

Martyn's Law: What Churches Need to Know

Guidance for United Reformed Church Congregations, Elders, Trustees and Church Officers

1. Background

The Terrorism (Protection of Premises) Act 2025, commonly known as Martyn's Law, received Royal Assent on 3 April 2025. The legislation is named in memory of Martyn Hett, who was killed in the Manchester Arena terrorist attack in 2017. The Act aims to improve public safety by requiring certain publicly accessible premises and events to be better prepared for a terrorist attack.

The law introduces a legal requirement for those responsible for qualifying premises and events to consider how they would respond to a terrorist incident and, for larger venues and event, to implement additional protective measures.

Many churches already undertake emergency planning through health and safety processes, fire evacuation arrangements and safeguarding procedures. Martyn's Law builds on these existing responsibilities by requiring churches within scope to consider the risks associated with terrorism and their preparedness to respond.

Quick Tip

Martyn's Law is primarily about preparedness, not creating fortress-like buildings. For most churches within scope, the focus will be on procedures, training and planning rather than expensive physical security measures.

2. What This Means for Churches in Scope

Martyn's Law does not apply to every church. It only applies to premises and events that meet certain criteria set out in the legislation. When a premises or event meets those criteria, it is said to be "in scope" of the Act.

What Does "In Scope" Mean?

A church is likely to be in scope if all of the following criteria are met:

- It is a publicly accessible place of worship.
- It is reasonable to expect that 200 or more individuals could be present at the same time.
- It is used for activities covered by the Act.

Churches that meet these criteria will be required to comply with the relevant duties under Martyn's Law when the legislation comes into force in April 2027. Churches that do not meet these criteria will not have legal obligation under the Act, although they may still wish to consider proportionate security and emergency planning arrangements.

Requirements for Churches in Scope

If your church falls within scope of the legislation, the responsible person must:

1. Notify the regulator, the Security Industry Authority (SIA).
2. Put in place appropriate public protection procedures.
3. Ensure those procedures are understood by relevant staff and volunteers.
4. Review those arrangements periodically to ensure they remain suitable.

Public Protection Procedures

The Act requires consideration of four key areas:

Evacuation

The safe and orderly evacuation of individuals from premises

Invacuation

Moving people to a safer location within the premises, where the threat is outside the building.

Lockdown

Restricting movement into or out of a building to reduce the risk of harm

Communication

Providing clear and timely information to those on the premises before, during and after an incident.

For most churches, these requirements can be addressed through straightforward planning, clear procedures, volunteer awareness and periodic reviews. The Government has made clear that compliance should be proportionate and that the legislation is not intended to impose unnecessary or costly burdens on organisations.

Quick Tip

Start by reviewing what you already have. Existing fire evacuation plans, emergency procedures, stewarding arrangements and communication systems may already address some of the requirements under Martyn's Law.

Who is the Responsible Person?

The Act places duties on the person or organisation that has control of the premises in connection with its use. In many churches, responsibility is unlikely to rest solely with the minister. Depending on local governance arrangements, responsibility may sit with Elders, trustees, managing trustees, a church management committee, or another body that controls the premises and activities taking place there.

Churches should consider who would be responsible for assessing whether the premises fall within scope, implementing any required procedures and maintaining appropriate records.

Quick Tip

Before assessing whether your church is in scope, identify who would be responsible for carrying out the assessment and maintaining any procedures required under Martyn's Law.

3. Is Your Church in Scope? Understanding the 200-Person Threshold

One of the key factors in determining whether a church falls within scope of Martyn's Law is the number of individuals who may reasonably be expected to be present at the premises at the same time. This assessment will help churches establish whether they have legal duties under the Act.

The assessment is based on the highest reasonably expected attendance, rather than average attendance figures. Churches should consider all activities held on their premises throughout the year, including special services, festivals, concerts, community events, conferences, fairs, and other occasions that may attract larger numbers of people.

