



Home Office

Terrorism (Protection of Premises) Bill - Standard Tier Consultation 2024 Results

Contents

Introduction and contact details	2
Complaints or comments	2
Background	3
Summary of responses	4
Demographic breakdown	4
Methodology	5
Overview of responses	7
Responses to specific questions	10
Impact Assessment, Equalities and Welsh Language	30
Impact Assessment	30
Equalities	30
Conclusion and next steps	31
Consultation principles	32
Annex A – List of respondents	33

Introduction and contact details

This document is the post-consultation report for the consultation paper, Terrorism (Protection of Premises) Bill - Standard Tier Consultation.

It will cover:

- Introduction: Approach
- the background to the consultation
- a summary of the consultation responses
- a detailed response to the specific questions raised in the report
- the next steps following this consultation.

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This report is also available at
<https://www.gov.uk/government/collections/terrorism-protection-of-premises-bill-2024>

Alternative format versions of this publication can be requested from
martynslaw@homeoffice.gov.uk

Complaints or comments

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

Background

The consultation paper ‘Terrorism (Protection of Premises) Bill - Standard Tier Consultation’ was published on 05 February 2024. 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. It invited comments on the requirements proposed in relation to standard duty premises (those with a capacity of 100-799), which are referred to as the “standard tier”. The consultation was open to the public and targeted organisations, businesses, local and public authorities, and/or individuals who own or operate publicly accessible premises. In particular, it sought views from those responsible for the smaller premises which would fall within the standard tier. The purpose of the consultation was to seek views on the previous Government’s proposed revised approach to the standard tier.

The consultation period closed on 18 March 2024 and this report summarises the responses, including how the consultation process will influence the further development of the policy proposal consulted upon. The data collection and analysis for this consultation was conducted by Verian, on behalf of the Home Office, to understand views towards the proposed standard tier requirements.

The Impact Assessment was not commented on by those responding to the consultation. Therefore, the consultation stage Impact Assessment, which was presented at Annex A of the consultation document, has not been revised.

A full list of respondent demographics is at Annex A.

Summary of responses

1. A total of 1,981 full responses to the consultation paper were received, of which 13 were submitted via the Word version. Partial or incomplete responses to the survey (i.e. someone who did not complete the survey in full) were not included in analysis so that all survey questions are reflective of a consistent sample throughout.

Demographic breakdown

1. Of the 1,981 respondents, four in ten (40%) owned or operated premises or events, and one in six (17%) were either a security consultant or were responsible for security at premises or events.

Figure 1: Respondent type

Respondent type	%	Number of respondents
NET: Owns or operates premises or events	40	795
<i>Own or operate premises</i>	35	688
<i>Own or operate an event</i>	5	107
NET: Responsible for security or security consultant	17	333
<i>Responsible for security at premises or events</i>	13	259
<i>Security consultant</i>	4	74
Work at a premises or event in scope, but do not own or operate it	10	192
Interested member of the public	10	195
Other	21	416
Prefer not to say	2	36
Don't know	1	14

QA. Which of the following best describes you or your organisation? Based on all respondents (1981).

2. Among those who own or operate premises or events, a majority stated that these fell within the standard tier (86%), and these were typically at the lower end of capacity requirements for standard tier premises (57% of those who own or operate a premises or event said they had a capacity of 100-299).

Figure 2: Estimated capacity of standard tier premises

Capacity of premises	%
Less than 100	6
NET: 100-799 <i>standard tier</i>)	81
100-199	42
200-299	15
300-399	6
400-499	6

Terrorism (Protection of Premises) Bill - Standard Tier Consultation

500-599	4
600-699	2
700-799	6
800 or more (Enhanced Tier)	6
Not calculated presently, don't own or operate any or don't know	7

QC. What is the estimated capacity of your standard tier premises based on capacity calculations you already have in place? Based on all who own, operate or are responsible for security at premises/events and have premises (1056).

3. A broad spectrum of sectors was represented within survey respondents who owned, operated or were responsible for security at premises or events, with the largest sectors being village halls/community centres (24%) and places of worship (23%).

Figure 3: Sector which respondent/their organisation primarily operates in

Sector	%
Village hall/community centre	24
Places of worship	23
NET: Entertainment, visitor attractions and public libraries/museums/galleries	12
<i>Entertainment e.g. theatres, cinemas, and concert halls and arenas</i>	9
<i>Visitor attractions</i>	2
<i>Public libraries, museums and galleries</i>	1
NET: Retail, hospitality and nightlife	11
<i>Hospitality and nightlife e.g. bars, pubs, restaurants, cafés, nightclubs</i>	8
<i>Retail e.g. stores or shopping centres</i>	3
NET: Healthcare, public transport and public services/facilities	8
<i>Public services and facilities</i>	6
<i>Healthcare</i>	2
<i>Public transport, including train stations, ports and airports</i>	1
NET: Sports grounds and recreation/leisure	5
<i>Recreation and leisure e.g. public sports/leisure centres, ice rinks and gyms</i>	3
<i>Sports grounds</i>	2
Education and childcare	4
NET: Other sectors	10
<i>Public conference centres, exhibition halls and other venues for hire</i>	2
<i>Hotels, holiday parks and similar holiday accommodation</i>	2
<i>Other sector</i>	6
Not applicable or don't know	2

QF. In which of the following sectors do you or your organisation primarily operate? Based on all who own, operate or are responsible for security at premises/events (1128).

Methodology

4. The purpose of analysing the responses was to gauge the varying levels of support or disagreement for the proposed revisions to the standard tier, including looking at the

breakdown of responses per sector and size of premises. The responses will support our understanding of the perceived impact of our proposals on premises within scope of the standard tier and determine any necessary amends required to the proposed revisions.

5. The questionnaire consisted of seven profiling or demographic questions, and then a main survey module of up to 12 questions made up of 10 closed questions and 2 open-ended questions, plus up to 7 follow-up questions depending on the answers given to the main 12 survey questions.
6. Respondents were asked to complete the survey online in English or Welsh. In exceptional circumstances, respondents were able to complete a Word version of the survey and return it by post or email to the Home Office.
7. Results are indicative of the people who completed the consultation survey and therefore conclusions drawn are based on consultation survey participants rather than any population more broadly. Respondents to public consultations are somewhat self-selecting: despite efforts by the Home Office to publicise the consultation and encourage engagement, respondents self-select to take part.
8. This report contains responses to closed questions, as well as common themes mentioned in responses to open-ended questions based on thematic coding undertaken by Verian, our external analysis provider. Data from responses to the quantitative (closed) questions in the consultation (i.e. those that invited respondents to choose an answer) were extracted and analysed. All qualitative responses (i.e. those responses to open questions) were also logged and analysed.
9. Where question routing instructions were not heeded by respondents in their Word questionnaire submission, for example, not answering a question that was compulsory in the online survey - a response of 'Don't know' was inputted. This method was used consistently to avoid researcher bias in the data.
10. The coding process is conducted by humans ¹(not automated) and identifies common themes from the initial batch of responses. Subsequent batches of open-ended responses are similarly coded, with codes created for responses with more than c.5 mentions throughout the process.
11. The 'Other' codes include all responses that don't directly answer or are irrelevant to the question, or that don't fit with any of the other responses. Any responses including themes that are irrelevant, not directly answering the question, or that do not fit with any of the other responses are also coded as 'Other'.
12. Groups of similar codes have been combined into nets. Nets represent the proportion of respondents who have selected at least one of the codes within each group. For questions where respondents were able to select multiple responses, the net will therefore be equal to or less than the total number of responses of the codes grouped within it.
13. Quantitative data comparisons, where stated as "statistically significant" are to the 95% confidence level. All quotes included in the report have been selected by Verian as

¹ There is an element of subjectivity when coding qualitative responses, which has been minimised by carrying out additional quality assurance.

examples to illustrate the key themes that came out from analysis - they are not used to show the proportion of respondents who answered in this way.

