance notice can be issued requiring the person to take specified steps to achieve compliance, or to provide evidence of compliance within a specified time period. The individual must be given an opportunity to make representations about the proposed notice before any notice is given.

The compliance notice must state the reasons for giving the notice and explain what may happen if the notice is not complied with and must also set out how the notice can be appealed.

Compliance notices can be varied or withdrawn, but variations cannot be used to make the compliance notice more onerous. No more than one compliance notice can be given for the same contravention.

### 4.2 [Restriction notices](#)

A restriction notice requires the person given the notice to comply with specified prohibitions or restrictions relating to enhanced duty premises or a qualifying event. As with compliance notices, there is a requirement that the individual be given an opportunity to make representations about the proposed notice before it is given, but *this can be disapplied if the SIA considers that there is an urgent need to give the restriction notice to the person.*

Where there are reasonable grounds to believe that a person is contravening or has contravened a requirement of [section 5](#) or [6](#) in relation to the premises or event, and a restriction notice is necessary to reduce the risk of physical harm to individuals arising from acts of terrorism on the premises, at the event or in the immediate vicinity of the premises or event, a restriction notice can be given.

Restriction notices must state the reason for giving the notice, the period for which the notice has effect (which cannot exceed 6 months unless it is extended by variation under [section 15](#)), and what

may happen if the notice is not complied with. It must also set out that the notice may be varied under [section 15](#), and explain how a person can appeal against the notice.

*Prohibitions and restrictions on enhanced duty premises* include prohibitions on how and when (times) a premises can be used and/or a restriction on the number of persons who may be permitted to be present on the premises at the same time or at specified times.

*Prohibitions and restrictions on qualifying events* include a prohibition on the event taking place, restrictions on the times at which the event may take place, and/or a restriction on the number of persons who may be permitted to be present at the event at the same time or at specified times.

Restriction notices can state that a specific prohibition or restriction does not apply if specific conditions are met. It can also require the person served with the notice to provide evidence to the SIA that the person is complying or has complied with the notice.

Restriction notices can be varied or withdrawn, but variations cannot be used to make the restriction notice more onerous, unless it is to extend the time for which the notice is to apply. Extensions can be for up to 3 months at a time and can only be used where the SIA believe that the reasons for the original notice will continue to apply during the extended period. The person in receipt of the notice must be given an opportunity to make representations in relation to the extension.

#### **4.3 Appeals against compliance and restriction notices**

Appeals against compliance or restriction notices must be made to 'the tribunal' within 28 days of the notice being given or varied.

The tribunal can vary or cancel the notice if it is satisfied that any of the following grounds apply:

- a) based, wholly or partly, on an error of fact;
- b) wrong in law;
- c) unfair or unreasonable for any other reason.

In determining the appeal, the tribunal can review any determination of fact on which the decision to give or vary the notice was made and can take into account evidence which was not available to the SIA when the original decision was made.

Appeals against compliance notices effectively suspend the effect of the compliance notice until the appeal is determined or withdrawn (unless the tribunal orders otherwise).

In the case of restriction notices, where an appeal is made, the restriction order will have effect during the appeal process unless the tribunal orders that the notice or variation is of no effect until the appeal is determined or withdrawn.

#### **4.4 Penalty notices**

The SIA can issue a penalty notice if it is satisfied (on the balance of probabilities) that a person is contravening or has contravened a relevant requirement (a non-compliance penalty). The penalty must then be paid to the SIA within a specified period (at least 28 days).

In addition to the non-compliance penalty, the penalty notice can also specify a [daily penalty](#) payment to the SIA.

Penalty notices can be issued in addition to compliance or restriction notices subject to the maximum determined in accordance with [section 18](#), but only one penalty notice can be issued in respect of the same contravention.

Where a person is convicted of an offence in respect of non-compliance, they are no longer liable for the non-compliance penalty.