For example, a church that typically welcomes fewer than 200 people for regular worship may still fall within scope if it is reasonable to expect that 200 or more individuals could be present at the same

time during events such as Christmas services, Easter celebrations, remembrance services, concerts, community events, or summer fairs. The assessment is therefore based on whether attendance of 200 or more people can reasonably be expected at any time, rather than how often such attendance occurs.

This means that churches should consider their maximum anticipated occupancy across all relevant activities when determining whether the requirements of the Act apply.

Questions to Ask

Consider:

- Does your church regularly host services attended by 200 or more people?
- Does your church building host concerts, conferences, festivals, fairs or community events that attract 200 or more attendees?
- Are there occasions such as Christmas, Easter, weddings, funerals or anniversaries where attendance exceeds 200 people?
- Does the total attendance, including volunteers and staff, exceed 200 people?

What Counts as “Reasonably Expected”?

The law is concerned with realistic attendance levels, not theoretical maximum capacity. Churches should base their assessment on evidence such as:

- Fire risk assessment occupancy figures.
- Historical attendance records.
- Ticket sales.
- Normal event attendance patterns.
- Building occupancy limits

Thresholds

Number of Individuals Present	Status
Fewer than 200	Not in scope
200-799	Standard Tier
800+	Enhanced Tier

Places of worship are treated differently under the Act. Where a place of worship is a qualifying premises, it remains within the Standard Tier, even if more than 800 people may attend.

Where church premises are regularly hired by community groups, churches should also consider how those activities contribute to the overall use of the premises. Activities such as concerts, community events, conferences and public meetings may affect the assessment where large numbers of people are expected to attend.

Churches should ensure that booking records, attendance information and premises capacity figures are retained so that any assessment can be supported by evidence if required.

Quick Tip

Do not simply use your usual Sunday attendance. Consider your busiest periods throughout the year when determining whether you may reach the threshold.

4. Good Practice for Churches Below the Legislative Threshold

Whilst the requirements of Martyn’s Law apply to qualifying premises and events that meet the relevant attendance threshold, local churches with occupancies or events below these thresholds are

strongly encouraged to adopt the principles of this guidance as a matter of good practice.

5. Timing & Current Status

Martyn's Law is not yet in force

The Government has indicated an implementation period of at least 24 months from Royal Assent (3 April 2025), meaning implementation is expected no earlier than April 2027.

The implementation period allows:

- The regulator to become fully operational.
- Organisations to assess whether they are in scope.
- Premises and event organisers to prepare for compliance.

Although compliance is not yet mandatory, churches should begin preparing now.

Quick Tip

The churches that start planning early are likely to find compliance straightforward when the law comes into force.

6. What You Should Do Now

Churches do not need to wait until April 2027 to begin preparing

Step 1: Assess Whether You Are Likely to Be in Scope

Review:

- Building occupancy
- Typical attendance
- Special events
- Seasonal services

Step 2: Identify who the Responsible Person or Responsible Body is

This will usually be the Elders or those responsible for controlling the premises. The exact position should be reviewed once final regulatory guidance is available.

Step 3: Identify all activities taking place on church premises

Step 4: Review Existing Emergency Procedures

Consider:

- Fire evacuation plans
- Emergency contacts
- Stewarding arrangements
- First aid provision
- Incident communication methods

Step 5: Provide Awareness Training

Ensure key church officers, ministers, elders, stewards and volunteers understand:

- Basic terrorism awareness
- Suspicious behavior reporting
- Emergency response procedures

Step 6: Use Free Government Resources

The Government and Counter Terrorism Policing provide a range of free training and guidance through ProtectUK (www.protectuk.police.uk/learning).

Step 7: Record discussions and decisions within trustee or church meeting minutes

Step 8: Keep developments under review as further implementation guidance is issued

Churches should view Martyn's Law as part of their wider approach to safeguarding people and managing risk. Existing fire safety procedures, emergency plans, first aid arrangements and health and safety processes may already provide a useful foundation for compliance.