Overview of responses

14. Overall, perceptions of Martyn's Law were mixed, with **no overarching consensus**:

- Around half (48%) of respondents agreed that those responsible for premises within the standard tier should have a legal obligation to be prepared for a terrorist attack.
- Six in ten (59%) felt the revised requirements for standard tier premises were more appropriate for the broad spectrum of premises in scope than they had been in the previous draft of the Bill.
- Around four in ten (42%) felt that the revised training requirements place less burden on standard tier organisations.

15. There were also mixed perceptions, and some level of concern, about **difficulty of implementation** and the **burden** it would place on organisations:

- Almost half (46%) felt the revised requirements would be difficult to implement.
- Four in ten (43%) felt the procedures in Martyn's Law would place more burden on standard tier premises than those for Health & Safety and Fire Safety.
- Just over half (54%) of standard tier premises operators/owners were at least somewhat concerned that the cost of meeting the standard tier requirements would affect their organisation's financial ability to continue operating.
- Almost six in ten (58%) felt the revised requirements would be at least slightly successful in improving feelings of safety, but three in ten (30%) felt they would not be at all successful.
- **Concerns fell broadly into four themes; additional burden (admin / time / effort); financial burden; concern about training and concern about the impact on staff and volunteers.**

16. There were some indications that respondents had a **sense of uncertainty** and perhaps felt they could not foresee the impact of the changes:

- A quarter (24%) answered that they did not know what the unintended consequences of taking forward the revised standard tier requirements could be.
- Three in ten (29%) said they did not know how costs of the revised standard tier requirements should be met.

- One in five (19%) did not name a reason why they felt the revised requirements placed more burden on standard tier premises compared to procedures for Health & Safety and Fire Safety.
- Around three in ten (28%) stated they did not know why they felt the revised training requirements were more burdensome.

17. Those from **smaller capacity premises** (100-299) and from **places of worship and village halls / community centres** showed particular concern for the impact on smaller venues and their ability to meet the revised requirements with the resources available to them.

18. Among respondents from premises with a capacity of 100-299:

- Around four in ten (39%) agreed that those responsible for premises within the standard tier should have a legal obligation to be prepared for a terrorist attack. Nearly half (46%) of those who disagreed, said they believe only larger premises should have a legal obligation.
- Around half (51%) reported that the revised requirements would be difficult to take forwards.
- Around half (49%) reported that they felt Martyn's Law procedures would place more burden than Health & Safety and Fire Safety procedures on standard tier premises.
- Six in ten (58%) were at least somewhat concerned that the cost of meeting the standard tier requirements will affect their organisation's financial ability to continue operating.
- Around four in ten (38%) felt the new requirements would not be at all successful at improving feelings of safety for staff and visitors at premises within the standard tier.

19. Among those from places of worship or village halls/community centres:

- Only around three in ten of those from places of worship (30%) and village halls/community centres (33%) agreed that those responsible for premises within the standard tier should have a legal obligation to be prepared for a terrorist attack. Over half (54%) of those from village hall/community centres (which typically had a smaller capacity than premises across the other sectors; 72% had a capacity of 100-199) who disagreed, said they believe only larger premises should have a legal obligation.
- Over half of those from places of worship (58%) and village halls/community centres (56%) felt the revised requirements would be difficult to take forwards, mainly due to perceived burden in terms of time or effort.

Terrorism (Protection of Premises) Bill - Standard Tier Consultation

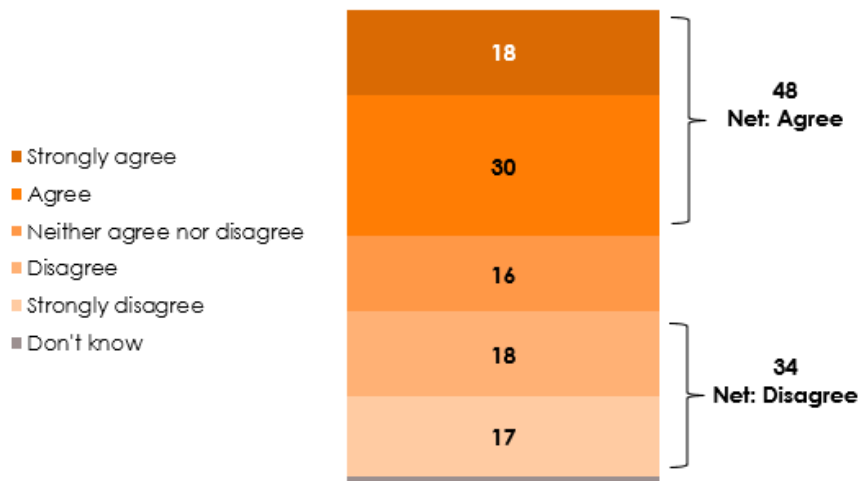
- Those from village halls/community centres (55%) and places of worship (52%) were most likely to believe that Martyn's Law procedures would place more burden than Health & Safety and Fire Safety procedures on standard tier premises.
- Concern about the organisation's financial ability to operate was highest among places of worship (64%) and village halls/community centres (62%).
- Those in village halls/community centres (44%) and places of worship (42%) were most likely to feel the new requirements would not be at all successful in improving the feeling of safety for staff and visitors.

Responses to specific questions

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?

Overall, just under half (48%) of all respondents agreed that those responsible for premises within the standard tier should have a legal obligation to be prepared for a terrorist attack, while one in three (34%) disagreed.

Figure 4: Whether those responsible for standard tier premises should have a legal obligation to be prepared for a terrorist attack – (% all respondents)



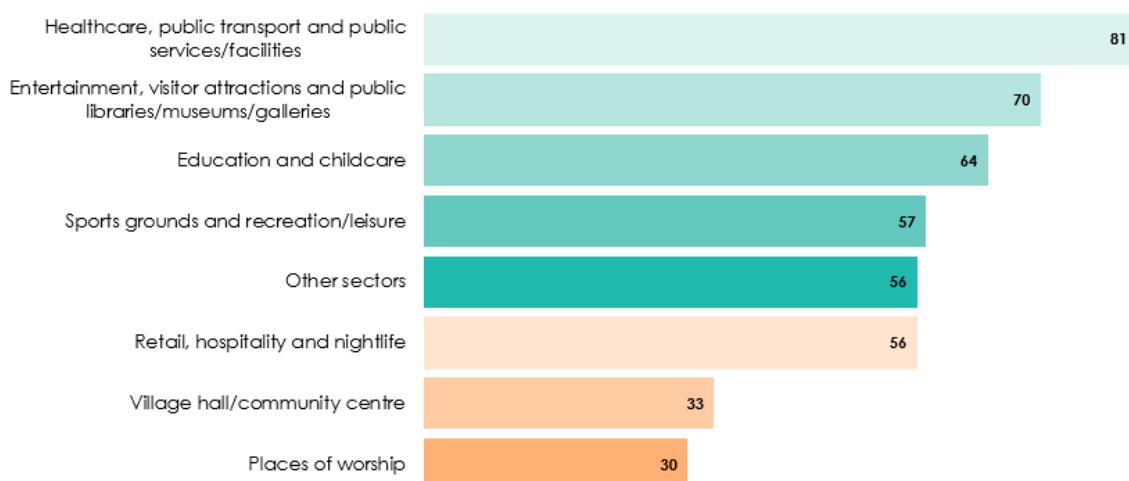
Q1. To what extent do you agree or disagree that those responsible for premises within the standard tier should have a legal obligation to be prepared for a terrorist attack? Based on all respondents (1981).