Section 18 (non-compliance penalties), states:

##### **18 Maximum amount of a non-compliance penalty**

- (1) The maximum amount of a non-compliance penalty that may be imposed on a person by a penalty notice is—
  - (a) in the case of a contravention of a requirement imposed by a notice under [paragraph 3\(1\)\(b\)](#) of [Schedule 3](#) (requirement to attend and answer questions), £5,000;
  - (b) if, in a case to which [paragraph \(a\)](#) does not apply, the contravention in respect of which the penalty is imposed relates to standard duty premises, £10,000;
  - (c) if, in a case to which [paragraph \(a\)](#) does not apply, the contravention in respect of which the penalty is imposed relates to enhanced duty premises or a qualifying event, the amount is determined in accordance with subsections [\(2\)](#) to [\(4\)](#).
- (2) Where the person does not have an accounting period or the person's first accounting period has not ended, the maximum amount is £18 million.
- (3) In any other case, the maximum amount is whichever is the greater of—
  - (a) £18 million, and
  - (b) 5% of the person's qualifying worldwide revenue for the person's most recent complete accounting period.
- (4) Where the person's most recent complete accounting period is not a period of 12 months, the amount of the person's qualifying worldwide revenue for the period is to be adjusted as follows—
  - (a) if the accounting period is less than a year, the amount is to be proportionately increased;
  - (b) if the accounting period is more than a year, the amount is to be proportionately reduced.
- (5) The Security Industry Authority must—

- (a) produce a statement giving information about the amounts which it does, or does not, regard as comprising a person's qualifying worldwide revenue for the purposes of this section;
  - (b) keep the statement under review;
  - (c) publish the statement (and any revised or replacement statement);
  - (d) send a copy of the statement (and any revised or replacement statement) to the Secretary of State.
- (6) Before producing a statement under [subsection \(5\)](#) (including a revised or replacement statement), the Security Industry Authority must consult the Secretary of State.
- (7) The Secretary of State must lay a copy of any statement received under subsection (5)(d) before Parliament.
- (8) The Secretary of State may by regulations amend—
- (a) subsection (1)(a),
  - (b) subsection (1)(b),
  - (c) subsection (2), or
  - (d) subsection (3)(a),
- so as to substitute a different figure for the figure for the time being specified.
- (9) In this section "accounting period", in relation to a person, means a period in respect of which accounts are prepared in relation to that person.

#### **4.5 [Daily Penalties](#)**

[Section 19](#) states that in addition to the non-compliance penalty, a penalty notice may also require a daily penalty payment to the SIA. The daily payments begin at the end of the period specified in the notice for the payment of the non-compliance penalty and must be set at an amount (with maximum limits) which the SIA consider to be appropriate and proportionate to the contravention it relates to.

In setting the daily penalty amounts, the SIA must take into account the following matters alongside the maximum limits and any other matters the SIA considers relevant:

- (a) the effects of the contravention in respect of which the penalty is imposed;
- (b) any action taken by the person to remedy the contravention or mitigate its effects;
- (c) the ability of the person to pay the penalty.

The maximum limits for daily penalties are £500 for standard duty premises, or £50,000 for enhanced duty premises or qualifying events. These maximum limits can be amended by regulations by the Secretary of State.

#### **4.6 Penalty Notices – requirements**

Individuals must be given an opportunity to make representations about a penalty notice beforehand, and penalty notices must specify:

- (a) the reasons for giving the notice;
- (b) the amount of the non-compliance penalty;
- (c) the amount of any daily penalty;
- (d) how payments may be made;
- (e) the period within which payments must be made;
- (f) the rights of appeal under [section 22](#);
- (g) the consequences of failing to pay the penalty.

Penalty notices can be varied or withdrawn by the SIA, but cannot be varied to increase the amount of a daily penalty, or to add an additional daily penalty or shorten the period for which the penalty must be paid.

#### **4.7 Appeals against penalties**

Appeals can be made to the tribunal against the penalty notice (or a variation of the notice), within 28 days of the notice or variation being given, and the tribunal can vary or cancel the notice if it is satisfied that the notice is based on an error of fact, wrong in law or unfair / unreasonable for any other reason. The tribunal can review any determination of fact and can take into account evidence which was not available to the SIA. Penalty notices or variations have no effect until the appeal is determined or withdrawn unless the tribunal orders otherwise.