Quick Tip

You do not need to hire consultants to start preparing. Government guidance specifically notes that many organisations will be able to comply using freely available resources

Security Awareness

Creating a positive security culture does not mean creating an unwelcoming environment. Churches should encourage volunteers, stewards and leaders to remain alert to unusual or suspicious behaviour and to know how concerns can be reported.

Free awareness training is available through ProtectUK and the Action Counters Terrorism (ACT) programme.

7. What About Large Events or Separate Premises?

Some churches that would not normally be in scope may occasionally host larger events that attract significant number of people.

Examples might include:

- General Assembly gatherings
- Synod Event and Meeting
- Festivals and conferences
- Christmas and Easter celebrations
- Community festivals
- Music events and concerts

Where an event is organised separately and meets the criteria set out in the legislation, it may need to be considered independently from the church's usual activities. Qualifying events attracting 800 or more attendees with controlled public access are automatically within the Enhanced Tier.

Churches and Events operating multiple or non-church sites should assess each premises individually, as different buildings may fall within different categories depending on their use and occupancy. Churches should work with other venues in these instances.

Quick Tip

If your church hires out its premises, responsibility may depend on who has control of the premises and the event at the relevant time. Consider this when drafting hire agreements and event procedures.

Premises Hire and Community Use

Many churches hire their premises to community groups, charities, uniformed organisations, music groups, nurseries and other users.

Where premises are hired out, churches should clearly understand:

- Who has control of the event.
- Who is responsible for stewarding and safety arrangements.
- How emergency procedures will be communicated.
- Who will contact emergency services if required.
- Whether any activities are likely to attract particularly large numbers of attendees.

Churches may wish to review booking forms, hire agreements and event planning procedures to ensure responsibilities are clearly understood.

Quick Tip

Use booking forms and hire agreements to clarify responsibilities before an event takes place, rather than trying to resolve issues on the day.

8. Regulator, Notification & Enforcement

The Security Industry Authority (SIA) has been designated as the regulator for Martyn's Law.

Once the legislation is fully commenced, responsible persons for qualifying premises and events will be required to notify the SIA of their responsibility for those premises or events.

The legislation provides the regulator with powers to:

- Request information
- Investigate compliance
- Issue compliance notices
- Issue restriction notices
- Impose financial penalties where requirements are not met

The intention of the Act is to encourage preparedness and compliance rather than create unnecessary burdens. Government guidance makes clear that organisations do not need to purchase expensive consultancy services in order to comply.

For many churches, compliance is likely to focus on planning, procedures, awareness and communication rather than expensive security equipment.

Quick Tip

Be cautious of organisations offering paid "Martyn's Law certification" or consultancy packages. Government guidance states that organisations should be able to comply without purchasing specialist compliance services.

9. Practical Checklist for Churches

Governance

- ☐ Discuss Martyn's Law at a Church Meeting, Elder's Meeting or trustee meeting.
- ☐ Identify the responsible person.
- ☐ Record whether the church is likely to fall within scope.

- ☐ Review attendance figures and building capacity.
- ☐ Keep evidence of how the assessment was reached.
- ☐ Record the rationale for any assessment.

Quick Tip

Keep a copy of attendance records, building capacity information and meeting minutes together in case your assessment needs to be revisited later.

Emergency Planning

- ☐ Review evacuation procedures.
- ☐ Review lockdown procedures.
- ☐ Review invacuation procedures.
- ☐ Identify how emergency information would be communicated to those on site.
- ☐ Consider how emergency services would be contacted and supported.

Quick Tip

A simple one-page emergency action plan that key leaders understand is often more useful than a lengthy document that is rarely read.

People

- ☐ Identify who would take the lead during an incident.
- ☐ Ensure stewards, elders and key volunteers understand emergency procedures.
- ☐ Ensure regular hirers understand emergency arrangements.
- ☐ Consider appropriate awareness training.
- ☐ Encourage staff and volunteers to report concerns or suspicious behaviour.
- ☐ Review arrangements for welcoming visitors and responding to concerns.