There was variation among sub-groups in agreement that those responsible for premises within the standard tier should have a legal obligation to be prepared for a terrorist attack:

- Statistically, those in for-profit organisations were significantly more likely to agree (66%), than those in not-for-profit organisations (43%).
- Statistically, those in higher capacity premises were significantly more likely to agree than those in lower capacity premises, with agreement growing as capacity increased; 100-299 (39%), 300-499 (52%) and 500-799 (69%).

There was considerable variation by sector, with eight out of ten (81%) of those in healthcare, public transport and public services/facilities agreeing, compared with only around three in ten of those in places of worship (30%) and village halls/community centres (33%).

Figure 5: Agreement that those responsible for standard tier premises should have a legal obligation to be prepared for a terrorist attack – by sector (% agree)



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? Based on all respondents in each sector – Village Hall/community centre (270), Places of worship (264), Entertainment, visitor attractions and public libraries/museums/galleries (132), Retail, hospitality and nightlife (127), Healthcare, public transport and public services/facilities (94), Sports grounds and recreation/leisure (61), Education and childcare (44), Other sectors (112).

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? (only asked to those who answered ‘disagree’ or ‘strongly disagree’ to Q1).

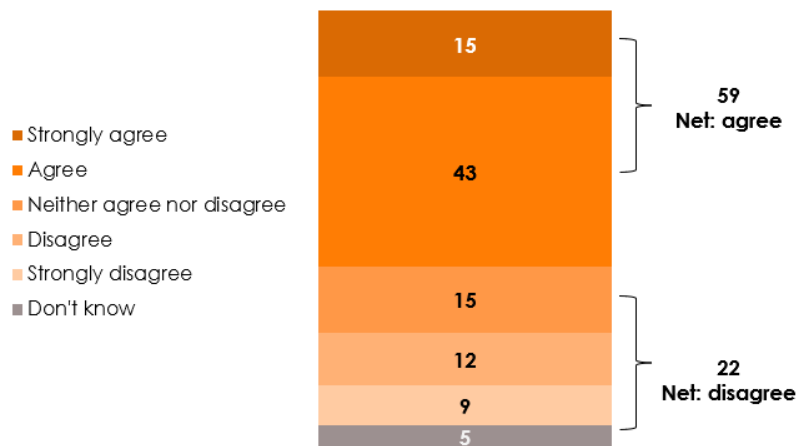
Among respondents who disagreed that those responsible for standard tier premises should have a legal obligation to be prepared for a terrorist attack:

- The primary reasons for disagreeing were that they believed only larger premises should have a legal obligation (40%) or that they did not believe the obligation should be legal (27%).
- One in ten (10%) said only the Government should need to be prepared to reduce the impact of terrorism, while one in twenty did not believe that there should be any responsibility for premises to be prepared for a terrorist attack (6%) or that premises of any size should have a legal obligation (5%).
- Nearly half (46%) of those who disagreed from premises with a capacity of 100-299 said they believe only larger premises should have a legal obligation.
- Respondents representing village halls/community centres (which typically had a smaller capacity than premises across the other sectors; 72% had a capacity of 100-199) were particularly likely to state that they disagreed because they believed only larger premises should have a legal obligation (54%).

20. 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)?

Given the revised requirements for standard tier premises, six in ten (59%) respondents felt these were more appropriate than the previous requirements for the broad spectrum of premises in scope (Figure 6).

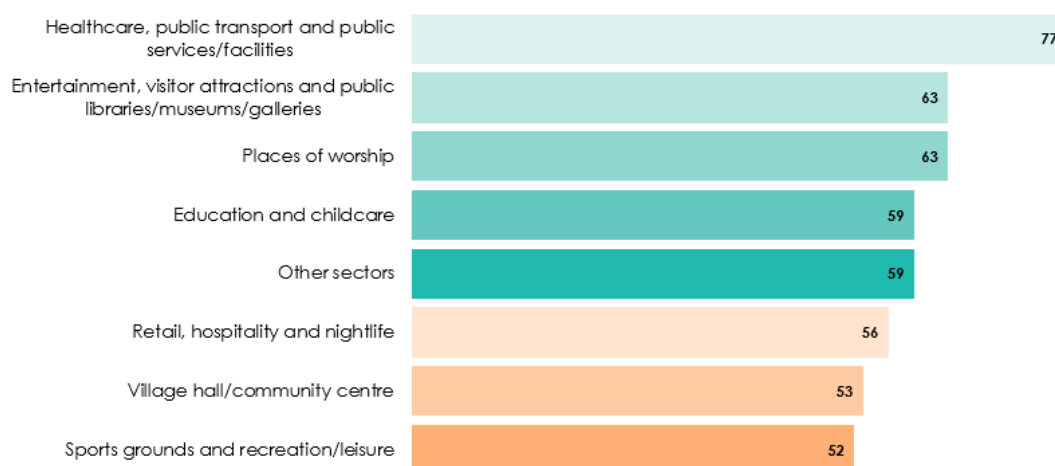
Figure 6: Agreement that the revised requirements are more appropriate for broad spectrum of premises – (% all respondents)



*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)?
Based on all respondents (1981).*

Those who owned or operated premises were more likely to agree (62%) that the revised requirements were more appropriate than those who owned or operated events (51%). Across all sectors, agreement that the revised requirements were more appropriate varied. Statistically, agreement among those in healthcare, public transport and public services/facilities (77%) was significantly higher than all other sectors. Just over half of those in village halls/community centres (53%) and sports grounds and recreation/leisure (52%) agreed.

Figure 7: Agreement that the revised requirements are more appropriate for a broad spectrum of premises – by sector (% agree)



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)? Based on all respondents in each sector – Village hall/community centre (270), Places of worship (264), Entertainment, visitor attractions and public libraries/museums/galleries (132), Retail, hospitality and nightlife (127), Healthcare, public transport and public services/facilities (94), Sports grounds and recreation/leisure (61), Education and childcare (44), Other sectors (112).

Q2a. Why do you agree that the revised requirements are more appropriate than the previous requirements? (only asked to those who answered ‘agree’ or ‘strongly agree’ to Q2).

Among those who agreed that the revised requirements were more appropriate, over half felt the proposed changes were more appropriate for the broad spectrum of premises (54%) or that the proposed changes removed unnecessary administrative burden for small premises (56%). However, despite agreeing they were more appropriate, a small proportion of respondents still felt the revised requirements could go further (<5% spontaneously mentioned this):

“The proposed changes reduce the burden on small businesses... But the capacity for standard tier should not start at 100 as it covers far too many businesses”.