#### **4.8 Recovery of penalties**

In England, Wales and Northern Ireland, a penalty is recoverable as if it were payable under an order of the High Court, while in Scotland a penalty may be enforced in the same manner as an extract registered decree arbitral bearing a warrant for execution issued by the sheriff court of any sheriffdom in Scotland.

## 5. Offences

There are 3 offences under the Act:

### 5.1 Offences of failing to comply with compliance notice or restriction notice (Section 24)

A person who is given a compliance notice in respect of a contravention which relates to enhanced duty premises or a qualifying event commits an offence if the person fails to comply with the notice.

A person who is given a restriction notice commits an offence if the person fails to comply with the notice.

It is a defence to show that the accused has taken all reasonable steps to comply with the notice where sufficient evidence supports this and the contrary cannot be proved beyond all reasonable doubt.

There are restrictions on reliance on any 3rd party in a defence.

A person who commits an offence under this section is liable—

- (a) on summary conviction in England and Wales, to imprisonment for a term not exceeding the general limit in a magistrates' court or a fine (or both);
- (b) on summary conviction in Scotland, to imprisonment for a term not exceeding 12 months or a fine not exceeding the statutory maximum (or both);
- (c) on summary conviction in Northern Ireland, to imprisonment for a term not exceeding six months or a fine not exceeding the statutory maximum (or both);
- (d) on conviction on indictment, to imprisonment for a term not exceeding two years or a fine (or both).

### 5.2 Offence of providing false or misleading information (Section 25)

A person commits an offence under this section if they knowingly provide false or misleading information or are reckless as to whether the information is reckless or misleading.

A person who commits an offence under section 24 ([24\(11\)](#)) or section [25 \(25\(2\)\)](#) is liable—

- (a) on summary conviction in England and Wales, to imprisonment for a term not exceeding the general limit in a magistrates' court or a fine (or both);
- (b) on summary conviction in Scotland, to imprisonment for a term not exceeding 12 months or a fine not exceeding the statutory maximum (or both);

- (c) on summary conviction in Northern Ireland, to imprisonment for a term not exceeding six months or a fine not exceeding the statutory maximum (or both);
- (d) on conviction on indictment, to imprisonment for a term not exceeding two years or a fine (or both).

### **5.3 Liability for offence committed by a body (Section 26)**

Where a body (not a person) commits the offences of failing to comply with a compliance, restriction or information notice, a relevant person may also be liable where the offence is committed with their consent or connivance or is attributable to neglect on their part.

The same applies to offences by a body in connection with

- (a) section 25 (providing false or misleading information to the Security Industry Authority),
- (b) paragraph 11 of Schedule 3 (obstructing an authorised inspector), or
- (c) paragraph 12 of Schedule 3 (pretending to be an authorised inspector).

“Relevant person” means—

- (a) in relation to a body corporate other than one whose affairs are managed by its members, an officer of the body or any other person who is concerned in the management or control of the body;
- (b) in relation to a body corporate whose affairs are managed by its members, a member or any other person who is concerned in the management or control of the body;
- (c) in relation to a limited partnership, a general partner or any other person who is concerned in the management or control of the limited partnership;
- (d) in relation to any other partnership, a partner or any other person who is concerned in the management or control of the partnership;
- (e) in relation to any other unincorporated association, a person who is concerned in the management or control of the association.

### **5.4 Disclosure of information**

[Section 28](#), provides that any person can disclose information to the SIA in connection with offences under the Act. Critically, section 28 also allows the SIA to share information with:

- (a) any person for the purposes of the exercise by the Security Industry Authority of any of its functions under this Part;
- (b) any person with functions of a public nature for the purposes of the exercise by that person of any of those functions.

Disclosure of information must not contravene data protection laws, and cannot include information prohibited by any of Parts 1 to 7 or [Chapter 1](#) of [Part 9](#) of the [Investigatory Powers Act 2016](#).

