



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.

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Foreword

The safety of our citizens is the Government's top priority. The current threat picture is complex, evolving, and enduring, and often hard to predict, 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, a terrorist attack. The Bill is one part of the Government's wider counter terrorism strategy – CONTEST.

We are aware through engagement with businesses that counter terrorism security efforts often fall behind other activities already required by law, such as Health and Safety. Our expert security partners assess that individuals are more likely to take action that can reduce harm and save lives, if they have considered what they would do, and how, prior to a terrorist attack occurring.

In 2017, 22 victims lost their lives to the terror attack at the Manchester Arena. Following the attack, the Martyn's Law Campaign Team led by Figen Murray, the mother of one of the victims, Martyn Hett, tirelessly campaigned to introduce Martyn's Law to Parliament. I would like to thank Figen and the team for their enduring efforts.

The Government has consulted extensively with expert security partners, businesses, local authorities, and the Martyn's Law Campaign Team on the proposals. Throughout the development of the legislation, the Government has been conscious of the need for proportionality, balancing the requirements with other pressures facing those who run premises and events in scope.

In 2021, we held an [18-week public consultation](#) which received a total of 2,755 responses, and we attended over 80 stakeholder engagement events to test proposals and encourage stakeholder feedback. Further to this consultation, we held numerous stakeholder group discussions in 2022 to discuss aspects of proposals, and in early 2023 we held five sectoral webinars with specific, impacted groups (Public Sector, Education, Charities, Places of Worship and Industry).

A [draft Bill](#) setting out the Government's proposed approach was published in May 2023. To reach as broad an audience as possible, seven in-person regional roadshows were held across the UK in May 2023. These events were attended by 700 in-person attendees and 1000 individuals online.

To ensure this novel piece of legislation can meaningfully enhance public safety whilst remaining proportionate, we requested the Home Affairs Select Committee (HASC) to 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, we 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 our proposals.

The Government has carefully considered feedback provided as part of [HASC's pre-legislative scrutiny](#) process, as well as the considerable engagement from across the sectors within scope of the proposed Bill. Significant feedback was received on the

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application of the proposals in relation to smaller premises (with capacity of 100 to 799 individuals). Further to this, we have reviewed our approach to the Standard Tier, proposing changes to ensure that requirements are proportionate and clear, whilst ensuring that these achieve their primary objective of this tier: to implement simple procedures which could reduce harm and save lives in the event of an attack. Those responsible for such premises will be required to undertake simple, yet effective, activities to improve protective security and preparedness.

We are launching this 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.

A handwritten signature in black ink, appearing to read 'Tom Tugendhat', written in a cursive style.

Rt Hon Tom Tugendhat MP

Security Minister

Executive summary

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.

Introduction

This paper sets out consultation proposals for Standard Tier requirements within the Terrorism (Protection of Premises) Bill, also known as Martyn's Law. The consultation is aimed at organisations, businesses, local and public authorities, and/or individuals who own or operate publicly accessible premises or events in the UK 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.

An Impact Assessment is attached. This impact assessment estimated the cost of Martyn's Law as of May 2023. Any changes to these estimates since May 2023 have been calculated and the differences highlighted in Annex A.

The proposals

Threat picture

- 1) The UK's Counter Terrorism Strategy, CONTEST, outlines that the terrorist threat is enduring and evolving. We now face a domestic terrorist threat which is less predictable, harder to detect and investigate; a persistent and evolving threat from Islamist terrorist groups overseas; and an operating environment where technology continues to provide both opportunity and risk to our counter-terrorism efforts. We therefore judge that the risk from terrorism is once again rising.
- 2) There have been 14 domestic terror attacks since the start of 2017 in the UK (not including Northern Ireland-related terrorism). Since March 2017, MI5 and the police have disrupted 39 late-stage attacks. Ongoing investigations and disruptions are undertaken in both rural and urban areas.
- 3) The threat to the UK from terrorism is currently SUBSTANTIAL meaning an attack is likely. The nature of the threat means that there is significant potential for attacks which are motivated by a range of factors. Terrorist attackers have targeted a wide range of people and places in recent years. It is not possible to predict where in the UK an attack might happen, or the type of premises or event that could be impacted – either directly (as the target of an attack) or indirectly (by being located near to the target of an attack). To ensure better preparedness and raise the public safety bar, a broad range of premises and events need to be ready to act to reduce harm. Government considers that businesses and organisations which welcome the public have an important role to play by being prepared to act in order to reduce harm should a suspected terrorist attack occur.

