



Keeping people and communities safer with Martyn's Law

At Mitie, we believe in creating better places and thriving communities. Our safety-focused approach and culture align with Martyn's Law, which promotes preparedness, proportionate security and protecting people.

This updated briefing reflects the **latest Home Office and SIA guidance as of May 2026**.

## What is Martyn's Law?

Martyn's Law, officially known as the **Terrorism (Protection of Premises) Act 2025**, is named in honour of Martyn Hett, who tragically lost his life in the 2017 Manchester Arena attack. The law is the result of campaigning by Martyn's mother, Figen Murray OBE, to ensure lessons are learned and that public spaces are better prepared to keep people safe.

The legislation introduces new obligations for certain public premises and events to consider how they would respond if a terrorist attack were to occur, and, for larger venues, to take reasonable steps to reduce vulnerability.

The Act received Royal Assent in April 2025, but will not be enforced until at least Spring 2027. A grace period will likely follow, allowing organisations more time to prepare. The duration of this period has not yet been confirmed.

Ultimately Martyn's Law is about **preparation and sensible risk management**, not predicting likelihood of an incident or living in a heightened state of fear.

## What's changed since late 2025?

Since our last update, further official guidance has been published, including:

- Home Office Section 27 (S27) guidance (Formally released and not subject to change)
- [SIA Section 12 \(S12\) guidance](#) (Released for public consultation)

In addition, the Counter Terrorism Alliance continues to publish supporting material via the [ProtectUK website](#), including:

- Infographics and animations
- Early guidance documents
- A developing implementation roadmap to support step-by-step consideration of threats and risks

These materials are intended to help organisations understand how to approach preparedness, not to prescribe a one-size-fits-all solution.

## What hasn't changed?

It's just as important to be clear on what **has not changed**:

- There is still **no requirement for organisations to purchase security products or services** (However, some of our customers are exploring Mitie products to manage complex estates, including Risk Management software, conducting Threat, Vulnerability and Risk Assessments, and considering Level 3 training for key personnel).
- The law remains firmly grounded in proportionality and reasonable practicability.
- Guidance is still evolving, and uncertainty remains in some sectors regarding the scope of the Act.
- The focus is on **procedures, awareness and response**.

The Government has been clear that Martyn's Law continues to be framed around the question:

*“What would you do if a terrorist incident were to happen?”*

Not:

*“How likely is an attack?”*

## Which premises are in scope?

Martyr's Law introduces a tiered approach, based on the number of people who may be present at a premises or event at any one time, including staff:

### Standard Tier

- Applies to premises or events with **200–799 people**
- Expected to focus on **basic, practical security measures**, such as:
  - Clear procedures
  - Basic training and awareness
  - Simple, existing controls (e.g. locks, alarms, communication plans)

### Enhanced Tier / Qualifying Events

- Applies to premises or events with **800+ people**
- Will have additional requirements, reflecting increased complexity and risk

There remains some uncertainty around specific types of premises. Authorities are aware and have offered 'drop-in' sessions to provide greater clarity. [Register your interest with the SIA here.](#)

## Core “Must” requirements

The Act establishes a set of mandatory (“must”) requirements for all qualifying premises and events, with additional obligations for enhanced tier locations. These requirements are framed around “reasonably practicable” implementation, aligning with existing UK safety legislation.

### Core requirements (All in-scope premises and events)

All Responsible Persons **must**:

- **Notify the Security Industry Authority (SIA)**
  - The Responsible Person must notify the regulator when they become (and cease to be) responsible for a premises or event.
- **Implement public protection procedures**
  - Appropriate procedures **must be in place**, so far as is reasonably practicable, to reduce the risk of physical harm in the event of an attack.
- **Ensure procedures cover:**
  - **Evacuation** – safely moving people out of the premises.
  - **Invacuation** – moving people to a place of relative safety within the premises.
  - **Lockdown** – securing the premises to restrict attacker movement.
  - **Communication** – alerting and instructing people during an incident.
- **Ensure procedures are workable and applied in practice**
  - Procedures must be **capable of being implemented effectively** by staff, not simply documented.
- **Cooperate and coordinate with other duty holders (where applicable)**
  - Particularly relevant in multi-occupancy or shared environments.