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***This Guidance has no statutory or legal status***

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This will be an essential provision in relation to the future professional relationship between the SIA, police and licensing authorities and will be critical in relation to breaches under Martyn's Law in connection with licensed premises.

Given that offences under Martyn's Law are criminal in nature, there is scope for the SIA to make representations to licensing authorities in connection with licence applications, and to request review under the crime and disorder or public safety objectives.

## 6. Plans of premises: Regulations

Section 34 makes provision for the Secretary of State to provide regulations about the inclusion of plans in public registers and the disclosure of plans. This will provide a 'Sensitive Information in Licensing Applications' (SILA) process, similar to '[Sensitive Information in Planning Applications](#)' (SIPA), and provides for restricting public access to full plans of premises, where access might otherwise be useful to anyone with hostile intentions.

It is not currently clear exactly what the requirements for SILA will be, and the Section 182 Guidance will require updating to reflect the requirements once they are made publicly available. It is likely that this will happen much earlier than the implementation of Martyn's Law.

Licensing Authorities will likely need to review their arrangements for how plans are, and can be, displayed on their public registers particularly where they are published online. Similarly, they will need to consider how the versions of plans are recorded and distinguishable on their licensing systems

Although details will follow in regulations, The SILA process will require all new licence applicants applying for a premises licence, club premises certificate or provisional statement in England, Wales and Scotland to supply two plans to the Licensing Authority in support of the application.

The first plan will be a detailed plan for the Licensing Authority's use, whilst the second plan - which is the new component of this provision - will be a less detailed plan that will be made available for public inspection.

In addition, the Bill requires, on the application of the holder of a premises licence or club premises certificate, plans held by a Licensing Authority which contain sensitive information to be removed from the public register and replaced with a modified version of the plan

### 6.1 [Licensing: disclosure of plans of premises \(Section 34\)](#)

(1) [Schedule 4](#) amends—

- (a) the Licensing Act 2003, and
- (b) the Licensing (Scotland) Act 2005 (asp 16),

to make provision about the inclusion of plans in public registers kept under those Acts and about the disclosure of certain plans not included in those registers.

(2) The Secretary of State must by regulations make provision as to the form and content of plans for the purposes of any provision of the [Licensing Act 2003](#) or the [Licensing \(Scotland\) Act 2005](#) that refers to regulations under [this subsection](#).

(3) The regulations may only include provision for the purpose of restricting the disclosure of information that the Secretary of State considers is likely to be useful to a person committing or preparing an act of terrorism.

- (4) The Secretary of State may by regulations specify the amount of the fee that is to accompany an application under the following provisions (which are inserted by [Schedule 4](#))—
- (a) [paragraph 4 of Schedule 3](#) to the [Licensing Act 2003](#) (application to replace old plan of premises included in a licensing register);
  - (b) [paragraph 5 of Schedule 3](#) to [that Act](#) (application to replace old plan of works included in a licensing register);
  - (c) [paragraph 2 of Schedule 1A](#) to the [Licensing \(Scotland\) Act 2005](#) (application to replace old plan of premises included in a licensing register).

- (5) In [subsection \(3\)](#)—

“committing or preparing an act of terrorism” includes the use or threat of action which it is reasonable to suspect may be being carried out in the course of, or in the planning or preparation of, an act of terrorism;

“terrorism” has the same meaning as in the [Terrorism Act 2000](#) (see section 1 of that Act).

## 7. Acknowledgements

The intention of our Guidance, which has no statutory or legal status, is that it should operate as a basic initial guide to what is known – and yet to be announced – in relation to this important new regime.

The Guidance has been drafted through the IoL's Special Interest Group for Martyn's Law, chaired by Jeremy Phillips KC.

The Guidance will be an evolving document, developing as we receive feedback from all quarters, whether it be operators, councils, police or members of the public. In that regard we feel that the IoL has a unique contribution to make, given the very extensive combined expertise of its membership.

We are grateful to Sir John Saunders for his consideration and for providing the foreword to this Guidance.