Purpose of Bill

- 4) The proposed legislation, also referred to as “Martyn’s Law”, will enhance public safety by ensuring there is better preparedness for, and protection from, terrorist attacks. Martyn’s Law will place requirements on those responsible for certain premises and events to fulfil necessary, but proportionate, steps. The proposal distinguishes between premises according to their capacity and applies different requirements to each of the two resulting “tiers”. These steps are designed to mitigate the impact of a terrorist attack and reduce harm. Through Martyn’s Law, premises will be better prepared and ready to respond in the event of a terrorist attack.
- 5) There will be a significant period prior to the implementation of the legislation following Royal Assent. We expect this period to be at least 18-24 months to ensure sufficient time for those responsible for premises and events in scope to understand their new obligations, and to plan and prepare.

Scope

- 6) The main requirements of the proposed legislation would apply only in relation to certain premises that meet specified conditions.
- 7) The primary qualifying conditions for premises¹ are that:
- a. **Their capacity²** is 100 or more individuals, and
 - b. They are **wholly or mainly used for one or more specified uses**, falling into the following categories:
 - i. Retail, e.g. stores or shopping centres;
 - ii. Hospitality and nightlife, e.g. bars, pubs, restaurants, cafés, nightclubs and other public clubs;
 - iii. Entertainment, e.g. theatres, cinemas, and concert halls and arenas;
 - iv. Sports grounds;
 - v. Recreation and leisure, e.g. public sports/leisure centres, ice rinks and gyms;
 - vi. Public libraries, museums and galleries;
 - vii. Public conference centres, exhibition halls and other venues for hire;
 - viii. Visitor attractions;
 - ix. Hotels, holiday parks and similar holiday accommodation;
 - x. Places of worship;
 - xi. Healthcare;
 - xii. Education and childcare;
 - xiii. Public transport, including train stations, ports and airports; and
 - xiv. Public services and facilities.
- 8) The requirements will not apply to premises that meet the above conditions if either:
- a. They are subject to a specified transport security regime; or
 - b. They comprise a public park, public garden or recreation or sports ground, where no payment is taken for entry nor any check carried out.
- 9) **Premises that meet the above conditions fall into two tiers:**
- a. **The Standard Tier:** Standard Tier premises are those with a capacity of 100-799 individuals, e.g. many retail stores, village halls, bars, restaurants and theatres; and
 - b. **The Enhanced Tier:** Enhanced Tier premises are those with a capacity of 800 or more individuals, e.g. large shopping centres, concert halls and sports stadia. The Enhanced Tier also includes certain events with equivalent capacity.
- 10) It is proposed that places of worship will be Standard Tier premises, irrespective of their maximum capacity, unless they charge a fee for admission. Places of worship are significantly different to other premises within scope, and there are a range of procedures and measures in place, including those funded by Government, to work with and support places of worship to reduce their vulnerability to terrorism and hate crime. As such, it is considered that it is right for them to be generally within the Standard Tier.
- 11) Similarly, it is proposed that premises that are used for childcare or primary, secondary or further education (but not higher education) will also fall within the Standard Tier even if their capacity is 800 or over. Existing safety and safeguarding policies and procedures (which are independently overseen) mean there is a range of measures and procedures in

¹ Premises may comprise (i) a building with accompanying land, including parts of buildings and groups of building or (ii) any other land with a readily identifiable boundary (whether permanent or not).

² Capacity calculations to be based on maximum capacity of the public parts of a premise (including employees where applicable)

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place at these establishments. These include, for example, lockdown and evacuation processes. The operating environments for these establishments are significantly different to the freely accessible nature of higher education premises, which are subject to the requirements of the Bill in accordance with their capacity.

