

PRACTICAL GUIDE

Martyn's Law (The Terrorism (Protection of Premises) Act 2025) and Independent Churches

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1.0 Introduction

The Terrorism (Protection of Premises) Act 2025, commonly referred to as Martyn’s Law, achieved royal assent in April 2025, with a 24-month period to bring the Act into force. During this two-year period guidance is expected from the government on how this is to be implemented. As yet, the full guidance has not been publicised.

The Act is intended to improve security to protect the public and to help organisations prepare for possible terrorist attacks at certain premises and events. There is also a requirement for larger premises and events to take appropriate practical steps to reduce vulnerability to terrorist attacks. The aim of the legislation is to balance helping organisations think through what they can practically do with not wanting to over burden organisations, particularly in relation to costs.

2.0 Premises and events

There are effectively three tiers of premises in relation to the Act. These relate to the number of people that would be expected to be present in or on the premises at any one time. A Home Office flow diagram in Appendix 1 will help you work out which tier applies to you. Details of how to calculate number is shown below. If the numbers are less than 200, they fall outside the scope of the Act. If numbers are 200, but below 800 and there is at least one building involved and the uses of the premises are specified in Schedule One to the Act¹, they will be considered “standard duty” premises. If the premises are expected to have 800 or more individuals at any one time, they are normally considered to be “enhanced duty” premises. Schedule One uses include properties used as places of worship. They also include properties used for childcare, food and drink and leisure activities, all of which often are included within the uses of church premises. However, places of worship (if this is the primary use) are excluded from enhanced duty premises, even if attendance numbers are over 800 individuals.

There are also events that may take place on land without buildings, or on/in premises that are not enhanced duty premises (i.e. their use does not fall under Schedule One), where the event is accessible to members of the public and at least 800 individuals are likely to be present at the event at any time and where there are measures to check who is attending the event (e.g. tickets or passes are required). These will also fall within the scope of the Act. For a church this might include a fund day on a local park.

3.0 Assessing numbers

A “qualifying premises” for the standard duty under the Act is one where it is reasonable to expect that from time to time 200 or more individuals may be present on the premises at the same time in connection with one or more of the uses specified in Schedule One. This does not necessarily mean that if you can fit more than 200 people in your premises that you would fall within the scope of the Act. There are a number of ways of making a reasonable assessment on the likely numbers for your premises, including the following:

3.1 Historic attendance

If you have evidence of numbers attending worship times and other meetings in the building, an assessment can be made based on these. You will also need to take into account special

¹ Schedule One uses are shops, food and drink, entertainment and leisure activities, sports grounds, libraries, museums and galleries, halls, visitor attractions, hotels, places of worship, healthcare, bus stations, railways, aerodromes, childcare, primary and secondary education, further education, higher education and public authorities.

events, such as Christmas activities, funerals and weddings. It will not be based on averages, but on the maximum number that have attended activities/events in the recent past (e.g. the last two years) and also whether you would expect to have similar numbers to events (e.g. funerals) in the future. For example, if you have a weekly attendance to worship times of 50 people, but have had funerals or weddings where 250 people have attended, you will need to base the figure on the higher amount of 250 people.

3.2 Safe occupancy for fire safety purposes

Places of worship are assessed for their safe occupation for fire safety under the Building Regulations. This takes into account the maximum number of individuals that could fit into the floorspace and also the maximum capacity for exiting the building (i.e. the width of the exits) with the lowest of the two figures determining safe occupancy. Details of how to carry out these calculations are shown in Church Growth Trust's practical guide on "Fire exits and escape routes in church buildings".

3.3 Fixed seating and/or standing positions

The number of seats or spaces for people to stand could be used to assess the maximum number likely to attend an event or the premises. This only works where the seating is fixed (e.g. pews), as otherwise the number of seats will be determined by how many are put out for an event (plus standing space).

3.4 Other methods

It may be possible to limit the number of people attending your premises by issuing tickets for larger events or requiring pre-registration. There may be other methods of restricting the numbers, by for instance counting people at the door and stopping entry when you have reached your maximum numbers.

All the above generally apply to buildings, where access can be more easily determined. Where there are other events organised by the church, for instance in the grounds of the church or in a nearby park, numbers may be much higher and therefore may exceed the 800 threshold, without the normal exception for a place of worship, that will require the church to consider public protection procedures that would normally be applied to enhance duty premises. See below for more details. These one-off events would also need to be notified to the Security Industry Authority (SIA).

4.0 Responsible person

For premises that fall within the scope of the Act, the responsible person is the person who has control of the premises in connection with their relevant Schedule One use. This would be in the case of a church the leadership or trustees of the church. Where there are multiple uses (e.g. church use and a pre-school or creche use), the person or persons responsible for the principal or dominant use would be the responsible person. If the church premises are being hired out for a party or other activity, it would normally be the church's responsibility in respect of the Act (assuming that the activity is likely to be for more than 200 people).