With sincere thanks also to the IoL's Special Interest Committee for Martyn's Law:

- Jeremy Phillips KC, Francis Taylor Building (Chair)
- Gary Grant, Francis Taylor Building (IoL Vice Chair)
- David Lucas (IoL Vice Chair)
- Andy Grimsey, Poppleston Allen Solicitors
- Fraser Swift, Manchester City Council
- Gordon Hunter (previously Edinburgh City Council), IoL Scotland Chair
- James Cunningham, IoL Northern Ireland Chair
- Jon Collins, LIVE
- Paul Fair, Clackmannanshire Council
- Philip Kolvin KC, 11 KBW
- John Miley, IoL Advisory Council Representative (East Midlands Region)
- Sue Nelson, IoL Director of Policy and Stakeholder Engagement
- Ellie Birch, IoL Executive Assistant



# APPENDICES

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**APPENDIX A**

**TOP TIPS**

**INFOGRAPHIC**

**PUBLISHED BY THE**

**HOME OFFICE**

**(FEB 2026)**

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[Link to source](#)



# Terrorism (Protection of Premises) Act 2025: Prepare to Protect

## Top Tips on getting ready for Martyn's Law.

The Terrorism (Protection of Premises) Act 2025, also known as Martyn's Law, received Royal Assent on **3 April 2025**. There will be an **implementation period of at least 24 months from April 2025**, before the Act comes into force. The government will publish guidance during the implementation period to support those in scope of the Act to prepare to comply with the new legal requirements.

These top tips **are intended to help**

- those responsible for premises and events to find out whether they will be in scope,
- those that will be in scope to prepare to comply with the new requirements,
- wider good practice of protective security and preparedness.

If you are in scope of the Act, you do not have to do anything yet, but planning will help you prepare to comply with Martyn's Law.



## What should you know about the Act.

- Watch a brief overview of the Act's scope and requirements on **ProtectUK**.
- Read our **One Page Leaflet, Terrorism (Protection of Premises) Act**.
- Find out more about scope and requirements in the **Terrorism (Protection of Premises) Act's factsheets**.
- Read about common misunderstandings in the **Terrorism (Protection of Premises) Act 2025: Martyn's Law myth buster**.
- Look out for the publication of Home Office guidance (and associated material) on the requirements of the Act and of the **Security Industry Authority (SIA)** guidance on its function as the Act's regulator. Considering the requirements and your protective security and preparedness early will help you prepare for the Act.
- For the latest updates about the Act follow ProtectUK on **LinkedIn**, the Home Office on **LinkedIn** and the SIA on **LinkedIn**.



## Where to find FREE wider resources on counter terrorism and protective security ahead of the Act coming into force.

- Ahead of the Home Office publishing the guidance and the Act coming into force, you can still develop a good security culture.
- The National Counter Terrorism Security Office's (NaCTSO) **ProtectUK** website provides counter terrorism protective security and preparedness guidance and learning – this is available and relevant to all organisations. This resource supports organisations in both the public and private sectors to understand a range of threats and potential mitigations, including options for approaching **risk management**.

- The National Protective Security Authority (NPSA) is the **National Technical Authority** for physical and personnel security. NPSA's website provides useful information about protective security procedures such as lockdown, invacuation and evacuation. Premises in scope of the Act will need to have in place these procedures and should also refer to the Home Office guidance on the Act when it is published. This will likely help you to formulate your plans as it provides a good technical guide to lockdown, invacuation and evacuation.



### **What do you currently have in place for security in the event of an incident or emergency?**

- Review how your existing security or emergency plans and arrangements align with the Act. The factsheets about the Act's scope (**premises** and **events**) will assist you in your relevant preparation. In addition, both the **standard tier** and **enhanced tier requirements** include having procedures in place to respond in the event of an emergency.
- You can also find guidance on first aid during a terrorist attack on **ProtectUK**. Please note that first aid is not a requirement of the legislation.