- 12) The requirements for the Enhanced Tier are more significant than those for the Standard Tier, which is the focus of this consultation. This reflects the potentially greater impact of a successful attack at these higher-capacity premises. In short, those responsible for Enhanced Tier premises must have in place such security measures as would, insofar as is reasonably practicable, mitigate the risk of a terrorist attack occurring at the premises and/or the risk of physical harm to individuals at the premises (if an attack occurred there or in the vicinity). Unlike the Standard Tier, the measures are not limited to the response to a terrorist attack and may entail the installation of physical measures where doing so is reasonably practicable.
- 13) In total, it is estimated that 278,880 premises fall into the Standard Tier. These are mostly retail and hospitality (65% of premises), places of worship (16%) and schools (11%). In terms of the operation of these premises, 153,590 are operated by micro businesses/organisations (55.1%), 37,450 are operated by small businesses/organisations (13.4%), 28,600 are operated by medium businesses (10.3%), and 59,240 are operated by large businesses/organisations (21.2%).
- 14) The Standard Tier incorporates premises which have a variety of purposes, ranging from shops, community facilities or village halls to cinemas, nightclubs or theatres which may have capacity for up to 799 individuals. Those who operate these premises will have differing skills, experiences and knowledge as to how best to respond to emergencies. The Standard Tier procedures have been developed to recognise a diversity of premises and their occupants, delivering meaningful outcomes across this broad range of premises where lives could be saved in the event of an attack.

Revised approach to Standard Tier

- 15) During pre-legislative scrutiny conducted by HASC, some concerns were raised as to the burden associated with the Standard Tier, with particular focus on voluntary and community-run premises within scope of the published draft Bill.
- 16) Since publication of the draft Bill in May 2023, the Government has revised its approach to the Standard Tier. The revised obligations are designed to be low-to-no financial cost and low burden to put in place, whilst continuing to deliver meaningful outcomes that could save lives. The Government is committed to ensuring that those responsible for complying with Standard Tier requirements premises are not over-burdened. HMG believes the proposed changes to the Standard Tier mean that the duty can apply to premises in a proportionate way, without incurring significant additional cost or time. We are seeking specific feedback in this consultation to ensure the proposed requirements strike the right balance.
- 17) The purpose of this consultation is to test Government's proposals for the Standard Tier. We wish to understand the views of organisations and the general public as to whether our revised approach:

- Sets out the Government's requirements for the Standard Tier in a clear, understandable way; and
- Is better suited to the wide variety of organisations within the Standard Tier, to ensure that any burden is appropriate.

Overview of Revised Standard Tier requirements

18) In summary, those responsible for Standard Tier premises³ must:

- **Notify the Regulator that they are, or have become, responsible for premises within scope of the Bill (and so subject to the relevant requirements).** This remains broadly in line with previous 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.** These relate only to the procedures to be followed by people working at the premises in the event of an attack occurring or being suspected as about to occur. Details on the procedures required are set out at paragraph 22. As the procedural measures are about procedures for responding to an attack or suspected attack, it is not expected or required that physical alterations be undertaken or additional equipment purchased for Standard Tier premises.
- In contrast to the published draft Bill, there is **no requirement to complete a specified form (the 'Standard Terrorism Evaluation') for Standard Tier premises or ensure that people working at the premises are given any specific training.** However, as part of putting in place the procedural measures, workers will need to be sufficiently instructed or trained to carry them out effectively.

Detailed Standard Tier requirements

19) This section sets out more detail on the key elements of the Standard Tier.

Policy Intent - Procedural measures

20) The procedures at particular premises may vary in line with the activities they undertake, the operating environment, and the systems, equipment and resources available at the premises. At venues for hire, the person responsible for the venue might include procedures in their contracts for hire and ensure relevant information is displayed appropriately, including – for example - on posters. This is similar to how such organisations meet their

³ A person – whether an individual or an organisation (e.g. a company) – will be responsible for premises, and so for complying with the requirements proposed in relation to them, where they have control over the premises.

