



TERRORISM (PROTECTION OF PREMISES) POLICY

The Terrorism (Protection of Premises) Act 2025 was granted Royal Assent on 3 April 2025, but the requirements have not yet been commenced by regulations. This means they are not yet in force and do not need to be complied with until brought into force by secondary legislation, after an implementation period that is expected to be at least 24 months.

Date Ratified:	14 April 2024
Meeting:	Finance and General Purpose Committee
Next review date:	April 2027 (or within 12 months of commencement of relevant duties, whichever is sooner)

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1. Background, Scope and Aim of Policy

The Terrorism (Protection of Premises) Act 2025, commonly referred to as Martyn’s Law, is intended to improve protective security and organisational preparedness across the UK. The Act establishes a tiered framework under which those responsible for certain premises and public events must take proportionate steps to prepare for and reduce the impact of a terrorist attack.

The new Act requires certain premises and qualifying events to ensure steps have been taken to prepare for potential terrorist attacks and to help keep people safe in the event of an attack. In addition, certain larger premises and qualifying events must also consider, and where reasonably practicable implement, public protection measures to reduce vulnerability to acts of terrorism.

This document sets out how land and buildings (premises) owned by, or the responsibility of, Thornbury Town Council will be assessed and managed in line with the Act and any subsequent regulations or statutory guidance. The Council recognises that the legislation establishes a tiered approach linked to the different uses of premises and to the number of individuals it is reasonable to expect may be present at the same time.

Ordinary public playgrounds and informal open spaces are not generally in scope as qualifying premises on a day-to-day basis, as they are typically low-density, unstaffed spaces without ticketing, crowd control, or organised activities, unless their use changes significantly and they fall within a listed use and capacity threshold under the Act.

The aims of this Policy are to:

- Set out how the Council will identify any premises and events that fall within scope of Martyn’s Law.
- Describe how responsibilities will be allocated between the Council and event organisers (duty holders).
- Establish a proportionate framework for risk assessment, planning, training and exercising.
- Ensure that the Council is ready to demonstrate compliance once regulations commence.

2. Definitions and Legal Context

2.1 Town Council

Thornbury Town Council is the owner, leaseholder or controller of specified premises (land and buildings) within the parish and may itself organise, host, licence or facilitate events at those premises. Where the Council holds events, hires out, leases or licences premises, or allows other groups to use the facilities, it must ensure that a suitable “duty holder” (responsible person) prepares adequately for possible terrorist attacks in line with the Act.

2.2 Qualifying Premises

“Qualifying premises” are defined in the Act by reference to listed uses (for example, certain

entertainment, sports, retail, food and drink, and public buildings) and the number of individuals it is reasonable to expect may be present from time to time. The Act and associated information indicate that:

- Standard duty (Standard Tier) premises are those within a capacity band to be specified in regulations but expected to be a capacity of 200-800.
- Enhanced duty (Enhanced Tier) premises are those with a capacity of 800 or more individuals.

2.3 Qualifying Events

“Qualifying events” are public events at which it is reasonable to expect that at least the enhanced duty capacity (currently indicated as 800 or more individuals) may be present and which fall within categories set out in the Act. Qualifying events are treated within the enhanced tier.

2.4 Duty Holder / Responsible Person

The “responsible person” (duty holder) is the person or organisation that has control of the qualifying premises in connection with their use or has control over the qualifying event. For Council-owned premises this will usually be the Town Council when it operates the premises or runs an event itself, or the hirer/organiser where the premises are hired out or licensed and operational control is transferred under an agreement.

2.5 Relevant Duties

The Act imposes different “relevant duties” depending on whether premises or events are in the standard or enhanced tier, which will be further detailed in regulations and statutory guidance. In outline:

- Standard duty premises must notify the regulator, undertake terrorism risk assessments, and implement and maintain “public protection procedures” (for example basic security planning, staff awareness and response arrangements).
- Enhanced duty premises and qualifying events must do all of the above and, so far as reasonably practicable, implement “public protection measures” designed to reduce vulnerability and the risk of physical harm (for example search policies, physical security, crowd management and other mitigations).

2.6 Regulator

The Security Industry Authority (SIA) will act as regulator for Martyn’s Law, including receiving notifications, supporting compliance and taking enforcement action where necessary.

3. Premises and Event Classification

The Council will maintain an inventory of premises and events which may fall within the Act’s scope. Each will be reviewed against capacity, use, and control, using a risk-based assessment matrix (see Section 4).

3.1 Council Premises

a) Land

Mundy Playing Fields

On a day-to-day basis the Mundy Playing Fields have the capacity to hold over 200 people but are of generally low density, with numbers limited by play equipment, sports facilities and open spaces with numerous pedestrian entry and exit points. Vehicular access is limited to one road from Kington Lane leading to a car park with boundary barriers, height restrictions and barrier gate. This routine use is unlikely to fall within scope as a qualifying premises, but the site may form part of a qualifying event or higher-risk activity.