For a qualifying event the responsible person(s) would be normally the person who has control of the premises at which the event will be held. If the church allows someone else to organise an event in the church grounds where the other organisation has full control over the event, it would be the other organisation's responsibility. If however the church is organising the event themselves or if the church is organising an activity in a local park where the church has control over the event and access to it, in both of these situations the church would be the responsible person.

5.0 What are the requirements of the Terrorism (Protection of Premises) Act 2025?

5.1 Standard duty premises requirements

For standard duty premises (i.e. premises that would have between 200 and 799 individuals attending at any one time) there is a requirement to notify the Security Industry Authority (SIA) of the premises. There is also a requirement to have in place reasonably practicable and appropriate public protection procedures. In determining what is “reasonably practicable” the responsible person(s) will need to take into account their particular circumstances, including the nature of the premises and the resources available to them. These will vary for each church depending on the building and the resources (people, funds etc.) available.

Public protection procedures are procedures that are to be followed by people working at the premises (or volunteers who are responsible for the activities at the premises) in the event of an act of terrorism occurring at the premises or in the immediate vicinity. The expectation is that the procedures will reduce the risk of physical harm being caused to individuals at the premises. The requirement for standard duty tier premises are meant to be simple, easy to implement and not costly activities. There is no requirement to put in place physical measures. The Act requires four types of procedures which are reasonably practicable and appropriate as follows:

5.1.1 Evacuation

Evacuation is the process of getting people safely out of your premises. You therefore need to consider exit routes, how people will be guided out of the premises and alternative routes if these are not available.

5.1.2 Invacuation

Invacuation is the process of moving people to a safe place. It is therefore bringing people safely into or to safer parts of the premises. You therefore need to consider which parts of your premises may be easy to direct people to, would be safer to protect them against any terrorist attack and whether there are alternatives to these.

5.1.3 Lockdown

Lockdown is the process of securing the premises to prevent individuals entering or leaving the premises. It would be for instance restricting or preventing entry by an attacker by locking doors, closing shutters or using available barriers. It may be possible to consider locking down parts of the building if an attacker is already in the premises.

5.1.4 Communication

Communication is the process of alerting people on the premises to the danger. It would for instance be providing instructions for people to remain in place or move away from any danger. How practical this is will depend on the size and complexity of the building.

The Act does not require physical alterations or the purchase of equipment for the purpose of having these procedures in place. This does not stop you from considering possible physical alterations or the purchase of equipment if you feel that it is appropriate. It is important that whoever is in charge of activities within the building is made aware of the procedures so that they are able to put them into practice should a terrorist attack occur. The public protection procedures are intended to be straightforward and understandable by non-professionals and the Act does not anticipate the necessity for specialist advisers to be required.

5.2 Enhanced duty premises requirements

Requirements are greater for enhanced duty premises and qualifying events where it is reasonable to expect that 800 or more individuals (including staff or volunteer members) may be present on the premises at the same time. However, there is an exception for premises that are primarily used as places of worship, which would only be treated as standard duty premises, even if over 800 people were likely to attend activities. This does not stop churches that are likely to have these numbers from considering some or all of the requirements for enhanced duty premises if it is practicable and affordable. The requirements for enhanced duty premises and qualifying events are therefore set out below for information.

The requirements for enhanced duty premises (and qualifying events) include reasonably practicable and appropriate public protection measures that are likely to reduce the vulnerability of the premises or event to an act of terrorism and to reduce the risk of physical harm being caused to individuals if an attack was to occur at the premises/event or nearby. There is also a requirement **to document the public protection procedure and measures** in place or that are proposed to be put in place and provide this to the SIA. In the case of a church² where there is more than one individual who is “the responsible person” a senior individual will need to be designated with the responsibility of ensuring that the procedures and measures are put in place.

The four types of procedures that are set out above under the standard duty premises will also apply to the enhanced duty premises, but must be documented for the SIA to see. There are also four types of **public protection measures** that need to be considered as follows:

5.2.1 Measures in relation to monitoring the premises or event and their immediate vicinity

Monitoring measures focus on identifying and reporting signs of suspicious behaviour, as well as items and other potential indicators of terrorist attacks. This could include circulating awareness-raising material to those working at or volunteering at the premises (or event). It could also include CCTV or other monitoring systems. Any suspicious behaviour should be recorded and ideally reported to the police.

5.2.2 Measures in relation to controlling the movement of individuals into, out of and within the premises or event

Movement measures focus on trying to reduce the risk of harm and protecting members of the public whilst they enter, are within and leave the premises or event. These could include agreeing processes for observing suspicious behaviour and items on entry to the premises, searching or screening individuals and putting in place barriers.

5.2.3 Measures in relation to the physical safety and security of the premises (or event)

Physical safety and security measures focus on strengthening your premises and any events to try to reduce the impact of certain types of attacks and/or deter or hinder any attackers. This could include “stand-off zones” (a designated area to place distance between one location or another), safety glass in external doors and windows and possibly barriers to prevent vehicles from getting near or into buildings.