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obligations under Fire Safety. Comparatively, a medium sized theatre (e.g. 750 person capacity) may determine that existing security and front of house staff need increased awareness to ensure procedures are followed.

- 21) Whilst well-received as a concept, it became apparent through pre-legislative scrutiny that the previous approach, which focused on the completion of a specified form, the Standard Terrorism Evaluation, was too directive and inflexible for the broad range of sectors and premises in scope. In addition, when considering the requirement to provide relevant workers with prescribed terrorism protection training, it became clear that this also was too directive and inflexible, particularly when considering its application to smaller locations, and charitable and voluntary premises.
- 22) Having considered these issues, the Government's revised proposal is a requirement for those responsible for Standard Tier premises to have in place such procedures that may be expected, so far as reasonably practicable, to reduce harm to the public and staff at the premises in the event of a terrorist attack. This will include procedures for:
- Evacuation – how to get people out of the building,
 - Invacuation - how to bring people into the premises to keep them safe, or move them to safe parts of the building,
 - Lockdown - how to secure the premises against attackers, e.g. locking doors, closing shutters and using barriers to prevent access, and
 - Communication - how to alert staff and customers and move people away from danger.
- 23) This moves away from the focus being on the completion of a form, to concentrating efforts on outcomes and the development of effective plans and procedures. These plans and procedures should be tailored to the particular premises (how they operate, their resources and the types of acts of terrorism that could occur there).
- 24) Having these procedures in place also means ensuring that they are appropriately communicated to staff and maintaining their awareness of them, e.g. through training and in some cases practice runs, so that they can be effectively implemented in the event of an attack. Guidance will include information on procedures that can be adapted to specific premises.
- 25) Those responsible for Standard Tier premises need not do anything that is outside their control, or that would impose disproportionate burden on their finances or resources. This balancing exercise between the reduction of risk of harm to staff and visitors and the costs of implementation is familiar from other regulatory regimes such as Health and Safety, which require the taking of reasonably practicable steps.

Guidance

- 26) Guidance will help those subject to the requirements develop effective procedures that are suitably tailored to their circumstances and resources. It will guide them in developing and implementing policies, procedures and plans that are reasonably practicable for their organisation; for example, reasonably practicable procedures might look different at a theatre compared to a community hall.

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- 27) Guidance will be available on ProtectUK and will support users in further understanding the types of terrorist attacks that could occur at their premises.
- 28) Guidance will also include optional templates, building upon the previously published Standard Terrorism Evaluation. The templates will guide organisations through a step-by-step process to consider CT procedures for their premises.

Training

- 29) Under the published draft Bill, those responsible for all premises in scope were required to ensure certain individuals completed specific types of training at definitive milestones (e.g. prior to commencing work at the premises or as soon as possible after). Workers identified as those with relevant responsibilities were required to have training to understand the types of terrorist acts most likely to occur, the indicators that an attack might be taking place, and the procedures to follow (“terrorism protection training”).
- 30) Having listened to concerns from our stakeholders, we understand that a prescriptive requirement for all relevant workers to complete such a training product is not appropriate for the broad types of premises and sectors in scope.
- 31) As set out above at paragraph 18, the Government’s revised approach will require those responsible for Standard Tier premises to put in place procedures to be followed, should a terrorist attack occur or be suspected. As part of putting in place such procedures, those responsible must ensure that all procedures are sufficiently communicated to staff so that they know what to do in the event of an attack. What sort of training or instruction in those procedures is reasonably practicable will depend on the nature of the premises, its staffing and circumstances. For example, certain staff, such as duty managers or those working front-of-house at a theatre, should have a greater awareness whilst general staff may only be notified of protocols relevant to their area or responsibilities.
- 32) Accordingly, the published requirement for terrorism protection training is no longer part of the proposed legislation. The focus is on ensuring that those working at the premises are aware of the actions to take in the event of a suspected attack. The Government considers this revised approach ensures greater clarity by ensuring that training should support the delivery of effective procedures, and takes account of particular organisational capabilities and needs, e.g. staffing.

