

To: Communities and Housing Policy Board

On: 12 March 2024

Report by: Director of Environment, Housing & Infrastructure

Heading: Consultation on Martyn's Law - Terrorism (Protection of Premises) Bill - Standard Tier Government consultation

1. Summary

- 1.1 Martyn's Law is a proposed piece of legislation aimed at enhancing security measures at public venues and spaces in the United Kingdom. The law is named after Martyn Hett, one of the victims of the Manchester Arena bombing in May 2017. Martyn's Law campaign was spearheaded by Martyn's mother, Figen Murray, who has been advocating for improved security standards at public venues to prevent similar tragedies.
 - 1.2 A consultation on the proposed legislation was carried out in 2021 and significant feedback was received on the application of the proposals in relation to standard tier premises, which are premises with capacity of 100 - 799 individuals. In response to this feedback the Government has reviewed the approach to the Standard Tier, proposing changes to the requirements to ensure that they are proportionate and clear.
 - 1.3 In February 2024, the UK Government launched a consultation to ensure the public can share their views on these proposals for the Standard Tier, which will support policy decisions prior to the legislation's introduction to Parliament.
 - 1.4 This consultation is solely focussed on the requirements proposed in relation to standard tier premises. This consultation began on 5 February 2024 and will end on 18 March 2024. The link to the UK Government consultation document is - https://assets.publishing.service.gov.uk/media/65c0dcd3c4319100141a456e/05.02.24_Martyn_s_Law_Standard_Tier_Consultation_.pdf and the proposed response to the consultation from Renfrewshire Council is attached as appendix 1 to this report.
 - 1.5 The Council are responding to this consultation as an organisation who have venues which fall within the highlighted category.
-

2. Recommendations

It is recommended that the Board:

- 2.1 Approves the proposed consultation response from Renfrewshire Council as detailed within Appendix 1, and
 - 2.2 Notes that any further progress with the legislation and associated implementation will be reported through the Service Update reports to the Board.
-

3. Background

- 3.1 The core principle of Martyn's Law is to make it mandatory for public venues and spaces to assess and improve their security measures to mitigate the risk of terrorist attacks. This includes implementing measures such as bag checks, metal detectors, CCTV cameras, staff training in emergency response procedures, and collaboration with law enforcement agencies.
- 3.2 The proposed Terrorism (Protection of Premises) Bill aims to ensure that venues and spaces across the UK have appropriate security measures in place, thereby enhancing public safety and resilience against potential threats. While specific details of the legislation are still being developed, the overarching goal remains to prevent future terrorist attacks and protect the public in crowded spaces.
- 3.3 The proposals set out different requirements for i) Standard Tier premises, which would have a capacity of 100-799 individuals, and ii) Enhanced Tier premises and qualifying public events, both of which have a capacity of 800 individuals or more.
- 3.4 To ensure this legislation can meaningfully enhance public safety whilst remaining proportionate, the UK Government requested the Home Affairs Select Committee (HASC) conduct pre-legislative scrutiny of the published draft Bill. Evidence sessions were completed in June 2023 and a report was produced by HASC on 27 July 2023 scrutinising the proposed measures. Throughout the scrutiny period, and over the summer, the UK Government have continued to engage directly with stakeholders across a variety of sectors, presenting an overview of the proposed legislation, supporting understanding, and seeking feedback on proposals.
- 3.5 The UK Government has considered feedback provided as part of HASC's pre legislative scrutiny process, as well as engagement from across the sectors within scope of the proposed Bill. Significant feedback was received on the Terrorism (Protection of Premises) Bill - Standard Tier Consultation 3 application of the proposals in relation to smaller premises (with capacity of 100 to 799 individuals).
- 3.6 It is now proposed that Standard Tier premises must:
 - Notify the regulator that they are, or have become, responsible for premises within the scope of the Bill (and so subject to the relevant requirements),

- Have in place procedural measures that could be expected to reduce, so far as reasonably practicable the risk of physical harm to individuals at the premises in the event of an attack.
- Ensure employees will be sufficiently instructed or trained to carry out associated procedures efficiently.

