



Home Office

Terrorism (Protection of Premises) Bill - Standard Tier

Government consultation

This consultation begins on 5 February 2024

This consultation ends on 18 March 2024

About this consultation

To:

This consultation is open to the public, and is targeted at organisations, businesses, local and public authorities, and/or individuals who own or operate publicly accessible premises or events that the proposed Terrorism (Protection of Premises) Bill would potentially affect. In particular, it seeks views from those responsible for the smaller premises which would fall within the Standard Tier.

The proposed Bill would impose requirements in relation to certain premises and events to increase their preparedness for, and protection from, a terrorist attack by requiring them to take proportionate steps, depending on the size and nature of the activities that take place at their premises.

The proposed requirements would apply to those responsible for qualifying public premises and qualifying public events. They might be individuals but, in most cases, would likely be a business or other organisation. If premises or an event did not meet certain prescribed qualifying conditions, then the proposed requirements would not apply in relation to them. One of the conditions for premises would be that they be wholly or mainly used for a listed purpose, such as the provision of entertainment and leisure facilities to the public.

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.

This consultation is **solely focussed on the requirements proposed in relation to standard duty premises, which is referred to as the “Standard Tier”**.

We welcome responses from anyone with an interest in or experience of the areas being consulted on within this consultation. The consultation relates to the United Kingdom only.

Duration:

From 05/02/24 to 18/03/24

Enquiries (including requests for the paper in an alternative format) to:

Email: MartynsLaw@homeoffice.gov.uk
Or
Terrorism (Protection of Premises) Bill Consultation
Protect and Prepare 4th Floor Peel Building,
Homeland Security Group
Home Office
2 Marsham Street,
London, SW1P 4DF

How to respond:

The survey will take around 10 minutes to complete, depending on how much detail you give. If you wish to take part, you will be required to complete the survey in one sitting.

Please submit your response by 18 March 2024

To help us analyse the responses please use the online system wherever possible: [\[Online survey link\]](#)

If for exceptional reasons, you are unable to use the online system, for example because you use specialist accessibility software that is not compatible with the system, you may request and complete a Word document version of the form by email.

Response paper:

A response to this consultation will be published online via GOV.UK, once the Bill is introduced to Parliament.

Questionnaire

About the questionnaire and how the data will be used

The survey will take around 10 minutes to complete, depending on how much detail you give.

Please submit your response by 18th March 2024.

To help us analyse the responses please use the online system wherever possible:

[\[Online survey link\]](#)

This research is being conducted by Verian, on behalf of the UK Home Office, to understand views towards the proposed Standard Tier requirements. Verian's privacy policy can be found here: <https://www.veriangroup.com/uk-surveys>

The data you submit in the survey will be confidential and used only for the research purpose of understanding views towards the proposed Standard Tier requirements. The survey does not ask for any personally identifiable information, and therefore only anonymous survey data will be shared with the Home Office. We ask that you do not provide any personal data in the survey. If you wish to contact the Home Office directly about this consultation, you can contact:

Email: MartynsLaw@homeoffice.gov.uk

Or

Terrorism (Protection of Premises) Bill Consultation
Protect and Prepare 4th Floor NE, Peel Building,
Homeland Security Group
Home Office
2 Marsham Street,
London, SW1P 4DF

Participation in this survey is entirely voluntary. If at any point you wish to withdraw from the survey, you are free to do so without obligation.

Research conducted by Verian is in accordance with the MRS Code of Conduct.

How do I fill out the questionnaire?

1. Please use the [online system](#) wherever possible. If you are unable to use the online system, please send this questionnaire by email to MartynsLaw@homeoffice.gov.uk or by post to: Terrorism (Protection of Premises) Bill Consultation, Protect and Prepare 4th Floor NE, Peel Building, Homeland Security Group, Home Office, 2 Marsham Street, London, SW1P 4DF
2. Most questions can be answered by putting a cross in the box next to or **highlighting** the answer that applies to you
3. Some questions will ask you to: **cross or highlight one box only** and some will ask you to: **cross or highlight all boxes that apply**
4. Some questions include space for you to answer in your own words to provide more detail about a particular subject. You will be asked to either: **specify in the box below** ✍ or to: **write your answer below** ✍
5. Some questions may not apply to you, and you will be directed to the next one that does by following an arrow like this: **→ Go to QE**
6. Further information is provided in boxes indicated by **i** which includes additional information about the topic and in some cases instructions on who should answer the questions which follow. Please read these carefully.
7. Please try to answer every question that applies to you. If you cannot remember or do not know, please cross or highlight the relevant box where shown or leave the question blank.