Compliance for Standard Tier

- 33) The Government’s clear expectation is that the Regulator’s first obligation will be to support those responsible for premises in complying with their obligations. We will set clear parameters and expectations that the Regulator should provide such support through advice and guidance – with the Regulator acting as an educator in the first instance. The Regulator should, wherever possible, support those responsible for premises to put in place procedures to reduce harm to their staff and customers should an attack occur.

- 34) Reflecting the importance of proportionality, the proposed sanctions regime has been designed such that differing levels of sanctions apply to the Standard and Enhanced Tiers. It is assumed, based on learning from other regulatory regimes, that instances of non-compliance will be rare, and that compliance will be achieved following engagement with the Regulator and largely without the need for enforcement action.
- 35) However, such engagement can fail and non-compliance may persist. Where a person does not comply with the proposed requirements, the Regulator will be able to issue compliance notices and monetary penalties in relation to Standard Tier premises.⁴ Prior to issuing a notice or monetary penalty, the Regulator will provide an opportunity to make representations and demonstrate compliance. There will be no criminal offence for failing to comply with a compliance notice in the Standard Tier.
- 36) It is expected that more often than not a monetary penalty will be issued only after a compliance notice has been issued and not complied with. The amount of the penalty must not exceed £10,000 for the original, fixed penalty. There is the possibility of further daily penalties of up to £500, if non-compliance continues. This maximum amount ensures an appropriate penalty can be issued for the range of premises within the Standard Tier, from premises that are small in size or run by smaller organisations (such as community halls) to larger premises and those run by larger organisations (chain supermarkets, chain restaurants, 799 seater theatres).
- 37) The amount of the penalty must be reasonable and proportionate to the non-compliance with which it is concerned. The Regulator must take into account the effects of the failure, any mitigating action taken to remedy it or its effects, and the recipient's ability to pay. This ensures that it will not be overly punitive or impactful on the organisation's ability to continue operating, which is of particular concern for smaller businesses and organisations within the VCSE sector.
- 38) Further detail on how the Regulator will operate is being developed in collaboration with other regulators and industry partners in readiness for the Regulator being established.
- 39) **In summary, the revised requirements for the Standard Tier are:**
- **To notify the Regulator that they are, or have become, responsible for premises within scope of proposed legislation and so subject to the relevant requirements therein.** This remains broadly in line with previous requirements, and
 - **To 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.** These relate only to the procedures to be followed by people working at the premises in the event of an attack occurring or be suspected as about to occur.

⁴ Unlike the Enhanced Tier, the Regulator will not be able to issue restriction notices in relation to standard duty premises. A Restriction Notice can only be issued by the Regulator where it is necessary to restrict activity at premises or events in order to protect the public. Restrictions can range from limiting times at which they may operate or the number of individuals permitted (at any time) to enter the premises or event, and in particularly serious cases, to prevent an event from taking place or prohibit premises operating in a certain way.

- In contrast to the published draft Bill, there is **no requirement to ensure that people working at the premises are given any specific training**, but it forms part of putting in place the procedural measures that workers are sufficiently instructed or trained to carry them out effectively.

How does this approach differ from the published Bill?

- 40) We have **removed the requirement for specific terrorism protection training**. This required certain individuals to complete training that was not limited to the carrying out of procedures in the event of an attack. Now, those responsible for Standard Tier premises must ensure that sufficient training is provided for their procedural measures to be put in place effectively. Information on appropriate training will be included in guidance.
- 41) We have **removed the requirement to complete the Standard Terrorism Evaluation**. Instead, the requirement is simpler and more meaningful in requiring that reasonably practicable procedures to follow in the event of an attack are in place at Standard Tier premises. A template will remain available as part of guidance on the proposed requirements, guiding users through their consideration of the appropriate procedures for their premises.