3.7 Officers have completed a draft response to the current consultation which is attached at appendix 1 for the Board's consideration.

Implications of the Report

1. **Financial** – None
2. **HR & Organisational Development** – None.
3. **Community/Council Planning** – None
4. **Legal** – None.
5. **Property/Assets** – None.
6. **Information Technology** – None.
7. **Equality & Human Rights** –
 - (a) The Recommendations contained within this report have been assessed in relation to their impact on equalities and human rights. No negative impacts on equality groups or potential for infringement of individuals' human rights have been identified arising from the recommendations contained in the report. If required following implementation, the actual impact of the recommendations and the mitigating actions will be reviewed and monitored, and the results of the assessment will be published on the Council's website.
8. **Health & Safety** – None.
9. **Procurement** – None.
10. **Risk** – None.
11. **Privacy Impact** – None.
12. **COSLA Policy Position** – N/A.
13. **Climate Risk** – N/A.

List of Background Papers

- (a) None

Author: Gwyneth Heaney, Climate and Public Protection Manager
Email: Gwyneth.heaney@renfrewshire.gov.uk

Renfrewshire Council response to the Martyn's Law - Terrorism (Protection of Premises) Bill -Standard Tier Government consultation

Full consultation can be viewed at:

https://assets.publishing.service.gov.uk/media/65c0dcd3c4319100141a456e/05.02.24_Martyn_s_Law_Standard_Tier_Consultation_.pdf

Renfrewshire Council Consultation response

Section 1: Information about you and your organisation

QA. Which of the following best describes you or your organisation?

Please cross or highlight one box only and then go to the specified question.

- 1 I own or operate premises **7** Go to QB
- 2 I own or operate an event **7** Go to QB
- 3 I am responsible for security at premises or events **7** Go to QB
- 4 I work at a premises or event in scope, but do not own or operate it **7** Go to QE
- 5 I am a security consultant **7** Go to QB
- 6 I am an interested member of the public **7** Go to QG
- 98 Other **7** Go to QG
- 99 Don't know **7** Go to QG
- 97 I prefer not to say **7** Go to QG

QB. Do you own and/or operate any premises that would fall within the Standard Tier?



To be in scope for Standard Tier:

- Premises and events must be accessible to the public.
- Premises must be used for a purpose listed in the Bill (e.g. entertainment and leisure, retail, food and drink).
- Have a capacity of 100-799 individuals.

Please cross or highlight one box only and then go to the specified question.

- 1 Yes **7** Read the following information box and then go to QC
- 2 No **7** Read the following information box and then go to QC
- 99 Don't know **7** Read the information box below and then go to QC
- 3 I don't own or operate any premises **7** Read the following information box and then go to QE



- If you own or operate multiple premises, please answer the questions in the rest of this survey by reference to one particular Standard Tier site.

QC. IF YOU ANSWERED 'YES' AT QB: What is the estimated capacity of your Standard Tier premises based on capacity calculations you already have in place?

IF YOU ANSWERED 'NO' OR 'DON'T KNOW' AT QB: What is the estimated capacity of your premises based on capacity calculations you already have in place? If you own or operate multiple premises, please provide an answer based on your typical capacity size.

Please cross or highlight one box only and then go to QD.

- 1 Less than 100
- 2 100-199
- 3 200-299
- 4 300-399
- 5 400-499
- 6 500-599
- 7 600-699
- 8 700-799
- 9 800 or more (i.e. Enhanced Tier premises)
- 99 Don't know
- 11 Not calculated presently
- 12 I don't own or operate any premises

QD. IF YOU ANSWERED 'YES' AT QB: How many people work for you or your organisation (whether paid or not) at your chosen Standard Tier site (in relation to which you are answering this survey)?