“I think the proposed changes are more appropriate but remain disproportionate to the level of risk”.

“I think the proposals are better, but they still leave too much unclear”.

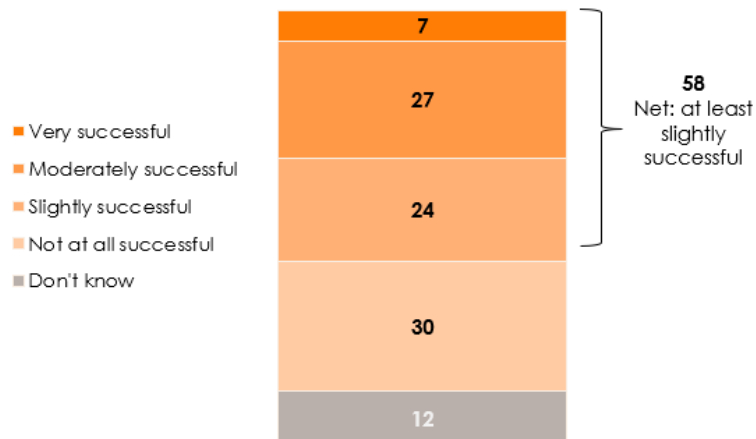
Q2b. Why do you disagree that the revised requirements are more appropriate than the previous requirements? (only asked to those who answered ‘disagree’ or ‘strongly disagree’ to Q2).

A similar proportion (58%) of those who disagreed felt that the proposed changes did not go far enough to remove unnecessary burdens. This was particularly the case for respondents in lower capacity premises (100-299 69%, 300-499 73% vs 500-799 40%) who disagreed and from village halls/community centres (78%) and places of worship (69%).

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?

One in three respondents (33%) felt that the revised standard tier requirements would be very or moderately successful in improving feelings of safety for staff and visitors at premises within the standard tier. Almost six in ten (58%) felt they would be at least slightly successful, but one in three (30%) felt they would not be at all successful.

Figure 8: Perceived success of revised standard tier requirements in improving feelings of safety for staff and visitors – (% all respondents)



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? Based on all respondents (1981).

Those in higher-capacity premises were more likely to think the revised requirements would be very or moderately successful at improving feelings of safety for staff and visitors (capacity of 500-799 50% vs 300-499 37% vs 100-299 29%). Around four in ten (38%) of those in premises with a capacity of 100-299 felt they would not be at all successful.

Those in healthcare, public transport and public services/facilities (57%) were most likely to feel the revised requirements would be very or moderately successful at improving feelings of safety, while those in village halls/community centres (44%) and places of worship (42%) were most likely to feel they would be not at all successful.

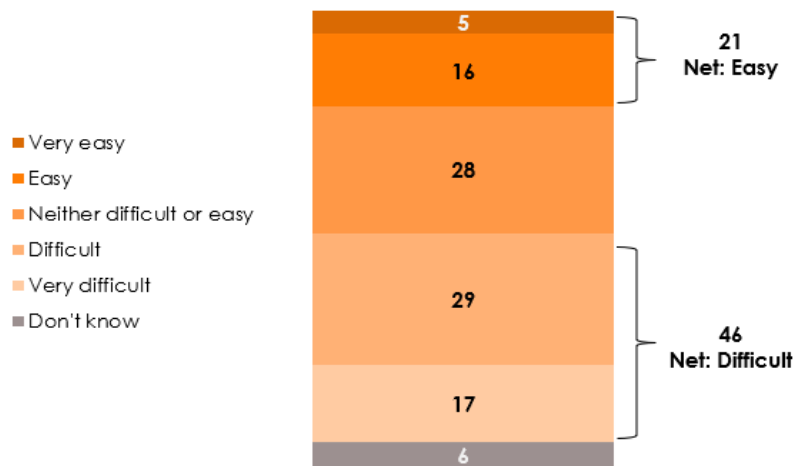
Q3a. Why do you think the standard tier requirements will not be or will only be slightly successful at improving feelings of safety for staff and visitors at premises within the standard tier? (only asked to those who answered 'slightly successful' or 'not at all successful' to Q3).

Among those who said the revised requirements will be only slightly successful or not at all successful, the main reasons given for not believing that the standard tier requirements would improve feelings of safety were that they would not have any positive impact (36%), other things would be required to improve feelings of safety (20%), or that premises already do the things that the standard tier now requires (14%).

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)?

Although the balance of feeling was that the revised requirements were more appropriate for standard tier premises, almost half of respondents (46%) felt these revised requirements would be difficult to implement, with only one in five (21%) believing they would be easy.

Figure 2: Ease of taking forward the revised requirements - (% all respondents)

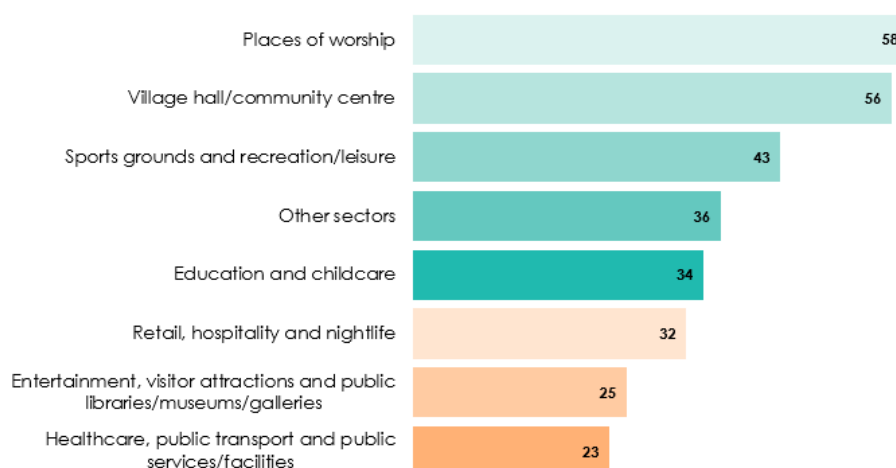


Q4. How easy or difficult do you think it will be for those responsible for standard tier premises to take forward the revised requirements? Based on all respondents (1981).

Across all sectors, few felt that the revised requirements would be easy to take forward. The highest proportion of those who thought it would be easy were in Education and childcare (36%) and Entertainment, visitor attractions and public libraries/museums/galleries (35%).

In contrast, the proportion who felt the revised requirements would be difficult to take forward (Figure 10) ranged from one in four in Healthcare, public transport and public services/facilities (23%) and Entertainment, visitor attractions and public libraries/museums/galleries (25%) to over half in Places of worship (58%) and Village halls/community centres (56%). Those from lower-capacity premises were more likely to say it would be difficult to take the changes forward than those in higher-capacity premises (capacity of 100-299 51% vs 300-499 38% & 500-799 31%).

Figure 3: Feel it will be difficult to take forward the revised requirements – by sector



Q4. How easy or difficult do you think it will be for those responsible for standard tier premises to take forward the revised requirements? Based on all respondents in each sector – Village Hall/community centre (270), Places of worship (264), Entertainment, visitor attractions and public libraries/museums/galleries (132), Retail, hospitality and nightlife (127), Healthcare, public transport and public services/facilities (94), Sports grounds and recreation/leisure (61), Education and childcare (44), Other sectors (112).