Impact Assessment

- 42) The Government has published an Impact Assessment into Martyn's Law detailing the costs, benefits and effects of the policy. The Impact Assessment can be found online [here](#)⁵. This includes an assessment of the Net Present Social Value (NPSV) and the estimated yearly cost to business. Since the Impact Assessment has been published, revisions to the IA have been made to reflect policy changes since May 2023, improve accuracy and respond to comments from the RPC. The full list of changes is summarised in the Annex. A summary of the current assessment of the impact of the policy can be found below.
- 43) To apply proportionate duties whilst considering any impacts to business, the primary duty for Standard Tier premises has been amended from a requirement to complete a standardised template to having procedures in place, were an attack to occur and making sure staff are aware of these procedures. The Reasonably Practicable test allows for businesses to determine what is proportionate to their organisation, including what is financially feasible.
- 44) The Net Present Social Value of Martyn's Law is estimated to be between -£726 million⁶ and -£5.52 billion with a central estimate of -£2.15 billion⁷. The majority of the cost is concentrated on the cost to business which is estimated to be between -£731 million and -£5.47 billion with a central estimate of -£2.12 billion (PV). The estimated yearly cost to business is between £85 million and £635 million with a central estimate of £246 million per year.

⁵ Terrorism (Protection of Premises) Bill: Impact assessment (publishing.service.gov.uk)

⁶ All the values in the note are in 2022 prices and have a base year of 2024, with values being expressed in present value (PV) terms.

⁷ Ranges between a high and low estimate with a central value have been used to show the uncertainty in the costs and benefits of the proposals (and are used alongside the central value).

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- 45) The Standard Tier has an estimated total cost of between £387 million and £1.63 billion with a central estimate of £860 million (PV) over the full appraisal period. This is an economic cost from working hours being taken up to complete CT planning, put in place procedural measures and communicate them to relevant workers, 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.
- 46) A more detailed overview of the Impact Assessment can be found at Annex A below.

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

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

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

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 → 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.

it seems imperative that the introduction of this legislation and its application to small and medium sized businesses must be accompanied by clear guidance. This could be achieved through the production of associated codes of best practice. These codes might provide clear guidance to assist premises operators comply with the legislation without having to seek external expertise

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.

- 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.

The introduction of legislation for premises owners to specifically consider risks from Terrorism will place a legislative burden on standard Tier premises comparable to considerations arising from Fire Safety and Health and Safety. Whilst Fire safety and Health and Safety risks may be known to the owner of such premises and as such reasonably foreseeable the risks to premises from Terrorism related incidents are not as reasonably foreseeable.

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.

Premises owners have a general duty to ensure all persons in their premises are so far as is reasonably practicable not exposed to risk whilst on their premises. If volunteers were present in a premises in a work capacity it is critical that through a risk assessment process relevant training on the risks to which they are exposed whilst present in the premises are considered and if necessary suitable and sufficient training, instruction and supervision provided to these volunteers.

99 Don't know



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

Contact details and how to respond

Please send your response by 18 March 2024 via the URL above.

Complaints or comments

If you have any complaints or comments about the consultation process you should contact the Home Office at the below address.

Extra copies

Alternative format versions of this publication can be requested from 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.

Publication of response

A paper summarising the responses to this consultation will be published once the Bill is introduced to Parliament. The response paper will be available online at GOV.UK .

Representative groups

Representative groups are asked to give a summary of the people and organisations they represent when they respond.

Confidentiality

This research is being conducted by Verian, on behalf of the UK Home Office, to understand views towards the proposed Standard Tier requirements. Completion of the survey should take around ten minutes but is dependent on the level of detail you wish to provide. Verian's privacy policy can be found here: <https://www.veriangroup.com/uk-surveys>

Terrorism (Protection of Premises) Bill - Standard Tier Consultation

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, 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.

Annex A - Impact Assessment

Changes to the Martyn's Law Impact Assessment Since Pre-Legislative Scrutiny

1. The Home Office previously published an impact assessment (IA) for Martyn's Law in May alongside a draft of the bill.
2. Since then, Martyn's Law has changed in certain areas and this annex summarises the changes and reasoning behind the changes.