IF YOU ANSWERED 'NO' OR 'DON'T KNOW' AT QB: How many people work for you or your organisation (whether paid or not)? If you own or operate multiple premises, please provide an answer based on your typical capacity size.

Please cross or highlight one box only and then go to QE.

- 1 Zero
- 2 1-4
- 3 5-9
- 4 10-24
- 5 25-49
- 6 50-99
- 7 100-199
- 8 200-399
- 9 400-499
- 10 500 or more
- 11 I don't own or operate any premises
- 99 Don't know

QE. Which of the following best describes the nature of your organisation?

Please cross or highlight one box only and then go to QF.

- 1 Company
- 2 Sole trader
- 3 Partnership
- 4 Not for profit
- 5 Local government
- 6 Unincorporated association
- 98 Other **7** Please specify in the box below 
- 99 Don't know
- 97 Prefer not to say

QF. In which of the following sectors do you or your organisation primarily operate?

Please cross or highlight one box only and then go to QG.

- 1 Retail, e.g. stores or shopping centres
- 2 Hospitality and nightlife, e.g. bars, pubs, restaurants, cafés, nightclubs and other public clubs
- 3 Entertainment, e.g. theatres, cinemas, and concert halls and arenas
- 4 Sports grounds
- 5 Recreation and leisure, e.g. public sports/leisure centres, ice rinks and gyms
- 6 Public libraries, museums and galleries
- 7 Public conference centres, exhibition halls and other venues for hire
- 8 Visitor attractions
- 9 Hotels, holiday parks and similar holiday accommodation
- 10 Places of worship
- 11 Healthcare
- 12 Education and childcare
- 13 Public transport, including trains stations, ports and airports
- 14 Public services and facilities
- 15 Village hall/community centre
- 98 Other sector
- 99 Don't know
- 97 Not applicable

QG. In which part of the UK are you based?

Please cross or highlight one box only and then go to Section 2.

- 1 North East
- 2 North West
- 3 Yorkshire and the Humber
- 4 East Midlands
- 5 West Midlands
- 6 East of England
- 7 South East exc. London
- 8 London
- 9 South West
- 10 Scotland
- 11 Wales
- 12 Northern Ireland
- 13 I'm not based in the UK

Section 2: Your views on the proposed Standard Tier



- Thank you for your responses so far. The next section of this survey is about the proposed Standard Tier
- The current threat picture is complex, evolving, and enduring, with terrorists choosing to attack a broad range of locations. Martyn's Law will ensure premises in the UK are better prepared for and protected from terrorist attacks, therefore reducing their impact.
- The UK Government's view is that the Standard Tier will drive good preparedness outcomes.

Q1. To what extent do you agree or disagree that those responsible for premises within the Standard Tier should have a legal obligation to be prepared for a terrorist attack?

Please cross or highlight one box only and then go to the specified question.

- 1 Strongly agree [➤ Go to the information above Q2](#)
- 2 Agree [➤ Go to the information above Q2](#)
- 3 Neither agree nor disagree [➤ Go to the information above Q2](#)
- 4 Disagree [➤ Go to Q1a](#)
- 5 Strongly disagree [➤ Go to Q1a](#)
- 99 Don't know [➤ Go to the information above Q2](#)

Q1a. Which of the following best describes why you disagree that those responsible for premises within the Standard Tier should have a legal obligation to be prepared for a terrorist attack?

Please cross or highlight one box only and then go to the information above Q2.

- 1 I believe it is only for the Government to be prepared to reduce the impact of terrorism
- 2 I don't believe the obligation should be legal
- 3 I believe only larger premises should have a legal obligation
- 4 I don't believe that premises of any size should have a legal obligation
- 5 I don't believe that there should be any responsibility for premises to be prepared for a terrorist attack
- 98 Other **7** Please specify in the box below 
- 99 Don't know



- As outlined in paragraph 18, we (the UK Home Office) have revised the requirements in the Standard Tier. Those responsible for Standard Tier premises will be required to have in place reasonably practicable procedures to follow in the event of an attack. We have also removed the requirement for specific terrorism protection training. Instead, training or instruction will be what is sufficient and appropriate to ensure procedures are effectively in place in light of their circumstances and that staff are aware of the actions to take and protocols to follow in the event of an attack. Guidance will assist those responsible for standard duty premises.