### **Have you thought about how you can upskill and prepare your staff?**

- It's good security practice for your staff to be aware of the general terrorist risk, what steps can be taken to mitigate the risk and how you can better protect the public.
- Staff counter terrorism and protective security awareness can be developed through FREE e-learning such as **ACT Awareness e-Learning | ProtectUK**, and **See Check and Notify (SCaN) NPSA**.
- Although completing the training will not make you compliant with Martyn's Law and does not form part of the Martyn's Law compliance, it does provide staff (including employees, contractors and volunteers) with basic but valuable awareness of counter terrorism and protective security.



### **Have you visited ProtectUK and NPSA for helpful guidance on counter terrorism and protective security?**

- Scan the QR below to access FREE ProtectUK guidance, and training on protective security and on improving your organisation's terrorism response.



Scan this QR code to read more about  
Martyn's Law on ProtectUK

**APPENDIX B**

**HOME OFFICE**

**INFOGRAPHIC**

**RE QUALIFYING**

**PREMISES**

**(FEB 2026)**

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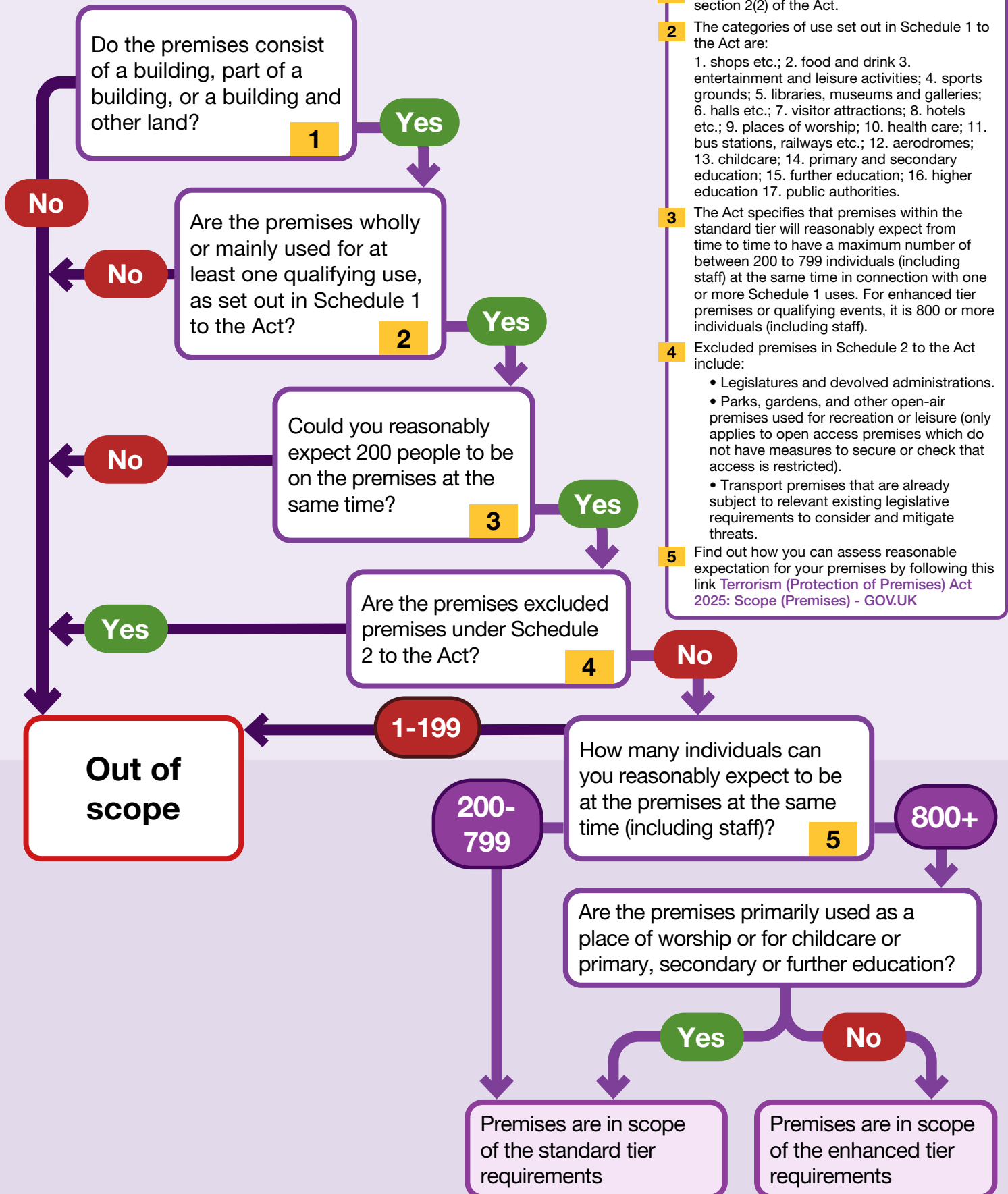
[Link to source](#)



