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Reference College



The Terrorism Act 2025

(protection of Premises)

Martyns Law

Overview

Martyn's Law is also known as the Terrorism (Protection of Premises) Bill

Purpose

Martyn's Law aims to ensure that organisations are prepared to respond effectively in the event of a terrorist incident. It introduces mandatory requirements for security planning, staff training, and protective measures—similar in principle to existing statutory duties for Fire Safety and Health & Safety.

Why It Matters

The legislation is built on the principle that simple, well-planned protective actions can save lives. Improved preparedness through better planning, training, technology, and proportionate security checks can significantly reduce the impact of an attack and enhance overall public safety.

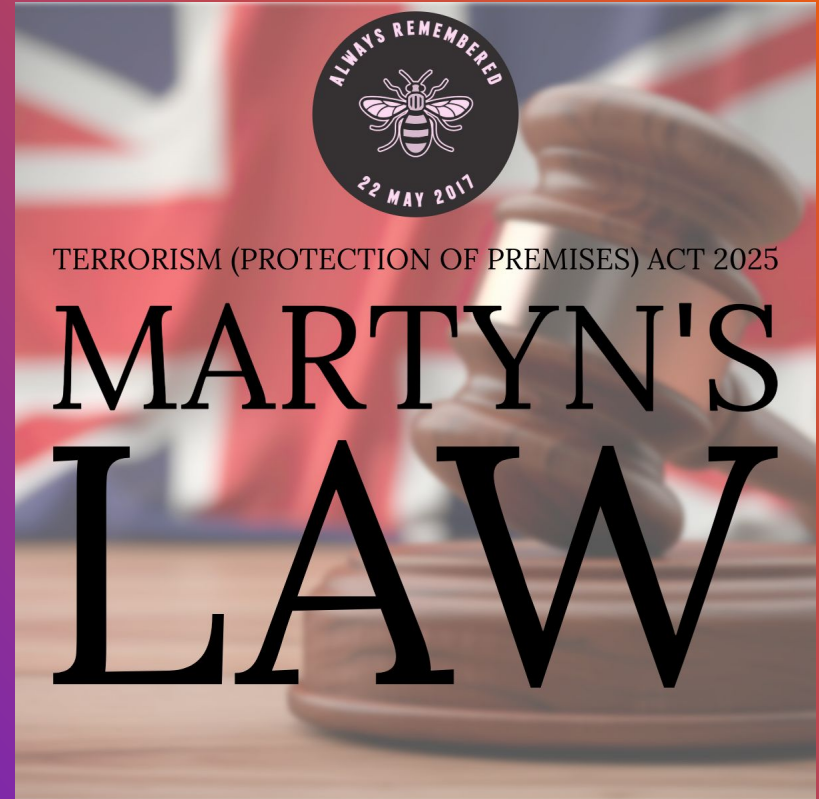
Challenges for the College

Implementing Martyn's Law presents several considerations, including how the College practically meets the requirements, the complexity of our geographical layout, and the need to avoid creating unnecessary fear or anxiety. The challenge is balancing strong protective measures with a professional, calm, and supportive environment.

In essence it was suggested that if more had been done then lives would have been saved

Key Requirements

1. Understanding the tiers
2. Risk Assessment and Planning
3. Training and Awareness
4. Security Measures
5. Collaboration



Understanding the tiers

There are two options standard tier and enhanced tier.

<u>Standard Tier requirements</u>	<u>Enhanced Tier requirements</u>
For premises in the standard tier, the requirements are more modest and are aimed at ensuring readiness/awareness rather than heavy physical security obligations	For larger premises or events, the obligations are more extensive. They include all of the standard tier duties <i>plus</i> additional measures
• The responsible person must notify the regulator (Security Industry Authority, SIA) that they are responsible for a premises in scope. - currently this facility is not up and running • The premises must have in place, <i>so far as reasonably practicable</i>, appropriate public protection procedures that could be expected to reduce physical harm to individuals if an attack occurred. • It emphasises proportionate steps, given the size/use of the premises. For instance, training or instruction rather than formal heavy training obligations.	• Must have in place, <i>so far as reasonably practicable</i>, appropriate public protection measures that could reasonably reduce: (i) the <i>vulnerability</i> of the premises or event to an act of terrorism, and (ii) the <i>risk of physical harm</i> to individuals if an attack occurred. • The responsible person must document the public protection procedures and measures (or proposed measures), and provide that documentation to the SIA. • If the responsible person is not an individual (e.g., a company), they must appoint a designated senior individual (DSI) — someone at senior management level with responsibility for compliance. • Notification to SIA still applies, similar to standard tier.