Headline Changes

3. Overall, the IA has become cheaper and slightly less burdensome on business due to changes in the contents of the bill as well as improvements to the evidence base on Martyn's Law. A summary of these changes can be found in the table below. All figures in this document are in 2022 Prices and 2024 Present Value.

Part of the IA	Estimate Value	Previous Estimate	Current Estimate	Change
Net Present Social Value (£ million)	Central:	-£2,725.3	-£2147.3	-£578.0
	High:	-£6,329.0	-£5522.6	-£806.4
	Low:	-£1,083.7	-£726.3	-£357.4
Estimated Yearly Cost to Business (£ million)	Central:	£303.7	£246.2	-£57.5
	High:	£715.5	£635.0	-£80.5
	Low:	£119.8	£85.0	-£34.8
Total Cost (£ million)	Central:	£2,743.8	£2165.8	-£578.0
	High:	£6,336.6	£5530.2	-£806.4
	Low:	£1,120.6	£763.2	-£357.4
Total Benefit (£ million)	Central:	£18.4	£18.4	£0.0
	High:	£36.9	£7.6	£0.0
	Low:	£7.6	£36.9	£0.0
Annual Cost to a Standard Tier Premise (£)	Central:	£216	£309	+£93
	High:	£354	£526	+£172
	Low:	£119	£161	+£42
Annual Cost to an Enhanced Tier Premise (£)	Central:	£8,232	£5139	-£3093
	High:	£16,219	£12286	-£3933
	Low:	£4,128	£1886	-£2242

Individual Changes

Standard Tier

4. In the Standard Tier, the cost has increased due to the addition of clauses relating to the Counter Terrorism Planning element of the tier and increased accuracy. In light of the requirement to make sure staff are aware of the procedural measures, the cost of an additional 15 minutes in the first year and 7.5 minutes for each subsequent year, for staff to make themselves aware of the procedures has been added. The addition of a reasonably practicable test means that this cost estimate will likely be an upper estimate as sites may decide some of the requirements are not reasonably practicable to implement, and therefore face lower costs.

5. This has raised the cost of the tier by roughly £250 million over the ten year appraisal period, with the central estimate for the cost of this tier increasing from £602.5 million to £860.4 million (central estimate).

Enhanced tier

6. In the Enhanced Tier, the cost has decreased due to more evidence on the time taken to complete the risk assessment as well as changes to the training requirements.

7. The risk assessment time has changed due to greater evidence surrounding the possible time taken to complete a risk assessment. This means the estimated time per site has decreased from 367.5 hours to 30 hours. This is based on looking at literature about the burden which Health and Safety risk assessments place on firms and the average time taken to complete these documents.

8. The training requirement for staff in the enhanced tier has remained stable with 10% of staff being trained but staff are estimated to undertake training for three hours rather than the previous one hour.

9. Overall, the effect of both changes has led to the estimated cost of the enhanced tier decreasing from £1,997.8 million to £1,247.2 million (central estimate), a decrease of roughly £750 million.

Regulator

10. The cost of the Regulator changed due to revisions around the possible costs of delivery. This has decreased the estimated cost from £130.4 million to £57.7 million (central estimate).

Benefits

11. The monetised benefits remain the same, but the non-monetised benefits section now includes reference to newly published cost estimates. This includes the estimated cost of all the 2017 attacks, estimated to be £181.1 million. Additionally, the indirect cost of the 2017 attacks has been estimated by RAND Europe to cost an estimated £3.5 billion. Martyn's Law would apply to two of the five locations attacked in 2017, Manchester Arena (22 deaths) and London Bridge/Borough Market (8 deaths).

Consultation principles

The principles that government departments and other public bodies should adopt for engaging stakeholders when developing policy and legislation are set out in the consultation principles.

<https://www.gov.uk/government/publications/consultation-principles-guidance>



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This publication is available at <https://www.gov.uk/government/consultations/martyns-law-standard-tier-consultation>

Any enquiries regarding this publication should be sent to us at MartynsLaw@homeoffice.gov.uk