Q2. To what extent do you agree or disagree that ‘the revised requirements for the Standard Tier are more appropriate for the broad spectrum of premises in scope, as outlined at paragraph 18 (e.g. village halls to a 799-seater theatre), than the previous requirements outlined in the Draft May 2023 Bill’ (key changes outlined at paragraphs 40 and 41)?

Please cross or highlight one box only and then go to the specified question.

- 1 Strongly agree [➤ Go to Q2a](#)
- 2 Agree [➤ Go to Q2a](#)
- 3 Neither agree nor disagree [➤ Goto Q3](#)
- 4 Disagree [➤ Go to Q2b](#)
- 5 Strongly disagree [➤ Go to Q2b](#)
- 99 Don't know [➤ Go to Q3](#)

Q2a. Why do you agree that the revised requirements are more appropriate than the previous requirements?

Please cross or highlight all boxes that apply and then go to Q3.

- 1 I think the proposed changes make the Standard Tier clearer
- 2 I think the proposed changes remove unnecessary administrative burden for small premises
- 3 I think the proposed changes are more appropriate for the broad spectrum of organisations in scope
- 4 I think the proposed changes will be more proportionate for businesses
- 98 Other **7** Please specify in the box below 
- 99 Don't know

Q2b. Why do you disagree that the revised requirements are more appropriate than the previous requirements?

Please cross or highlight all boxes that apply and then go to Q3.

- 1 I don't think the proposed changes make the Standard Tier clearer
- 2 I don't think the proposed changes go far enough to remove unnecessary burdens for small premises
- 3 I don't think the proposed changes are more appropriate for the broad spectrum of organisations in scope
- 4 I don't think the proposed changes will be more proportionate for businesses
- 98 Other **7** Please specify in the box below 
- 99 Don't know

Q3. How successful, if at all, do you think the revised Standard Tier requirements will be at improving feelings of safety for staff and visitors at premises within the Standard Tier?

Please cross or highlight one box only and then go to the specified question.

- 1 Very successful **7** Go to Q4
- 2 Moderately successful **7** Goto Q4
- 3 Slightly successful **7** Go to Q3a
- 4 Not at all successful **7** Go to Q3a
- 99 Don't know **7** Go to Q4

Q3a. Why do you think the Standard Tier requirements will not be or will only be slightly successful at improving feelings of safety for staff and visitors at premises within the Standard Tier?

Please cross or highlight one box only and then go to Q4.

- 1 Premises already do the things that the Standard Tier would now require
- 2 I don't think the revised requirements will have any positive impact
- 3 I think other things are required to improve feelings of safety for staff and visitors
- 98 Other **7** Please specify in the box below 
- 99 Don't know

Q4. How easy or difficult do you think it will be for those responsible for Standard Tier premises to take forward the revised requirements (outlined in paragraph 18)?

Please cross or highlight one box only and then go to the specified question.

- 1 Very easy **7** Go to Q5
- 2 Easy **7** Go to Q5
- 3 Neither difficult noreasy **7** Go to Q5
- 4 Difficult **7** Go to Q4a
- 5 Very difficult **7** Go to Q4a
- 99 Don't know **7** Go to Q5

Q4a. Why do you think the revised requirements will be difficult for those responsible for Standard Tier premises to take forward?

Please cross or highlight all boxes that apply and then go to Q5.

- 1 The requirements are too complicated to implement
- 2 The requirements are too burdensome (in terms of time/effort) to implement
- 3 The requirements are too costly to implement
- 98 Other  Please specify in the box below 
- 99 Don't know

Q5. What unintended consequences, if any, do you think could result from taking forward the revised Standard Tier requirements?