The Chantry (Field)

On a day-to-day basis the field generally attracts casual use – for example people playing sports/games, walking dogs, and children walking to and from school. The field is not routinely hired out for events; however, the field has the capacity to hold over 200 people and, if used for an organised event meeting the criteria and capacity thresholds, could form part of a qualifying event in the enhanced tier.

Other Open Public Spaces

Other open public spaces not actively hired out are typically low-density, informal environments with multiple access points and limited organised activity. These will generally fall outside qualifying premises definitions unless their use changes (for example a large, organised festival or concert).

b) Buildings

Town Hall

Maximum capacity 120. This building may fall within a standard duty threshold if future regulations or guidance specify a minimum capacity of 100 or above and the use is listed (for example public assembly, events, or similar functions). The Town Hall's uses (civic meetings, community events, hire) will therefore be monitored against evolving guidance.

Pavilion Building Complex

The capacity of the pavilion not exceeding 120, with additional Home, Away and Referees' changing rooms adding a further capacity of up to 63. Combined, the complex could accommodate close to 200 people in certain configurations and, depending on use and layout, may fall within the scope of standard duty premises if thresholds and use criteria are met.

c) Combination of Land and Buildings

Pavilion and Pitch Number 1

The combination of pavilion facilities and pitch use (including spectators) may, for certain fixtures or tournaments, reach or exceed standard tier capacity levels. The Council will monitor anticipated attendance and activities to identify when the site may operate as a qualifying premises or form part of a qualifying event.

67 High Street (leased offices and 67a residential flat, car park and “Bakery Annex”)

This is a mixed-use site. Office space and the residential flat will generally fall outside the scope of Martyn’s Law, while any public-facing “Bakery Annex” use (for example as a Museum) may be in scope if capacity thresholds and listed uses are met. The Council will keep the use of this property under review in liaison with tenants.

Chapel and Cemetery

The chapel is intended to be used for services, accessing the cemetery and memorial woodland (in development). It may also be leased out for events and Thornbury based activities.

3.2 Events Summary

Examples of events associated with Council premises include:

Firework Display – Mundy Playing Fields

External organiser, with the site having potential to attract large crowds. Attendance estimates will be required from the organiser to determine whether the event meets qualifying event thresholds.

Thornbury Carnival – Mundy Playing Fields

External organiser, with the site having potential to attract large crowds. Attendance estimates will be required from the organiser to determine whether the event meets qualifying event thresholds.

Football Fixtures and Tournaments – Pavilion and Pitch 1

Organised by a local football club, with a typical maximum attendance of around 400 people. This suggests that some tournaments or special fixtures could fall within a standard tier capacity band (subject to final thresholds and the premises’ listed uses) but are unlikely to reach enhanced tier levels.

The above list is indicative and will be updated as Council activities evolve.

3.3 Assessment Matrix

A risk-based classification will be used to assess whether each location or event falls within Martyn’s Law tiers and what compliance measures are required. The matrix will consider the following factors:

- Legal status: listed use in the Act or guidance, and whether it is a qualifying premises or event.
- Capacity: maximum number reasonably expected to be present at one time, including staff, volunteers and attendees.
- Nature of activity: density of crowds, presence of queues or bottlenecks, indoor vs outdoor environment, presence of alcohol or night-time economy.
- Control and stewardship: staffing levels, security presence, and clarity of roles.
- Physical characteristics: entry/exit points, perimeter, vehicle access, proximity to roads and public transport.

- Existing controls: current emergency and security arrangements already in place.

Each premises or event will be assigned a category:

- Out of scope (no Martyn's Law duty).
- Potential standard duty premises.
- Confirmed standard duty premises.
- Potential enhanced duty premises / qualifying event.
- Confirmed enhanced duty premises / qualifying event.

4. Roles, Responsibilities and Governance

4.1 Corporate Lead

The Town Council's Chief Executive Officer (or nominated senior officer) will act as corporate lead for Martyn's Law compliance on behalf of the Council. They will:

- Maintain the register of potentially qualifying premises and events.
- Oversee risk assessments and the development of public protection procedures and, where applicable, public protection measures.
- Act as the main liaison with the regulator and other agencies, once the regulator's role is fully operational.

4.2 Deputy Clerk and Facilities Officer

Council Officers will:

- Provide accurate information on capacity, layout, activities, and occupancy.
- Ensure local emergency response plans and procedures reflect Martyn's Law requirements proportionately.
- Arrange and record appropriate staff and volunteer awareness training.
- Participate in exercises and debriefs relating to terrorism preparedness.