Understanding the tiers

Key differences

Feature	Standard Tier	Enhanced Tier
Capacity Threshold	~200 to 799 people (for premises)	800+ people expected (premises or event)
Main Focus of Duty	Preparedness and public protection procedures to reduce harm	All of standard duties + reducing vulnerability + documentation + senior management involvement
Documentation & Senior Role	Less prescriptive; focus on instruction/training rather than formalised heavy requirements	More formal: must document procedures and appoint senior person when responsible entity is not an individual
Physical Security Measures	More modest; proportionate to size/use	Likely greater expectation of physical security & consideration of vulnerability reduction (e.g., monitoring, access controls)

Understanding the tiers

Other considerations - Qualifying events

A “**qualifying event**” is defined as a publicly accessible event that:

- Takes place at a qualifying premises or a temporary location;
- Has a capacity of **800 or more people** who could reasonably be expected to be present at the same time; and
- Is open to the public, whether free of charge or ticketed.

In essence, the key trigger for Enhanced Tier requirements is the presence of **800 or more people at any one time**, regardless of whether the venue is permanent or temporary.

Type of Event	Typical Example	Why it's Enhanced Tier
Enrolling days/Graduation ceremonies	In large halls or stadiums with 800+ people	The event's temporary nature doesn't exempt it; crowd size triggers it
Theatre or concert performances	e.g. arenas, large theatres, music halls with 800+ seat	Permanent venues in enhanced tier; events held there must comply too
Music or cultural festivals/ Sporting events	E.g. On campus festivals, outdoor concerts, Pride events, food festivals, football matches, marathons, cycling races, large community tournament	Not always ticketed and unknown numbers can attend, but if you think over 800 will possibly attend it is enhanced tier

Understanding the tiers

Summary

Schools and colleges are currently categorised within the Standard Tier. However, certain events may fall within the Enhanced Tier, depending on their nature and scale. It is therefore essential to review all planned events and ensure that appropriate measures are in place where Enhanced Tier criteria may apply.

Additionally, institutions with more than 800 people on site at any one time may, in future, be reclassified into the Enhanced Tier. While this has not yet been confirmed, it is likely that such a change will be introduced in due course.

Risk Assessment and Planning

All qualifying premises must conduct **terrorism risk assessments**. This needs to take into account;

- Normal day to day activities
- Annual or one off events that may exceed 799 people
- Attractive or Vulnerable Features
- Potential Attack Methods
- Access, Security, and Screening
- Detection and Response Capabilities
- Emergency Procedures & Training
- Interdependencies and Neighbours
- Reasonably Practicable Mitigations
- Documentation & Review



Risk Assessment and Planning

The Risk Assessment Document

Your final document should typically include:

1. **Premises/event details** (location, responsible person, dates, capacity)
2. **Risk overview** (main attack types and vulnerabilities)
3. **Existing measures** (what you already do)
4. **Gaps and additional actions** (what could be improved)
5. **Mitigation plan** with timelines/responsibilities
6. **Record of review and approval** (signed by responsible person or DSI)



Training and Awareness

Staff must undergo **terrorism awareness training**, so they know how to respond in case of an attack.

STANDARD TIER (200–799 capacity)

For standard duty premises, the focus is **awareness and preparedness**.

Staff should understand:

- The **nature of terrorism risks** and how attacks may occur.
- How to **recognise suspicious behaviour** or packages.
- What to **do during an attack** – e.g. *Run, Hide, Tell* principles.
- How to **raise an alarm** and **communicate** with colleagues and emergency services.
- The site's **evacuation** or **lockdown** procedures.



Recommended training sources The **Home Office** and **Counter Terrorism Policing** recommend:

- **ACT Awareness e-Learning** (free, online, ~45 minutes)
Available via [ProtectUK.police.uk](https://protectuk.police.uk)
Covers suspicious behaviour, hostile reconnaissance, and how to respond to incidents.
- **Internal briefings or toolbox talks** – to make it site-specific (e.g. where to assemble, who calls 999, what to do if exits are blocked).

Best practice

- Include it in **staff induction** and refresh annually.
- Keep **records** (dates, names, content).
- Reinforce messages regularly — posters, short videos, “safety moments” in meetings.

Training and Awareness

Enhanced Tier (800+ Capacity or Qualifying Events)

Enhanced Tier venues must meet all Standard Tier requirements, **plus additional obligations**.

Staff — including contractors — must receive training that is proportionate to their role, while senior leaders must have a clear understanding of how to implement, oversee, and review terrorism protection procedures.

In practice, this means training should be **tiered and role-specific**, ensuring that each individual has the appropriate level of awareness and capability for their responsibilities.