Quick Tip

Include short security awareness reminders in steward briefings and volunteer training sessions throughout the year than relying solely on annual training.

Premises

- ☐ Ensure exits are clearly identified and accessible.
- ☐ Review access control arrangements.
- ☐ Identify suitable place of safety.
- ☐ Review any physical security arrangements already in place.
- ☐ Ensure signage and emergency information are up to date

Quick Tip

Good housekeeping is often one of the simplest and most effective security measures. Keep exits, corridors and assembly points clear and east to access.

Events

- ☐ Assess larger events separately where appropriate.
- ☐ Consider attendance projections for seasonal services and special events.
- ☐ Document arrangements for managing larger gatherings.
- ☐ Review stewarding and communication arrangements for major events.
- ☐ Review hire agreements and booking procedures.
- ☐ Clarify responsibilities for externally organised events.

Quick Tip

Consider attendance numbers early in the planning process. Waiting until the week before a major event may leave insufficient time to make any necessary changes.

10. Common Misunderstandings

Myths: Every church will be in scope.

Fact: Many churches will fall below the attendance threshold and may not be subject to the legal requirements.

Myth: Churches will need to employ security guards.

Fact: The legislation takes a proportionate approach. For many churches, compliance is likely to focus on procedures, awareness and emergency planning.

Myth: Compliance is required immediately.

Fact: The Act has received Royal Assent, but the substantive requirements are not yet in force.

Myth: Churches must buy consultancy services to comply.

Fact: Government guidance states that organisations should be able to comply without purchasing specialist compliance services.

Myth; Martyn's Law is separate from safeguarding and health and safety.

Fact: Martyn's Law should be considered alongside existing arrangements for safeguarding, fire safety, emergency planning and health and safety.

Quick Tip

If your church already has strong health and safety, safeguarding and emergency arrangements, you may already have many of the building blocks needed to support compliance.

11. Key Official Resources

GOV.UK

Terrorism (Protection of Premises) Act 2025: Statutory Guidance

<https://www.gov.uk/government/publications/the-terrorism-protection-of-premises-act-2025>

ProtectUK

Martyn's Law Guidance Hub

<https://www.protectuk.police.uk/martyns-law>

ACR Awareness Training

Action Counters Terrorism (ACT) e-learning

Free online training and awareness resources available through ProtectUK.

National Protective Security Authority (NPSA)

Protective security guidance, threat awareness resources and security planning tools.