# Terrorism (Protection of Premises) Act 2025: Qualifying Premises: How to determine whether your premises is in scope of the Act.

## KEY

- 1** The definition of premises can be found in section 2(2) of the Act.
- 2** The categories of use set out in Schedule 1 to the Act are:  
1. shops etc.; 2. food and drink 3. entertainment and leisure activities; 4. sports grounds; 5. libraries, museums and galleries; 6. halls etc.; 7. visitor attractions; 8. hotels etc.; 9. places of worship; 10. health care; 11. bus stations, railways etc.; 12. aerodromes; 13. childcare; 14. primary and secondary education; 15. further education; 16. higher education 17. public authorities.
- 3** The Act specifies that premises within the standard tier will reasonably expect from time to time to have a maximum number of between 200 to 799 individuals (including staff) at the same time in connection with one or more Schedule 1 uses. For enhanced tier premises or qualifying events, it is 800 or more individuals (including staff).
- 4** Excluded premises in Schedule 2 to the Act include:
  - Legislatures and devolved administrations.
  - Parks, gardens, and other open-air premises used for recreation or leisure (only applies to open access premises which do not have measures to secure or check that access is restricted).
  - Transport premises that are already subject to relevant existing legislative requirements to consider and mitigate threats.
- 5** Find out how you can assess reasonable expectation for your premises by following this link [Terrorism \(Protection of Premises\) Act 2025: Scope \(Premises\) - GOV.UK](#)



# **APPENDIX C**

## **HOME OFFICE INFOGRAPHIC RE QUALIFYING EVENTS (FEB 2026)**

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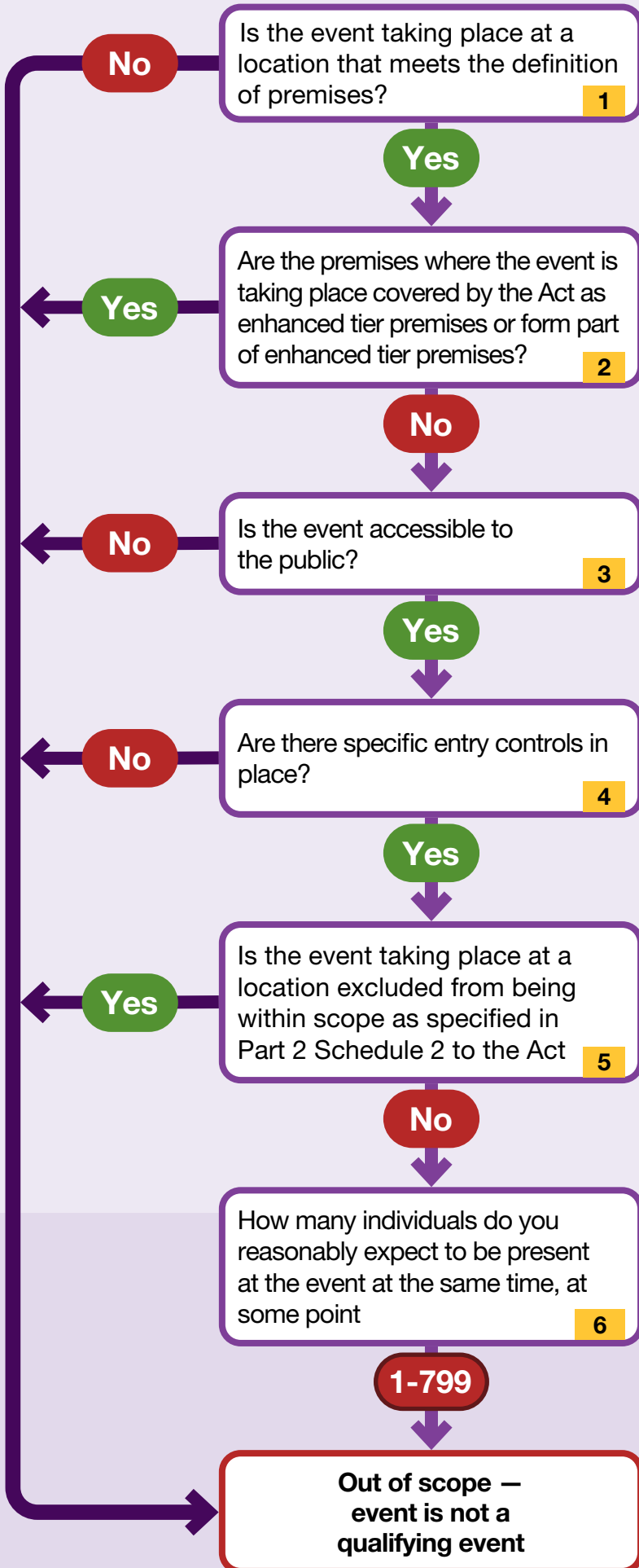
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# Terrorism (Protection of Premises) Act 2025: Qualifying Events: How to determine whether your event is in scope of the Act.