Role	Type of Training	What is should Cover
All staff & volunteers	Awareness (e.g. ACT Awareness)	Recognising threats, responding, reporting, communication
Supervisors / managers	ACT Security (more advanced) or Protect UK Classroom sessions	Managing incidents, leading evacuation/lockdown, coordinating with police
Security teams	Specialist Counter Terrorism Security training	Search procedures, hostile reconnaissance, crowd management
Designated Senior Individual (DSI)	Strategic-level training	Legal responsibilities, risk assessment process, security culture, documentation duties

Optional but Strongly Recommended

- **ACT Security** – Ideal for security officers (approximately 1 hour, delivered online or in a classroom).
- **ACT Operational** – Designed for operational managers and supervisors.
- **Tabletop Exercises** – Scenario-based sessions to rehearse responses to potential terrorist incidents.
- **Joint Training** – Collaborative training with local police and emergency services to strengthen multi-agency coordination

Security Measures

STANDARD TIER	ENHANCED TIER
Proportionate “Preparedness” Measures	Proportionate “Protection” Measures
The focus is on readiness and awareness, not major infrastructure or costly systems. The law requires premises to take <i>reasonably practicable steps</i> to reduce the risk of physical harm to individuals during a terrorist attack.	Enhanced tier venues and qualifying events (800+ people) have additional and more formal duties. They must focus on reducing both vulnerability (making it harder for an attack to succeed) and risk of harm (minimising casualties if one does).

Security Measures

Standard Tier – Proportionate “Preparedness” Measures

The Standard Tier focuses on building readiness and awareness, ensuring effective communication systems are in place and that procedures are clearly understood, practiced, and routinely reviewed.

Under the legislation, premises must take reasonably practicable steps to reduce the risk of physical harm to individuals in the event of a terrorist attack.

Core Legal Requirements

- **Notify the Regulator (SIA):** Confirm that the premises fall within scope and are classified as Standard Tier.
- **Provide Terrorism Awareness Training:** Ensure all staff complete appropriate training, such as ACT Awareness eLearning.
- **Develop Clear Public Protection Procedures:** Create simple, written guidance outlining how staff should respond during an incident — for example, lockdown, evacuation, or shelter procedures.
- **Communicate Procedures Effectively:** Ensure all staff understand their responsibilities and know how to implement the procedures.
- **Test, Review, and Update:** Regularly test the procedures, evaluate their effectiveness, and make updates as needed.

STANDARD TIER - Recommended security measures

Procedural Readiness	Clear, concise incident response plan (who does what, where to go)
Training	ACT Awareness for all staff; short drills and briefings annually
Communication	Means to alert staff and visitors quickly (Alertus system, radio, PA, loudhailer)
Physical environment and protective design	Review entry points and exits; maintain clear escape routes; ensure emergency signage
Suspicious activity reporting	Encourage “See it, Say it, Sorted” culture; staff know how to report concerns
Coordination with police	Know your local Counter Terrorism Security Adviser (CTSA); understand local response plans

Security Measures

Enhanced Tier – Proportionate “Protection” Measures

Enhanced Tier venues and qualifying events (800+ attendees) carry additional, more formal responsibilities. The focus extends beyond readiness to actively reduce vulnerability (making it harder for an attack to succeed) and minimise harm (reducing casualties if an attack occurs).

Core Legal Requirements

- **Notify the Regulator (SIA):** Confirm that the premises or event falls under Enhanced Tier.
- **Appoint a Designated Senior Individual (DSI):** Assign a senior person responsible for ensuring compliance.
- **Conduct a Terrorism Risk Assessment:** Prepare and document a **public protection risk assessment**.
- **Implement Public Protection Measures:** Put in place documented measures based on the risk assessment.
- **Provide Role-Specific Training:** Ensure staff receive terrorism protection training appropriate to their responsibilities.
- **Maintain Records:** Keep all relevant documentation and make it available to the SIA upon request.

ENHANCED TIER - Recommended security measures

Governance & Planning	Written terrorism risk assessment; named DSI; annual review
Training	ACT Awareness (all), ACT Security (security teams), tabletop exercises (management)
Perimeter & Access Control	Control vehicle access; install bollards/planters; secure service entrances; staff/contractor screening
Search & Screening	Bag searches, ticket checks, random screening, staff briefings on prohibited items
Crowd Management	Manage entry/exit queues; avoid congestion at choke points; design safe assembly and evacuation areas
Surveillance & Monitoring	Maintain and monitor CCTV; ensure good lighting; cover key approaches
Communication Systems	Reliable internal comms, PA, radio links; clear emergency codes
Physical Protection	Strengthen glazing, lockable doors, secure rooms for “invacuation”
Emergency Response	Detailed, rehearsed plans for lockdown, evacuation, or shelter-in-place; coordination with emergency services
Post-incident procedures	Welfare, communications, and recovery plans

Security Measures

The key consideration for the College is understanding where it will be positioned within the new legislation.

Under Martyn's Law, Enhanced-tier venues may be required to introduce additional physical security measures—such as security checks, barriers, and surveillance—based on assessed levels of risk. At present, schools and colleges fall within the Standard Tier. However, institutions with more than 800 people on site at any one time may be reclassified into the Enhanced Tier in the not to distant future.