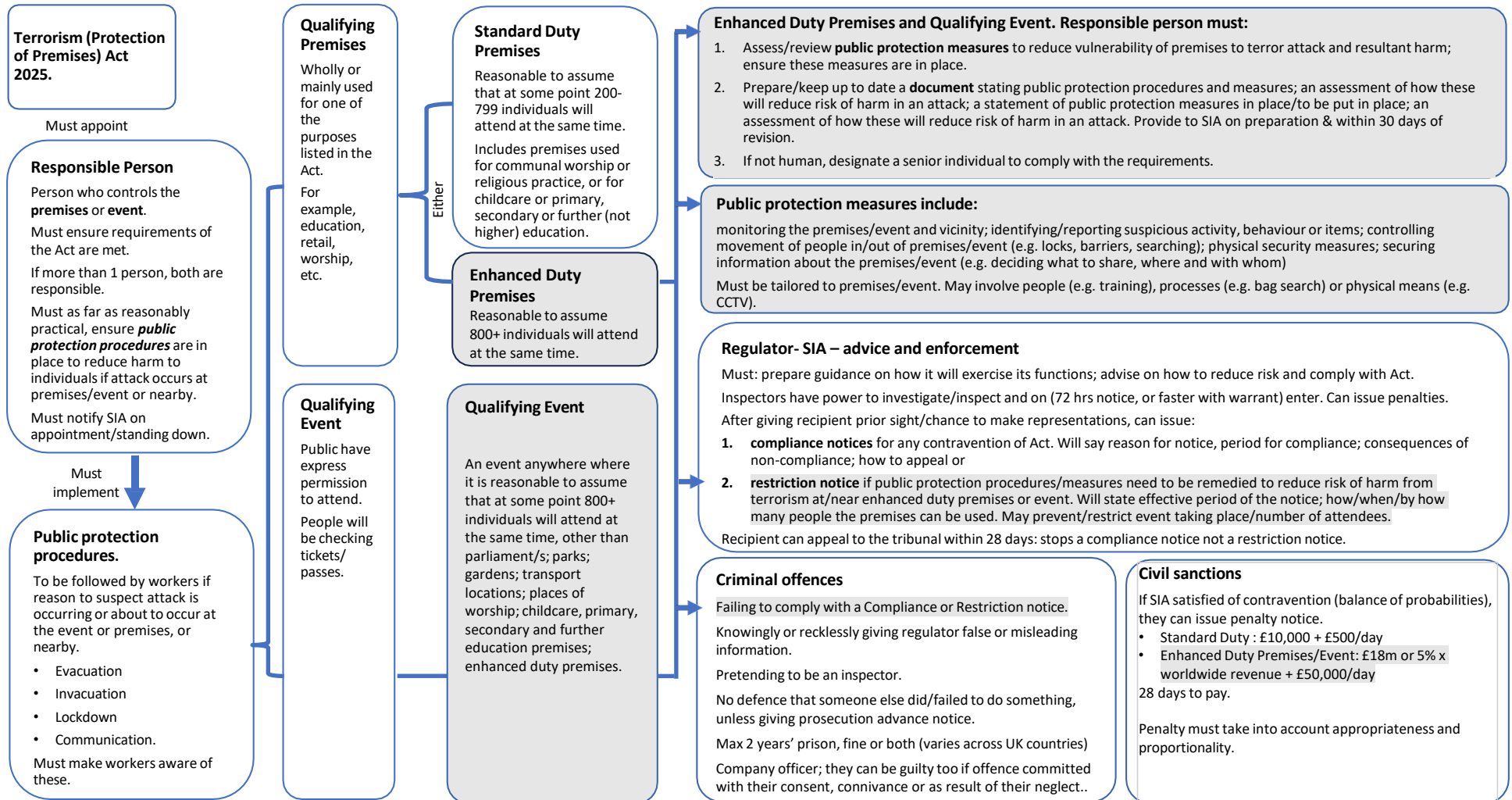
12. Trustee/Elders Action Summary

Church trustees/Elders should:

1. Determine whether their premises or activities may fall within scope.
2. Identify who is responsible for compliance.
3. Record and retain their assessment.
4. Review emergency and security procedures.
5. Consider premises hire arrangements and larger events.
6. Ensure key volunteers understand their role during an emergency.
7. Monitor future guidance and implementation timelines.

The United Reformed Church (the URC) encourages all churches, whether or not they fall within the legal scope of Martyn's Law, to adopt proportionate measures that help keep worshippers, visitors, volunteers and community users safe. Good emergency planning supports responsible stewardship of church buildings and complements the URC's wider commitment to safeguarding and public wellbeing.

13. Martyn's Law Infographic



Based on CST's understanding as at April 2025. Provided without liability. © CST.

14. Martyn's Law: Does It Apply to Your Church?

START	
↓	
Decision: Is the premises a place of worship that is open to the public?	
NO Out of scope	YES Continue ↓
Decision: Could 200 or more people reasonably be expected to be present at the same time?	
NO Not currently in scope, but good practice is still recommended	YES Continue ↓
STANDARD TIER REQUIREMENTS	
↓	
Decision: Could 800 or more people reasonably be expected to be present?	
NO Standard Tier Requirements	YES Enhanced Tier <i>Additional security measures required</i>