Q4a. Why do you think the revised requirements will be difficult for those responsible for standard tier premises to take forward? *(only asked to those who answered 'difficult' or 'very difficult' to Q4).*

The dominant reason given as to why the revised requirements would be difficult to take forwards was that they were too burdensome (in terms of time or effort) to implement (74%). This was particularly felt to be the case for Places of worship (82%) and Village halls/community centres (81%). Around one in three of those who felt the new requirements would be difficult felt the requirements were too costly (35%) or too complicated (32%) to implement.

Q5. What unintended consequences, if any, do you think could result from taking forward the revised standard tier requirements?

Before being asked specific concerns about the new requirements, such as those around training and financial concerns, all respondents were asked if they felt there were likely to be any unintended consequences arising from taking forward the revised standard tier requirements. A quarter of respondents (24%) said they did not know and one in five (20%) did not think there would be any unintended consequences. The main unintended consequences cited were:

- Concerns about resourcing and finding it harder to attract or retain staff and volunteers (18%):

“[There will be a] reduction in the number of volunteers willing to take on responsibility for running an activity/event because of the extra burden of responsibility.”

“Staff/volunteers feeling obligated to take on responsibilities they might not be comfortable with, or feel they have to put themselves at risk in an emergency to comply with procedures and avoid consequences.”

“Many rural churches have a regular congregation in single figures and even a wedding might not exceed 100 people. The risk is that another compliance requirement is the straw that breaks the camel’s back for hard-pressed volunteers. This will make it harder to recruit, retain and replace volunteers.”

- The negative impact it could have on lower capacity venues (13%):

“Any penalties, for not complying properly with standard tier requirements, are liable to disproportionately impact upon smaller, volunteer-reliant organisations such as small- to medium-sized churches.”

“There may be a particular impact on community venues which are volunteer-run and lack capacity and expertise to comply.”

Those from Places of worship and Village halls/community centres were more likely than those in other sectors to mention either of these concerns.

All thematically-categorised concerns mentioned by at least 5% of all respondents are shown in Figure 11.

Figure 4: Unintended consequences of taking forward standard tier requirements

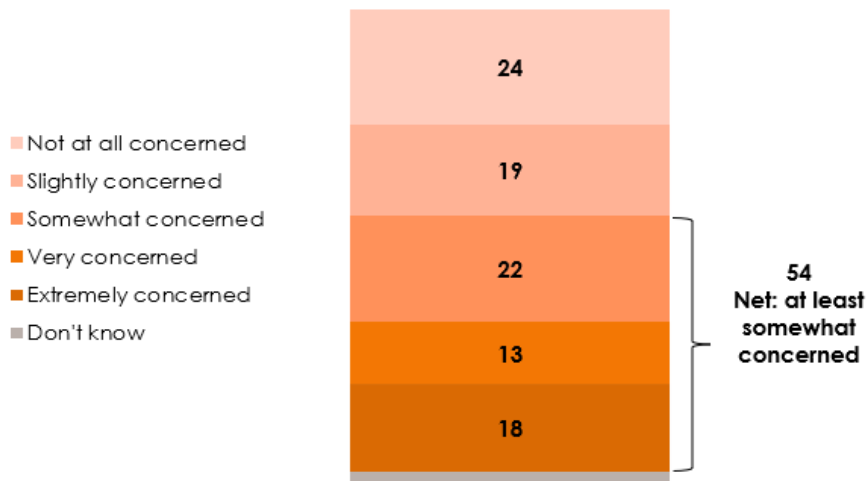
Unintended consequences	%
Don't know	24
I don't think there will be any unintended consequences	20
Resourcing / Harder to attract/retain staff and volunteers	18
Negative impact on lower capacity venues	13
Premises closing or becoming unviable	9
Increased/ additional costs (general)	9
Could affect events happening / cause event cancellations	6
Increased worry/anxiety amongst those attending venues or events	5
Lack of understanding of requirements	5
Nobody wanting to take responsibility	5

Q5. What unintended consequences, if any, do you think could result from taking forward the revised standard tier requirements? SHOWING CONSEQUENCES STATED BY AT LEAST 5% OF RESPONDENTS. Based on all respondents (1981).

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?

Given the estimates in the Impact Assessment, just over half (54%) of standard tier premises operators/owners were at least somewhat concerned that the cost of meeting the standard tier requirements would affect their organisation’s financial ability to continue operating.

Figure 52: Level of concern that the cost of meeting standard tier requirements will affect organisation’s financial ability to continue operating - (% all ST owners and operators)



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? Based on all owners/operators of standard tier premises excl. consultants (889).

Respondents in premises with a capacity of 100-299 were statistically significantly more likely to be at least somewhat concerned (58%) about meeting the costs than those in premises with a capacity of 300-499 (45%) or 500-799 (43%). Concern was highest among Places of worship (64%) and Village halls/community centres (62%), with around four to five in ten in all other sectors at least somewhat concerned.

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. (only asked to those who answered ‘somewhat concerned’ or ‘very concerned’ or ‘extremely concerned’ to Q6).

As shown in Figure 13 below, the main reasons given for concern were that the additional costs would hurt the organisation financially (47%) or that it would add to existing financial struggles (27%), for example:

“We are going through very difficult economic times and extra costs are not helping.”

“The general cost of living has increased. Heating of small organisations such as ourselves already have utility bills which have tripled in the past year. Adding additional costs for the process, along with staff time and administration is unfeasible.”

“Putting additional costs on already strained, especially smaller, organisations seems disproportional and unfair.”

“Parish finances are already stretched to near breaking point; burdening them further in small communities will cause great harm...”

Figure 63: Reasons for concern about organisation's ability to meet the costs of standard tier requirements

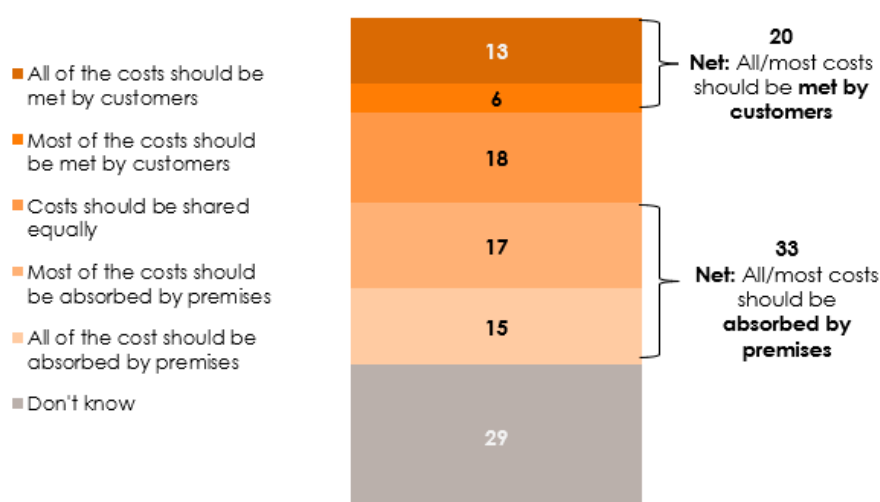
Reasons given	%
Additional costs / will hurt our organisation financially	47
Add to already existing financial struggles	27
Organisation relies on donations / funding / not for profit	20
Inappropriate for our type of venue/premises	20
Organisation relies on volunteers / extra burden on volunteers	12
It will make us less viable as an organisation	10

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. SHOWING REASONS GIVEN BY AT LEAST 10% OF RESPONDENTS. Based on all who are at least somewhat concerned about their organisation's ability to meet the costs of standard tier requirements (477).