This has not yet been confirmed, and there remains limited guidance available from the Department for Education at this stage.

Collaboration

The College must work in close partnership with relevant local authorities, neighbouring institutions, and wider community stakeholders, taking full account of the potential impact on the local area. The legislation makes it explicitly clear that:

Responsible persons are required to take “reasonably practicable” steps to prepare for and protect the public from terrorist attacks — including through effective coordination with relevant persons, authorities, and emergency services.

Although “collaboration” is not listed as a standalone duty within the Act, it is a fundamental requirement embedded throughout key components of the legislation, including:

- The risk assessment process, which requires consideration of external interfaces and shared risks;
- Public protection procedures, which must align with local emergency plans and multi-agency arrangements; and
- Home Office and Security Industry Authority (SIA) guidance, both of which emphasise the importance of multi-agency cooperation.

In short, collaboration is not optional — it is an essential part of meeting the “reasonably practicable” standard.

Collaboration

Key Partners to Collaborate With

- A. Local Police & Counter Terrorism Security Advisers (CTSAs)
- B. Local Authority / Emergency Planning Teams
- C. Fire & Rescue Services
- D. Ambulance / NHS Local Resilience Networks
- E. Other On-Site Businesses or Tenants
- F. Contractors, Security Providers & Event Partners
- G. Neighbouring Premises & Landowners
- H. Regulator — Security Industry Authority (SIA)



Collaboration

What Has Been Done

Devon and Cornwall Police, have carried out an initial review and provided advice and feedback. This has now been actioned, and our procedures have been updated accordingly.

We are also planning a tabletop exercise with key multi-agency partners to test our collective response and clarify how each organisation would operate together should an incident occur on campus. Attendance from City College Plymouth will be limited to a small group, as the exercise will focus on the response of external authorities and could present a security risk if the information were widely shared.

Following the exercise, the information and learning will be *sanitised* and reported back to ELT.

What Still Needs to Be Done

- **Neighbouring Institutions**

We need to assess how an incident on our site could impact neighbouring organisations — and equally, how an incident at a neighbouring site could affect us. Clear communication channels and joint protocols will need to be developed.

- **Contractors**

We must consider the expectations and responsibilities of contractors working on site, ensuring they understand and comply with relevant security and emergency procedures.

- **External Hirers**

For those hiring College spaces — particularly large groups who may fall under Martyn's Law requirements — we need to ensure appropriate checks, expectations, and procedural alignment are in place.

- **Mutual Support**

We should identify what support we can offer one another, both during an incident and throughout the recovery phase.

Collaboration

Practical Collaboration Activities

Activity	Description	Frequency
Joint Risk Assessment Review	Review terrorism risk assessment with CTSA or SAG input	Annually or when operations change
Tabletop Exercises	Multi-agency scenario testing (lockdown, evacuation)	Every 12–18 months
Information Sharing	Join local Business Crime Reduction Partnership or ProtectUK network	Continuous
Joint Communication Testing	Test contact methods with police, fire, neighbours	Every 6–12 months
Post-Incident Review	Debrief after real incidents or near misses	As needed

We have already made significant progress and, in many areas, are far ahead of comparable institutions. However, this in itself creates a degree of risk. For example, if a neighbouring institution such as DHSB were to experience a major incident and were not adequately prepared, the impact could quickly extend to our campus — and we may not be aware of it until it is too late.

Strong collaboration across the local education and public-sector network is essential. Effective partnership working will enhance everyone's ability to respond to an incident and reduce shared vulnerabilities. It would therefore be highly beneficial for colleagues who have existing contacts within the local area to reach out and help strengthen these relationships further.

Summary

It is important to emphasise that all requirements under Martyn’s Law are governed by the principle of proportionality — specifically, what is considered “**reasonably practicable.**”

This principle applies across both tiers of the legislation:

- Organisations must take measures that are reasonable and achievable given their size, resources, and overall risk profile.
- There is **no expectation** to implement costly or highly sophisticated systems (such as airport-style screening) unless the specific risks associated with the venue genuinely justify it.

For the College, proportionality will likely be an evolving consideration, shaped by our scale, the number of people on site, and our current and future locations.

There is also a concern that as traditional high-risk venues increase their security, schools, colleges, and universities may become more attractive targets. This potential shift in risk profile needs to be recognised and factored carefully into our planning and decision-making.

TIER	CORE OBJECTIVE	KEY MEASURES
STANDARD	Awareness and harm reduction	Staff training, simple procedures, basic readiness
ENHANCED	Reduce vulnerability and harm	Formal risk assessment, documented plans, trained DSI, layered physical/procedural protection



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Thank you
Any questions?