- Throughout the questionnaire, there are references to paragraphs numbers. These relate to the paragraphs in 'The Proposals' which you can refer back to.

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 → Go to QB
- 2 I own or operate an event → Go to QB
- 3 I am responsible for security at premises or events → Go to QB
- 4 I work at a premises or event in scope, but do not own or operate it → Go to QE
- 5 I am a security consultant → Go to QB
- 6 I am an interested member of the public → Go to QG
- 98 Other → Go to QG
- 99 Don't know → Go to QG
- 97 I prefer not to say → 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 → Read the following information box and then go to QC
- 2 No → Read the following information box and then go to QC
- 99 Don't know → Read the information box below and then go to QC
- 3 I don't own or operate any premises → 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.
- This survey is about Standard Tier premises, but we still welcome your views even if you do not own or operate Standard Tier premises.

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 → 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

NFCC is the professional voice of the UK fire and rescue services and has a national-level presence and remit.

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. Those responsible for Standard Tier premises will be required to undertake simple yet effective activities designed to increase staff awareness of the right protocols and procedures to follow in the event of a suspected attack. The ultimate aim of this approach is to reduce harm to staff and the general public.

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 → 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 → Go to 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 → Please specify in the box below ✍
- 99 Don't know

The requirements are less burdensome for smaller businesses and premises relying on volunteers than the previous requirements outlined in the Draft May 2023 Bill as the requirements for specific terrorism protection training and the standard terror evaluation have been removed.

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 → 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 → Go to Q4
- 2 Moderately successful → Go to Q4
- 3 Slightly successful → Go to Q3a
- 4 Not at all successful → Go to Q3a
- 99 Don't know → 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 → 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 → Go to Q5
- 2 Easy → Go to Q5
- 3 Neither difficult nor easy → Go to Q5
- 4 Difficult → Go to Q4a
- 5 Very difficult → Go to Q4a
- 99 Don't know → 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

Although the requirements are less burdensome for smaller businesses than the previous requirements outlined in the Draft May 2023 Bill, the need to notify the Regulator that they are, or have become, responsible for premises within scope of the Bill remains a burden for all venues, and particularly for smaller venues.

Furthermore, there is a large difference in resources in paid/voluntary staff in standard tier premises with a capacity for 100 individuals compared to a capacity of premises with 799 individuals. There are also differences in risk for these premises, and as such there is a need for a consistent and risk-based approach.

As noted in paragraph 26, reasonably practicable procedures might look different at a theatre compared to a community hall and this should be recognised in the accompanying guidance.

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.

One unintended consequence of smaller premises focusing their resources on meeting the revised standard tier requirements is that they could potentially divert resources, both financial and in terms of personnel, towards counterterrorism measures at the

expense of fire safety. Guidance should therefore state that venues should continue to prioritise fire safety alongside security measures to ensure they do not conflict but work side by side with equal importance.

1	<input type="checkbox"/>	I don't think there will be any unintended consequences
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99	<input type="checkbox"/>	Don't know
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- 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 → Go to 6a
- 4 Very concerned → Go to Q6a
- 5 Extremely concerned → Go to Q6a
- 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 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 → Go to Q8a
- 2 More → Go to Q8a
- 3 About the same → Go to the information above Q9
- 4 Less → Go to the information above Q9
- 5 Much less burden with the new approach → Go to the information above Q9
- 99 Don't know → 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 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.

99 Don't know

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 →
Go to Q10a
- 2 More → Go to Q10a
- 3 About the same → Go to Q10b
- 4 Less → Go to Q10c
- 5 Much less burden in Martyn’s Law than for Health & Safety and Fire Safety →
Go to Q10c
- 99 Don’t know → 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.

The Standard Tier procedure in Martyn’s Law requires each venue to register with the regulator which is not the case with procedures for fire safety.

- 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.

99 Don't know

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.

99 Don't know



- 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.

99 Don't know



- Thank you for responding to the consultation survey. You have answered all questions.



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