

How will the Protection of Premises Act impact the industry?



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#AEVconference2025

Notes from session 3 at AEV Conference 2025

How will the Protection of Premises Act impact the industry. Michelle Russell, CEO – SIA.

The discussion focuses on the upcoming implementation of Martyn's Law, a new UK protective-security legislation that introduces two compliance tiers for venues: standard (200+ capacity) and enhanced (800+ capacity).

Key Differences Between the Tiers

- **Standard Tier:** Focuses on basic procedures for dealing with suspected or actual attacks—evacuation, lockdown, and communication.
- **Enhanced Tier:** Requires all standard-tier measures plus proactive steps to reduce vulnerabilities (e.g., monitoring, managing ingress/egress, physical security, and protection of sensitive information). These measures require documentation and evidence of implementation.

Regulator's Role (SIA)

- Enhanced-tier venues must submit certain documents at notification.
- The regulator is designing a digital, streamlined system for venues to lodge required materials.
- The SIA is coordinating with other regulators (licensing, fire safety, SGSA) to avoid duplication.
- Only the SIA can determine formal compliance with Martyn's Law.

Inspections

- The SIA will take a **risk-based** approach due to the large number of venues (155k standard, 27k enhanced).
- Inspections may be desk-based (document review) or physical (1–3 days at a venue).
- Inspections will focus not only on paperwork but on **practical implementation**, including speaking with frontline staff.
- Early inspections will function as pilot visits, with lessons learned shared across the sector.

State of Readiness

- Many enhanced venues already undertake substantial security work—Martyn’s Law largely codifies existing good practice.
- A key challenge: defining what is “enough” and what is “reasonably practicable,” especially given long-term planning cycles and resource constraints.

Sector Concerns

- The biggest question: *When will the Home Office publish statutory guidance?* (Expected early 2026).
- Concern about consultants claiming they can guarantee compliance—no one can do this until the official guidance is released.
- Venues should continue to focus on good protective security now, use ProtectUK and NPSA resources, and contribute feedback through industry bodies.

Coordination & Cooperation Duties

- Complexities arise when multiple premises sit near one another. Venues will need plans for cooperation during incidents, such as managing evacuations across boundaries.

International Interest

- Martyn’s Law is seen as globally groundbreaking, with strong interest from US, European, and Australasian security communities. The UK is engaging internationally but remains focused on domestic implementation.

Below are **three tailored versions** — one each for **venue operators**, **security teams**, and **senior leadership**.

Each focus on what matters most to three audience categories based on the discussions with SIA CEO Michelle Russell.

1. Notes for Venue Operators

What Martyn’s Law Means for You

- You will fall under either:
 - **Standard Tier (200+ capacity)** – basic procedures for evacuation, lockdown, communication.
 - **Enhanced Tier (800+ capacity)** – all of the above plus demonstrable measures to reduce vulnerabilities.

Practical Expectations

- Enhanced venues must **submit documentation** to the regulator when notifying.
- Inspections may involve **document review** and **on-site checks**, including conversations with frontline staff.
- The regulator will apply a **risk-based approach**, so not every venue will receive routine physical inspections.

What to Do Now

- Keep doing what you already do to keep people safe—don't wait for legislation to go live.
- Use **ProtectUK**, **NPSA**, and Home Office fact sheets for verified guidance.
- Avoid consultants claiming to guarantee compliance; formal standards aren't published yet.
- Begin thinking about coordination with **adjacent premises**—how would joint evacuations or shared risks be managed?

What's Still Coming

- Statutory guidance from the Home Office (expected **early 2026**).
- Clearer definitions of what counts as “enough” and “reasonably practicable” security measures.

2. Notes for Security Teams

Core Security Obligations

- Standard Tier focuses on **incident response** (evacuation, lockdown, communication).

- Enhanced Tier adds obligations to **actively reduce vulnerabilities**, including:
 - monitoring and surveillance
 - controlling access/egress
 - physical security reinforcement
 - protecting sensitive security information

Inspection Focus

- Expect the regulator to assess **practice, not just paperwork**.
Examples:
 - Staff may be asked about their last training session.
 - Inspectors will test whether procedures are actually understood and enacted.
- Early inspections will operate like “pilots,” with shared lessons learned across the sector.

Immediate Actions for Security Leads

- Review protective security measures already in place—many enhanced venues already meet much of what Martyn’s Law requires.
- Ensure training packages are up to date and staff can **explain** what to do during “if X happens” scenarios.
- Track planning cycles—major security upgrades may take **years**, so prepare interim measures.
- Reinforce internal culture: Martyn’s Law is about **practical safety**, not “tick-box compliance.”

Risks & Misconceptions

- Consultants cannot currently define “compliance”—wait for formal guidance.

- Maintain awareness on ProtectUK, NPSA, and industry briefings.
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3. Notes for Senior Leadership

Strategic Implications of Martyn's Law

- The legislation introduces a major cultural shift: **proactive risk reduction**, not just reactive planning.
- Enhanced venues will be required to provide **documented, defensible evidence** of vulnerability management.
- Compliance will directly impact reputation, operational continuity, and legal exposure.

Regulatory Landscape

- The SIA is the **sole body** authorised to determine compliance.
- They aim to avoid duplication with licensing, fire safety, SGSA, and other regulators—but cross-regulator coordination is still developing.
- Inspections will be **risk-based**, not universal; early findings will inform sector-wide guidance.

Leadership Priorities

- Recognize that many large venues already do much of what will be required—build on existing systems.
- Begin planning resource allocation now:
 - staffing
 - training
 - capital works
 - information security improvements
- Understand that “reasonably practicable” will be interpreted in context of your venue’s size, resources, and planning cycles.

- Encourage teams to prepare for the duty to **cooperate and coordinate** with nearby premises—this has operational and legal implications.

What Leadership Should Monitor

- Home Office statutory guidance (expected **early 2026**).
- Sector-wide lessons learned from early inspections.
- Potential impacts on insurance, liability, and risk registers.
- Reputational risk: Martyn's Law is being closely watched internationally.