Please write your answer below  OR cross or highlight one box only and go to the next information box.

- 1 I don't think there will be any unintended consequences
- 99 Don't know



- Information in this box relates to Q6, Q6a and Q7.
- Q6 should only be answered by Standard Tier premises operators/owners excluding consultants – this applies if you answered with option 1, 2 or 3 at QA and option 1 at QB. Please read the following information and then answer Q6.
- All others should read the information in this box and then go to Q7.
- Following on from Impact Assessment detail in paragraphs 42-45, below is a summary of the costs of the Standard Tier of Martyn's Law:
- The Standard Tier has an estimated total cost of between £387 million and £1.63 billion with a central estimate of £860 million (PV/Present Value) over the full appraisal period of 10 years. This is an economic cost from working hours being taken up to complete counter-terrorism planning and training, with no financial burden on sites. For an individual site, it is estimated to cost between £160 and £525 per year, with a central estimate of £310 per year. This is likely an upper estimate, with the addition of a reasonably practicable test meaning that some sites will face reduced costs. For more information, you can read Annex A.

Q6. How concerned, if at all, are you that the cost of meeting the Standard Tier requirements will affect your organisation's financial ability to continue operating?

Please cross or highlight one box only and then go to the specified question.

- 1 Not at all concerned **➤ Go to Q7**
- 2 Slightly concerned **➤ Go to Q7**
- 3 Somewhat concerned **➤ Goto6a**
- 4 Very concerned **➤ Go to Q6a**
- 5 Extremely concerned **➤ GotoQ6a**
- 99 Don't know **➤ Go to Q7**

Q6a. You indicated that you're concerned about your organisation's ability to meet the cost of Standard Tier requirements. Please help us understand your concerns by providing detail below.

Please write your answer below ✍ and then go to Q7.

99 <input type="checkbox"/> Don't know

Q7. Given this cost assessment, how would you think any costs of the Standard Tier should be met?

Please cross or highlight one box only ☒ and then go to the information above Q8.

- 1 **All** the cost should be met by the **customers** of the premises where possible
- 2 **Most** of the cost should be met by **customers** of the premises
- 3 The costs should be **shared** equally by the premises owner/operator and the customers of the premises
- 4 **Most** of the cost should be **absorbed** by the premises owner/operator and only a minimum passed on to the customers
- 5 **All** of the cost should be **absorbed** by the premises owner/operator and none should be met by the customers of the premises
- 99 Don't know



- As outlined in paragraphs 29-32, the training expected as a result of the proposals is now limited to that which forms part of ensuring that there are effective procedural measures to reduce the risk of harm in the event of a terrorist attack. Workers must have sufficient awareness of what they need to do in the event of an attack, i.e. the procedure to be followed, for such measures to be in place. Organisations should ensure training is right for their specific needs and relevant to the roles of specific staff.

Q8. Do you think the new approach to training places more or less burden on Standard Tier organisations compared to the previous approach (as outlined in paragraphs 40 and 41)? By “burden”, we mean any burden including financial, time, effort or other.

Please cross or highlight one box only and then go to the specified question.

- 1 Much more burden with the new approach **7** Go to Q8a
- 2 More **7** Go to Q8a
- 3 About the same **7** Go to the information above Q9
- 4 Less **7** Go to the information above Q9
- 5 Much less burden with the new approach **7** Go to the information above Q9
- 99 Don't know **7** Go to the information above Q9

Q8a. Why do you think there is more burden on Standard Tier organisations with the new approach compared to the previous approach? Please provide detail below.

Please write your answer below ✍ OR cross or highlight one box only and then go to the information above Q9.

99 <input type="checkbox"/> Don't know



- Q9 should only be answered by Standard Tier premises operators/owners or those who are security consultants or are responsible for security at premises or events – this applies if you answered with option 3 or 5 at QA or option 1 at QB. Please read the following information box and then answer Q9.
- All others should go to Q10.