Q7. Given this cost assessment, how would you think any costs of the standard tier should be met?

One in five (20%) felt that all or most of the standard tier costs should be met by customers, while one in three (33%) felt that all or most of the costs should be absorbed by the premises. Three in ten (29%) stated they didn't know how the costs should be met.

Figure 74: How standard tier costs should be met – (% all respondents)



Q7. Given this cost assessment, how would you think any costs of the standard tier should be met? Based on all respondents (1981).

Respondents from premises with a capacity of 100-299 were statistically significantly more likely to think that all or most of the costs should be met by customers (24%) than those in premises with a capacity of 300-499 (15%) or 500-799 (13%).

Those from Village halls/community centres were more likely than those in any other sector to feel that most or all of the costs should be met by customers (32%). Those in Healthcare, public transport and public services/facilities (50%), Education and childcare

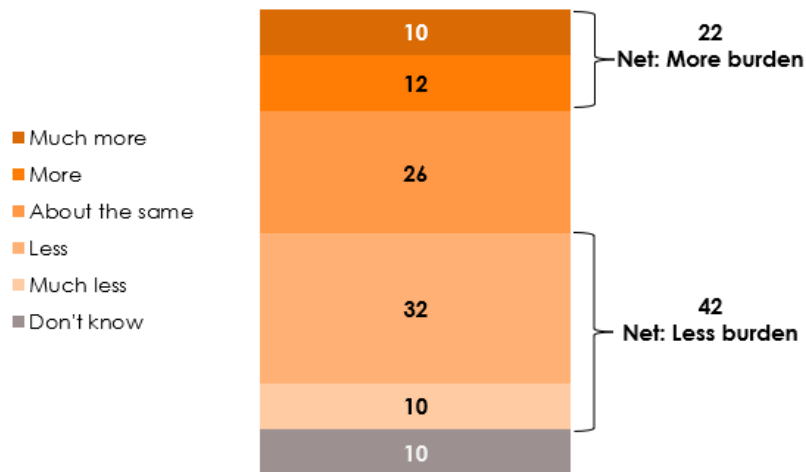
(50%) and entertainment, visitor attractions and public libraries/museums/galleries (47%) were most likely to feel that most or all of the costs should be absorbed by the premises. Over half (53%) of those in Places of worship said they did not know, compared with no more than a quarter of those in any other sector.

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.

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.

Given these changes, four in ten respondents (42%) felt that the revised training requirements now place less burden on standard tier organisations compared to previous Bill requirements, while just under a quarter (22%) felt they now place more burden on standard tier organisations.

Figure 85: Whether changes to training requirements place more or less burden on standard tier organisations than those set out in the previous draft Bill – (% all respondents)



Q8. Do you think the new approach to training places more or less burden on standard tier organisations compared to the previous approach? By ‘burden’, we mean any burden including financial, time, effort or other. Based on all respondents (1981).

Responses by sector ranged from 15% of Places of worship to 26% of Village halls/community centres feeling the revised training requirements placed more burden, and 34% of those in the Retail, hospitality and nightlife sector, to 50% of those in Places of worship felt the revised training requirements placed less burden in comparison with those set out previously.

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.
(only asked to those who answered 'more' or 'much more' to Q8).

The main reasons given for the revised training requirements placing more burden on standard tier organisations are set out in Figure 16, and mainly related to the impact on staff or volunteers, and additional time and effort, costs and training requirements.

“Additional stress added to volunteers and staff due to increased responsibility.”

Respondent from village hall/community centre, capacity of 200-299

“They are absorbing the risk and as such they will be responsible directly or indirectly for ensuring the training provided is appropriate, this will have a financial, time, and effort burden on the venue.”

Respondent from 'other sector'

It should be noted that a significant minority, around three in ten (28%), stated they did not know why they felt the revised training requirements would be more burdensome.

Figure 96: Reasons why revised training approach will place more burden on standard tier organisations than previous approach

Reasons given	%
Don't know	28
NET: Impact on staff/volunteers	23
<i>Extra burden on volunteers</i>	15
<i>Strain / stress on staff</i>	3
<i>More staff required</i>	3
<i>Loss of volunteers</i>	3
<i>We don't have staff / have very few staff</i>	2
NET: Time / effort	21
<i>Time consuming</i>	13
<i>Additional paperwork / bureaucracy</i>	5
<i>Extra burden / effort (general)</i>	5
NET: Financial burden	19
<i>Extra costs</i>	16
<i>Organisations already struggling financially</i>	3
<i>Additional cost of training</i>	2
NET: Additional training	17
<i>Extra training needed</i>	15
<i>Understanding training needs</i>	2
Measures difficult/impossible to action in small premises	13
New / unfamiliar requirements for some venues	6

Q8a. Why do you think there is more burden on standard tier organisations with the new approach compared to the previous approach? SHOWING REASONS GIVEN BY AT LEAST 6% OF RESPONDENTS. Net figures represent the proportion of respondents who mentioned at least one of the codes within the net. The net figure will therefore be equal to or less than the total number of responses of the codes grouped within it. Based on all respondents who think there is more burden on standard tier organisations with the new approach (436).

Although measures being difficult/impossible to action in small premises was mentioned overall by 13% of respondents. This was a particular concern in Village halls/community

centres (21%) and Places of worship (20%) and was only mentioned by one respondent outside of these two sectors.

Q9. We'd like to hear about any other procedures that could be utilised in standard tier premises were a terrorist attack to occur (i.e. other than evacuation, invacuation, lockdown and communications procedures).

The majority of respondents (72%) did not provide an answer to this question. Suggestions were made by a small proportion of respondents, and these are shown in Figure 17.

Figure 107: Additional procedures that could be utilised in standard tier premises were a terrorist attack to occur.