## Additional requirements (enhanced tier premises and events)

For premises or events with a capacity of **800+** (enhanced tier), additional “musts” apply:

- **Implement public protection measures (not just procedures)**

- Measures must, so far as reasonably practicable, reduce both:
  - o vulnerability to a terrorist attack
  - o the risk of physical harm if an attack occurs

- **Document and evidence compliance**

- Organisations must **record procedures and measures in place** and be able to provide this information to the regulator. **NOTE:** The SIA is expected to provide templates for these, with a digital service for upload. These are still in development and trial periods.

- **Designate a Senior Individual (where the Responsible Person is an organisation)**

- A senior leader must be formally appointed to oversee compliance. More info on this below.

## Overarching principle is ‘reasonably practicable’

Across all requirements, compliance is framed around the principle of **reasonable practicability**, meaning:

- Measures must be **proportionate to the nature, scale and risk profile** of the premises.
- Organisations are expected to **balance risk reduction against cost, effort and operational feasibility**.
- The Act does **not mandate specific security solutions**, but requires demonstrable, risk-informed decision-making.

### Responsible Person and Senior Individual requirements

A key structural component of the Act is the introduction of clearly defined accountability through the roles of the **Responsible Person** and, for enhanced tier premises, the **Senior Individual**.

#### Responsible Person

The Act requires that **every qualifying premises and event has a defined Responsible Person**, who holds legal accountability for compliance.

The Responsible Person is **the individual, organisation or company that has control of the premises or event**, specifically in relation to its public-facing use. This is determined by **operational control (day-to-day management and decision-making)** rather than ownership of the building.

Legal responsibility **cannot be delegated to third parties (e.g. contracted security providers)**, although delivery of activities can be delegated.

### Senior Individual (enhanced tier only)

For **enhanced tier premises and qualifying events (800+ capacity)**, an additional governance requirement applies where the Responsible Person is an organisation:

The organisation **must designate a Senior Individual. This must be a senior member of the organisation (e.g. director, partner or equivalent)** with oversight of organisational affairs. The Senior Individual is **responsible for ensuring the organisation complies**, rather than executing operational tasks directly.

## What sensible preparation looks like now

While enforcement is still some time away, organisations can take **practical steps** that align with good security and resilience practice:

- Consider terrorism-related threats as part of existing risk assessments
- Promote ACT Awareness training (free and widely recommended)
- Ensure procedures are documented, understood and practised
- Brief teams so they know what to do in an emergency
- Stay informed as guidance continues to develop

None of these require major investment. They focus on **people, process and preparedness**.

## How Mitie can support

Be wary of organisations promoting costly Martyn's Law-related solutions prematurely. At Mitie, we wish to make it clear that...

- **There is no requirement to buy services to demonstrate readiness at this stage**
- **Our advice is free, impartial and grounded in official guidance**
- We focus on **cutting through confusion**, not selling fear

This is an opportunity for open, honest conversations that add genuine value.

We understand that every organisation starts from a different place. Depending on your risk profile, existing arrangements and timing, Mitie can support - if and when it is useful - across areas such as:

- Threat, Vulnerability and Risk Assessments (TVRA)
- Reviewing perimeter security and access arrangements
- Reviewing or developing plans, policies and documentation
- Role appropriate training pathways (including [Level 3 Award in Counter-Terrorism Protective Security and Preparedness](#))
- Site and team briefings aligned to refreshed ACT Awareness
- Support aligned with wider risk, resilience and business continuity activity

**These are options, not obligations.**

## Our commitment

Mitie has an active Martyn's Law Steering Committee, working closely with Government and industry bodies.

We're committed to:

- Sharing accurate updates as guidance evolves
- Being open about what is known and what isn't
- Supporting calm, proportionate preparedness

## Questions?

If you have questions or would like to talk through what this means for your organisation, we're here to help. Email Mitie Director of Security Strategy, Rachel Webb:

[Rachel.Webb@mitie.com](mailto:Rachel.Webb@mitie.com)

**Let's work together to create safer communities and high-performing places.**