- Standard Tier requirements will focus on procedures to be enacted in the event of an attack as set out at paragraph 22. These surround evacuation, invacuation, securing the premises and communicating with individuals on the premises. Security partners advise that consideration of these activities, in the event of an attack, will lead to the most relevant and effective actions to save lives. These procedures focus on activities that will help to keep people away from danger.

Q9. We'd like to hear about any other procedures that could be utilised in Standard Tier premises were a terrorist attack to occur further to the above (i.e. other than evacuation, invacuation, lockdown and communications procedures). Please type them in the space below.

Please write your answer below  and then go to Q10.

As part of our existing business continuity plans Renfrewshire Council have in place "Council Security Threats Guidance". As part of this there are existing arrangements in place to identify threats, as well as evacuation, invacuation and lockdown procedures



Q10. Do you think the Standard Tier procedures in Martyn’s Law place more or less burden on Standard Tier premises compared to procedures for Health & Safety and Fire Safety? By “burden”, we mean any burden including financial, time, effort or other.

Please cross or highlight one box only and then go to the specified question.

- 1 Much more burden in Martyn’s Law than for Health & Safety and Fire Safety **7**
Go to Q10a
- 2 More **7** Go to Q10a
- 3 About the same **7** Go to Q10b
- 4 Less **7** Go to Q10c
- 5 Much less burden in Martyn’s Law than for Health & Safety and Fire Safety **7**
Go to Q10c
- 99 Don’t know **7** Go to the information above Q11

Q10a. Why do you say that the Standard Tier procedures in Martyn’s Law will place more burden on Standard Tier premises compared to procedures for Health & Safety and Fire Safety? Please provide detail below.

Please write your answer below ✍ OR cross or highlight one box only and then go to the information above Q11.

99 Don’t know

Q10b. Why do you say that the Standard Tier procedures in Martyn's Law will place about the same burden on Standard Tier premises compared to procedures for Health & Safety and Fire Safety? Please provide detail below.

Please write your answer below  and then go to the information above Q11.

Through business continuity plans, local authorities already consider many of the elements covered within the standard tier procedures including identifying threats, invacuation, evacuation and lockdown procedures.

Q10c. Why do you say that the Standard Tier procedures in Martyn's Law will place less burden on Standard Tier premises compared to procedures for Health & Safety and Fire Safety? Please provide detail below.

Please write your answer below  and then go to the information above Q11.



- Q11 and Q12 should only be answered by Standard Tier premises operators/owners – this applies if you answered with option 1 at QB and any of options 2-8 at QC.
- All others should go to the information box after Q12a.

Q11. If volunteers work at your premises, who is responsible for planning Health & Safety and Fire Safety policies and procedures?

Please cross or highlight one box only and then go to Q12.

- 1 Only paid employees are responsible
- 2 Volunteers are responsible in the same way as paid employees
- 3 Volunteers are responsible but not in the same way as paid employees
- 97 Not applicable – there are no volunteers working at my premises
- 99 Don't know

Q12. If volunteers work at your premises, what arrangements do you make for training on Health & Safety and Fire Safety?

Please cross or highlight one box only and then go to the specified question.

- 1 Only paid employees complete mandatory training **➤ Go to the information box after Q12a**
- 2 Volunteers are trained in the same manner as paid employees **➤ Go to the information box after Q12a**
- 3 Volunteers undertake different training from paid employees **➤ Go to Q12a**
- 97 Not applicable – there are no volunteers working at my premises **➤ Go to the information box after Q12a**
- 99 Don't know **➤ Go to the information box after Q12a**

Q12a. How does training on Health & Safety and Fire Safety for volunteers differ, if at all, from that for paid employees? Please provide detail below.

Please write your answer below ✍ OR cross or highlight one box only ☒ and then go to the information box below.

--