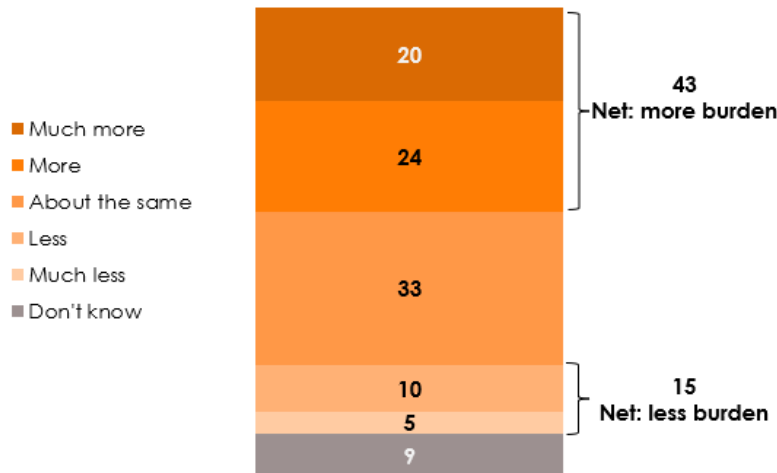
Additional procedures	%
Don't know/ Not applicable	72
Physical measures (e.g. fire doors, bag scanning)	3
First aid training	3
Other procedures not necessary/not possible to implement	2
More/better training	2
Trauma management/trauma kits	2
Improved policing/better links with police and intelligence networks	2
Fire safety procedures	2
Pre/post event communication between premises	2
Risk assessments	2
Specialised counter-terrorism training	1
What to do in the event of an attack or threat of an attack	1
Counter-terrorism procedures (ACT/SCaN/Run Hide Tell)	1
Behavioural awareness training	1
Mass communication	1
Mentions of contacting emergency services (general)	1
(More) guidance (general mentions)	1
None	2
Other	9

Q9. We'd like to hear about any other procedures that could be utilised in standard tier premises were a terrorist attack to occur (i.e. other than evacuation, invacuation, lockdown and communications procedures). SHOWING SUGGESTIONS GIVEN BY AT LEAST 1% OF RESPONDENTS. .

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.

Four in ten (43%) respondents felt the procedures in Martyn’s Law would place more burden on standard tier premises than the procedures for Health & Safety and Fire Safety, while just 15% felt they would be less burden.

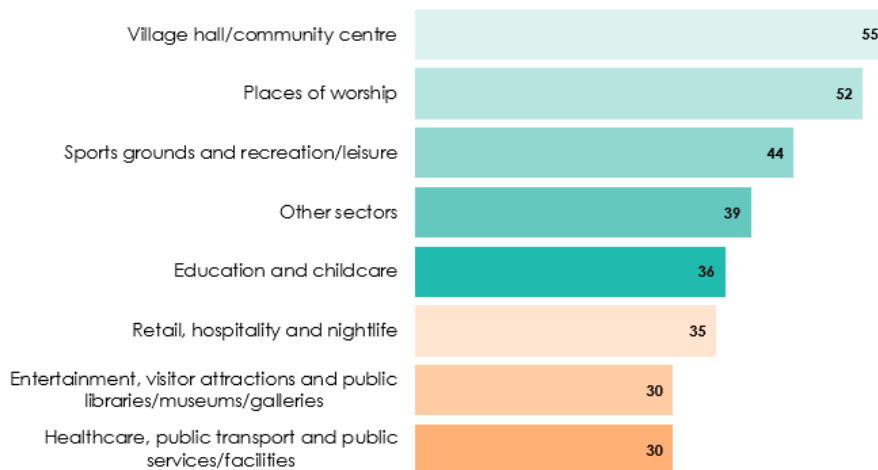
Figure 118: Whether procedures in Martyn's Law place more or less burden on standard tier premises than Health & Safety and Fire Safety procedures – (% all respondents)



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 or Fire Safety? Based on all respondents (1981).

Across all sectors, respondents were more likely to feel that Martyn’s Law procedures placed more, rather than less, burden than Health & Safety and Fire Safety procedures. Those in lower-capacity premises were statistically significantly more likely to say the Martyn’s Law procedures would place more burden than those in higher-capacity premises (capacity of 100-299 49% vs 300-499 33% & 500-799 38%). Those in Village halls/ community centres (55%) and Places of worship (52%) were most likely to believe that Martyn’s Law procedures would place more burden than Health & Safety and Fire Safety procedures on standard tier premises.

Figure 129: Believe that Martyn's Law procedures will place more burden on standard tier premises than procedures for Health & Safety and Fire Safety – by sector (% all respondents)



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 or Fire Safety? Based on all respondents in each sector – Village

hall/community centre (270), Places of worship (264), Entertainment, visitor attractions and public libraries/museums/galleries (132), Retail, hospitality and nightlife (127), Healthcare, public transport and public services/facilities (94), Sports grounds and recreation/leisure (61), Education and childcare (44), Other sectors (112).

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 (only asked to those who answered 'much more' or 'more' to Q10).

A variety of reasons were given as to why Martyn's Law procedures would place more burden on standard tier premises than procedures for Health & Safety and Fire Safety. The major themes mentioned included additional time, cost, training and paperwork requirements:

- Nearly a quarter of respondents (23%) felt that Martyn's Law requires additional time or effort.

"There are additional skills, experience and processes needed in order to meet the requirements."

"Fire safety procedures are long established and require minimal work to update them; the standard tier procedures will be completely new work that businesses are unfamiliar with."

- One in five (20%) said Martyn's Law has additional requirements.

"Additional considerations needed, over and above the more familiar fire & H&S."

"Premises managers will need to incorporate the procedures into those that are already in place."

"It is an unnecessary burden (to many lower end of the capacity spectrum venues, or venues not at risk by their nature of operating) imposed on top of the already present administrative burdens of H&S and Fire provisions"

"Unlike procedures for Health & Safety and Fire Safety, which already have established frameworks and protocols, the requirements outlined in Martyn's Law will necessitate a more significant adjustment for premises."

- Over one in ten (14%) felt Martyn's Law has increased or additional costs.

"This is an additional financial and time burden. Health & Safety and Fire Safety are a given. It doesn't matter how small a burden this law

is compared to the above, it is the “straw that breaks the camel’s back” for many.”

“It is a complex area and premises cannot afford the additional infrastructure.”

“New systems in place always incur extra cost.”

- Over one in ten (14%) felt Martyn’s Law requires more training.

“Additional training and drafting procedures for any response will be required over and above standing H&S.”

“The training of thousands of volunteers across the country in new and revised legislation will take a considerable amount of time and investment to implement.”

“This shift in organisational culture demands ongoing effort and resources to sustain, including regular reinforcement of security protocols and continuous training to address evolving threats.”

Themes mentioned by at least 5% are shown in Figure 18 and include reasons related to additional time, cost, training and paperwork requirements.

Figure 20: Reasons why Martyn’s Law procedures will place more burden on standard tier premises compared to procedures for Health & Safety and Fire Safety

Reasons given	%
Martyn’s Law requires additional time / effort	23
Martyn’s Law has additional requirements	20
Martyn’s Law has increased / additional costs	14
Martyn’s law requires more training	14
Martyn’s Law requirements are unsuitable for certain premises	10
Martyn’s Law requires more paperwork / assessments	10
Martyn’s requires more staff/volunteers	5
Martyn’s Law is more ambiguous / less clear	5
Don’t know	19

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? SHOWING REASONS GIVEN BY AT LEAST 5% OF RESPONDENTS. Based on all respondents who think the standard tier procedures will place more burden (855).

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 (only asked to those who answered ‘about the same’ to Q10).

Of those who perceived the burden to be the same, almost a quarter (23%) suggested the proposed procedures for Martyn’s Law and for those of Health & Safety and Fire Safety followed similar processes. The reasons provided are shown in Figure 21 with the top three reasons given as 'similar processes', 'similar time or effort' and 'duplication of existing practices'. However, there were also answers which mentioned ‘additional’ burdens which included ‘more training’, ‘additional requirements’ and ‘additional time/effort’. A quarter (25%) also said they did not know why they felt the standard tier procedures in Martyn’s Law will place the same burden, which suggested a lack of knowledge.