## KEY

- 1** The definition of events can be found in section 3.1.a of the Act
- 2** The event must be taking place at a location that is not already in scope of the Act as enhanced tier premises. If the premises meets the criteria to be enhanced tier premises, please see the infographic on qualifying premises
- 3** Members of the public must be able to access all or part of the premises for the purposes of attending the event. Events will not be qualifying events under the Act where the condition for entry is personal to the attendees and, as a result, access is not open to the public.
- 4** The event must have measures in place to check that attendees satisfy a condition of entry. This is the requirement that, to enter the event, members of the public have paid, have a ticket or pass, or are members or guests of a club, association or similar body
- 5** Certain events are excluded from being qualifying events under Part 2 of Schedule 2 to the Act. These are:
  - an event held at premises specified or described in the following paragraphs in Schedule 2 to the Act—
    - paragraphs 1 and 2 (legislatures and devolved administrations),
    - paragraph 4 (transport security)
  - An event that is to be held at premises wholly or mainly used for a use specified in the following paragraphs of Schedule 1: paragraph 9 (places of worship), paragraph 13 (childcare), paragraph 14 (primary and secondary education), or paragraph 15 (further education).
- 6** To be in scope, it should be reasonable to expect that 800 or more individuals will be present at the event at the same time, at some point during the event. This figure must include staff working at the event. Only those attending or working in the part of the premises connected with the event should be captured.  
Find out how you can assess reasonable expectation for your event by following this link [Terrorism \(Protection of Premises\) Act 2025: Scope \(Premises\) - GOV.UK](#)



Is the event taking place at a location that meets the definition of premises? **1**

No

Yes

Are the premises where the event is taking place covered by the Act as enhanced tier premises or form part of enhanced tier premises? **2**

Yes

No

Is the event accessible to the public? **3**

No

Yes

Are there specific entry controls in place? **4**

No

Yes

Is the event taking place at a location excluded from being within scope as specified in Part 2 Schedule 2 to the Act **5**

Yes

No

How many individuals do you reasonably expect to be present at the event at the same time, at some point **6**

800+

1-799

**Out of scope – event is not a qualifying event**

**Event is a qualifying event subject to enhanced tier requirements**



Institute of  
Licensing

[www.instituteoflicensing.org](http://www.instituteoflicensing.org)

01749 987 333

[info@instituteoflicensing.org](mailto:info@instituteoflicensing.org)

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