5.2.4 Measures in relation to the security of information

Consideration needs to be given to understanding the sensitivities of information which may assist in the planning, preparation or execution of acts of terrorism, particularly considering

² This only applies for a qualifying event, as the use as a place of worship is exempt for enhance premises requirements.

what is appropriate to share, where this is shared and who with. It may include key information about the premises or event, operating environment, design or usage that could reveal vulnerabilities. This may for instance mean that floor plans are not widely available.

6.0 Security Industry Authority

The Security Industry Authority (SIA) is tasked with supporting, advising and guiding those that are responsible for premises that fall within the legislation. However, they are also given the responsibility to enforce the Regulations. Where they perceive that there is serious or persistent non-compliance with the Act they could take enforcement action, including compliance notices, monetary penalties and restriction notices. The government has given 24 months from April 2025 for guidance to be written and for people responsible for premises to put in place their procedures and measures. This guidance will be available in due course on ProtectUK's website³.

Standard duty premises are required to notify the SIA of their premises and enhanced duty premises are required to provide the SIA with a copy of their written procedures and measures. One-off events with over 800 people that may take place on standard duty premises are also to be notified to the SIA.

7.0 Other security measures

There are a number of other practical security measures that churches can take, not all necessarily relating to terrorist attacks. These include the following:

7.1 Lock up

It is worth checking whether doors and windows have robust locks. Normally insurers require a minimum of a five-lever lock for doors and security locks for windows. There should also be in place a procedure for making sure that all external windows and doors are locked after activities have taken place in the building, either by members of the church or hirers. Locking internal doors, providing they do not interfere with fire exit routes or other evacuation routes, should also be considered to prevent access to the whole building.

7.2 Cameras and lighting

Closed-circuit TV (CCTV) in strategic locations enables you to monitor the use of these area and to digitally record. Even the erection of a "fake" camera can be a deterrent. Floodlights either on timers or on sensors around the building can also be a deterrent, particularly to cover vulnerable areas. It is also possible to have lighting systems that operate by passive infrared detectors which detect body heat. This will mean that it is less likely to cause disturbance to the neighbours with the lights being permanently on.

7.3 External areas

Lockable gates or security bollards to car parks and driveways will restrict access when the building is not in use and also where necessary during activities. Preventing access to roofs not only stops theft, but also stops people gaining access to the building. Anti-climb paint on downpipes and making sure that ladders are removed and in a secure place will help with security. Securing outbuildings, external storage areas and basements will also ensure that it is more difficult for thieves to operate and prevent unauthorised access.

³ <https://www.protectuk.police.uk/>

7.4 Alarms

Depending on the size of your building and its location, intruder alarm systems may be worth considering and will sometimes reduce insurance premiums. They need to be easily operated by the users of the building and, with larger buildings, would benefit from being zoned so that parts of the building can be alarmed whilst other parts are being used.

7.5 Awareness and reporting

As mentioned earlier it is important to raise awareness of potential security issues with staff and volunteers, so that people are alert to potential risks. Often attackers visit buildings multiple times to plan their attack and may be deterred if approached. Any suspicious activity should be immediately reported to the police. Regional police forces are supported by dedicated counter-terrorism adviser teams who could be consulted for additional advice.

7.6 Fire

It is worth checking that fire alarms are effectively covering all of your building. Removing all unwanted items that could be used to start a fire, such as old newspapers and boxes, as well as making sure that ignition sources such as petrol for lawnmowers are securely stored away from visitors will make life more difficult for attackers or arsonists.

8.0 Additional information

Here are some links to additional helpful information.

Government guidance and the new Security Industry Authority (SIA)

<https://www.gov.uk/government/publications/martyns-law-the-sias-new-regulatory-role/martyns-law-the-sias-new-regulatory-role>

ProtectUK

The government uses ProtectUK to publish advice for protective security measures and will issue any guidance on Martyn's Law through them.

<https://www.protectuk.police.uk/martyns-law>

ProtectUK also gives access to the National Counter-Terrorism Security Office, Centre for the Protection of National Infrastructure and Police and Regional Counter-Terrorist Units

Run Hide Tell

Counter Terrorism Policing has released guidance that sets out three key steps for keeping safe in the event of a firearms or weapons attack.

<https://www.counterterrorism.police.uk/runhidetell/>

Citizen Aid - The First Five Minutes Count

Those first 5 minutes count, they make the difference, you make the difference. Citizen AID is a simple, clear teaching aid for Immediate Actions and First Aid for a stabbing, bomb incident or mass shooting.

<https://www.protrainings.uk/courses/instructor/citizenaid-instructor-upgrade/videos/overview-of-citizenaid-by-keith-porter>

Appendix 1 – Home Office flow diagram



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