Figure 21: Reasons why Martyn's Law procedures will place about the same burden on standard tier premises compared to procedures for Health & Safety and Fire Safety

Reasons given	%
Similar processes	23
Time/effort is similar	10
Duplication of existing practices	9
Martyn’s Law requires more training	8
The same burden (other mentions)	6
Martyn’s Law has additional requirements	5
Already expected to do training	5
Martyn’s Law requires additional time/effort	5
Initial increase but the same once familiar	5

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 (only asked to those who answered ‘about the same’ to Q10). SHOWING REASONS BEING GIVEN BY AT LEAST 5% OF RESPONDENTS. Based on all respondents who think the standard tier procedures will place about the same burden (658).

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 (only asked to those who answered ‘less’ or ‘much less’ to Q10).

Of those who perceived the burden to be lower, a quarter of respondents (25%) believe that Martyn’s Law has less requirements or procedures than Health & Safety and Fire Safety and 13% believe the updated requirements are clearer or easier to follow than existing Health & Safety legislation. 21% of respondents said they did not know why the new procedures would place less burden.

Figure 22: Reasons why Martyn's Law procedures will place less burden on standard Tier premises compared to procedures for Health & Safety and Fire Safety

Reasons given	%
Martyn's Law has less requirements/procedures	25
Martyn's Law is easier/clearer than existing H&S legislation	13
Martyn's Law requires less training	10
Martyn's Law places reduced time/effort	9
Martyn's Law has reduced/decreased costs	6
Same procedures/policies in place	6
Similar processes	6
Martyn's Law requires less paperwork/assessments	5
Less burdens (other mentions)	5

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 (only asked to those who answered 'less' or 'much less' to Q10) SHOWING REASONS BEING GIVEN BY AT LEAST 5% OF RESPONDENTS. Based on all respondents who think the standard tier procedures will place less burden (297).

Q11. If volunteers work at your premises, who is responsible for planning Health & Safety and Fire Safety policies and procedures?

Half of respondents from organisations with volunteer staff (53%) reported that volunteers were responsible in the same way as paid employees in planning Health & Safety and Fire Safety policies and procedures.

Figure 23: Responsibility for planning Health & Safety and Fire Safety policies and procedures

Response	%
Volunteers are responsible in the same way as paid employees	53
Only paid employees are responsible	23
Volunteers are responsible but not in the same way as paid employees	20
Don't know	3

Q11. If volunteers work at your premises, who is responsible for planning Health & Safety and Fire Safety policies and procedures? Based on all who own or operate standard tier premises and have volunteers (651).

Q12. If volunteers work at your premises, what arrangements do you make for training on Health & Safety and Fire Safety?

Similarly, just over half (59%) stated that volunteers were trained in Health & Safety and Fire Safety in the same manner as paid employees.

Figure 134: Health & Safety and Fire Safety training arrangements for volunteers

Response	%
Volunteers are trained in the same manner as paid employees	59
Volunteers undertake different training from paid employees	17
Only paid employees complete mandatory training	14
Don't know	10

Terrorism (Protection of Premises) Bill - Standard Tier Consultation

Q12. *If volunteers work at your premises, what arrangements do you make for training on Health & Safety and Fire Safety? Based on all who own or operate standard tier premises and have volunteers (626).*

Impact Assessment, Equalities and Welsh Language

Impact Assessment

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 <https://www.gov.uk/government/collections/terrorism-protection-of-premises-bill-2024>

Equalities

The Public sector Equality Duty came in to force in April 2011 and public authorities including the Home Office are now required to have due regard to the need to achieve the objectives set out under s149 of the Equality Act 2010 to:

- (a) eliminating discrimination, harassment, victimisation and any other conduct that is prohibited by or under the Equality Act 2010;
- (b) advancing equality of opportunity between persons who share a relevant protected characteristic and persons who do not share it;
- (c) fostering good relations between persons who share a relevant protected characteristic and persons who do not share it.

The proportionate Equality Analysis considered the likely impacts on people with protected characteristics: disability, race, sex, gender reassignment, age, religion or belief, sexual orientation, pregnancy and maternity, marriage and civil partnership. This demonstrated no equality impact, due to its focus on raising thresholds.

No new points arose in relation to equalities impacts from the policy proposals. Any new evidence supplied was considered, to be sure the policy intentions were likely to still be achieved for people with protected characteristics. Any mitigations that were suggested by consultees should have also been considered, but none of these arose.

The PSED will be under continuous review with regards to any future potential amendments to the bill.

More information on the PSED can be found here:

<https://www.gov.uk/government/organisations/home-office/about/equality-and-diversity>

Conclusion and next steps

We introduced the Bill to Parliament on 12 September 2024. The Bill was amended to reflect the feedback from this consultation and its pre-legislative scrutiny.

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 Cabinet Office Consultation Principles 2018:

https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/691383/Consultation_Principles__1_.pdf

Annex A – List of respondents

During the 6-week consultation period there were 1,981 responses to the survey

Respondent type

Respondent type	%	Number of respondents
NET: Owns or operates premises or events	40	795
<i>Own or operate premises</i>	35	688
<i>Own or operate an event</i>	5	107
NET: Responsible for security or security consultant	17	333
<i>Responsible for security at premises or events</i>	13	259
<i>Security consultant</i>	4	74
Work at a premises or event in scope, but do not own or operate it	10	192
Interested member of the public	10	195
Other	21	416
Prefer not to say	2	36
Don't know	1	14

QA. Which of the following best describes you or your organisation? Based on all respondents (1981).

Sector which respondent/their organisation primarily operates in

Sector	%
Village hall/community centre	24
Places of worship	23
NET: Entertainment, visitor attractions and public libraries/museums/galleries	12
<i>Entertainment e.g. theatres, cinemas, and concert halls and arenas</i>	9
<i>Visitor attractions</i>	2
<i>Public libraries, museums and galleries</i>	1
NET: Retail, hospitality and nightlife	11
<i>Hospitality and nightlife e.g. bars, pubs, restaurants, cafés, nightclubs</i>	8
<i>Retail e.g. stores or shopping centres</i>	3
NET: Healthcare, public transport and public services/facilities	8
<i>Public services and facilities</i>	5
<i>Healthcare</i>	2
<i>Public transport, including train stations, ports and airports</i>	1
NET: Sports grounds and recreation/leisure	5
<i>Recreation and leisure e.g. public sports/leisure centres, ice rinks and gyms</i>	3
<i>Sports grounds</i>	2
Education and childcare	4
NET: Other sectors	10
<i>Public conference centres, exhibition halls and other venues for hire</i>	2

Terrorism (Protection of Premises) Bill - Standard Tier Consultation

<i>Hotels, holiday parks and similar holiday accommodation</i>	2
<i>Other sector</i>	6
Not applicable or don't know	2

QF. In which of the following sectors do you or your organisation primarily operate? Based on all who own, operate or are responsible for security at premises/events (1128).

Capacity of premises	% All who own or operate premises or events
Less than 100	6
100 - 299	59
300 - 499	12
500 – 799	12
800 or more	6

Region	% All respondents
South (England)	51
Midlands (England)	24
North (England)	16
Scotland	6
Wales	3
Northern Ireland	1



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This publication is available at <https://www.gov.uk/government/collections/terrorism-protection-of-premises-bill-2024>

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