4.3 Event Organisers and Hirers

Where events are organised by third parties using Council premises:

- The event organiser will usually be the duty holder (responsible person) for the qualifying event.
- Terms and conditions of hire will require organisers to:
 - Confirm anticipated capacity and event layout.
 - Undertake and share a suitable terrorism risk assessment and event management plan, proportionate to the level of risk and tier.
 - Co-operate with the Council and relevant authorities on security matters.
- The Council will retain oversight to ensure that the organiser's plans meet the relevant statutory requirements and that reasonable co-operation is provided.

4.4 Councillors

Councillors will:

- Approve this Policy and any subsequent significant amendments.
- Receive updates and information on the Council's readiness and compliance with Martyn's Law once in force.

5. Risk Assessment and Planning

5.1 Terrorism Risk Assessment

For each premises or event identified as potentially in scope, the Council (or event organiser) will complete a proportionate terrorism risk assessment, which may be integrated into existing health and safety and emergency planning processes. This will:

- Identify realistic attack methods relevant to the site (for example bladed weapons, vehicle as a weapon, firearms, explosives).
- Consider vulnerabilities in crowd management, access control, vehicle access and communication.
- Record existing controls and identify additional proportionate measures.

5.2 Public Protection Procedures (Standard Tier)

For standard duty premises, the Council will, as required by regulations:

- Notify the regulator that it is responsible for qualifying premises.
- Prepare and maintain written public protection procedures covering:
 - How to warn staff, volunteers, contractors and the public if an incident occurs.
 - How to inform people of what is happening and what they should do.
 - How to direct people to safety (for example invacuation, evacuation or lockdown).
- Ensure procedures link with existing emergency plans (for example fire, evacuation, major incident).

5.3 Public Protection Measures (Enhanced Tier)

Where Council premises or events fall in the enhanced tier, additional public protection measures will be identified and implemented, so far as reasonably practicable. These may include:

- Physical measures, such as vehicle mitigation (bollards or barriers), secure gates, reinforced glazing, or CCTV and lighting.
- Operational measures, such as bag search policies, queue management, restricted entry points and closer liaison with police.

- People-based measures, such as dedicated security staff, stewarding plans, and enhanced training.

5.4 Documentation and Records

All risk assessments, public protection procedures/measures, training records, and exercise/debrief reports will be retained in a central repository to:

- Demonstrate compliance to the regulator.
- Support continual improvement of arrangements.

6. Training, Awareness and Exercising

6.1 Staff and Volunteers

The Council will ensure that staff and relevant volunteers working at or around qualifying premises and events receive basic awareness training on terrorism threats and how to respond. This may include:

- Recognising suspicious behaviour and items.
- Understanding national guidance such as “Run, Hide, Tell” and relevant advice from national counter-terrorism resources.
- Knowing site-specific procedures for lockdown, invacuation and evacuation.

Training will be refreshed at intervals proportionate to risk and whenever significant changes are made to premises or procedures.

6.2 Exercises

The Council will incorporate terrorist incident scenarios into existing emergency exercises where appropriate. This may include:

- Table-top exercises with key staff, partners and event organisers.
- Simple walk-through drills covering lock-down, invacuation or evacuation routes.

Lessons identified will be recorded and used to update procedures.

7. Partnership Working and Information Sharing

The Council will work with:

- Avon and Somerset Police (including Counter Terrorism Policing) and other emergency services.
- South Gloucestershire Council and other local authorities.
- Local resilience forums and community safety partners.

The purpose is to:

- Share information about threats, risks and good practice.
- Align local plans with wider multi-agency arrangements.
- Ensure a consistent, proportionate approach to implementation across the area.

8. Monitoring, Review and Implementation

8.1 Pre-Commencement (2025–2027)

Prior to regulations coming into force, the Council will:

- Monitor Government and regulator guidance and factsheets on Martyn’s Law.
- Complete initial mapping and screening of premises and events.
- Prepare draft risk assessments and procedures for those sites judged most likely to fall within scope.
- Build Martyn’s Law considerations into event booking and licensing processes.

8.2 Post-Commencement

Once the relevant duties are commenced by regulations, the Council will:

- Confirm which premises and events are qualifying premises/events and their tier.
- Complete or update risk assessments and plans to ensure compliance within the statutory timescales.
- Notify the regulator where required and respond promptly to any advisory or enforcement correspondence.
- Provide annual assurance reporting to the Full Council.

8.3 Policy Review

This Policy will be reviewed:

- Every 3 years.
- Within 12 months of the commencement of Martyn’s Law requirements relevant to local authorities.
- Whenever there is a significant change to legislation, regulations, premises, or the Council’s event profile.
- Following any incident, near-miss or major learning from exercises.