



March 2026

**Martyn’s Law – Building Terrorism (Protection of Premises) Act 2025.**

The purpose of the legislation was to provide building support to control persons within designated buildings in the event of a terrorism issue or other potential problems, civil unrest and nefarious behaviours and activity where people movement may be required outside of the conventional understanding of a fire alarm evacuation.

In terms of the provision of the plan for a building or group of buildings within a perimeter, this should take into account all of the current fire and security elements, occupancy, business activities, adjacent buildings and their function, the location and demographic elements and must include reference to both the Disability and Equalities Act and also have some interaction with the freeholder/landlord especially on-site where the leaseholder has a full repairing lease or FRI (A Full Repairing and Insuring lease) where the leaseholder is not only responsible for the day-to-day maintenance of the property but also must take reasonable measures to protect it from external situations both financial and consequential.

The requirements are that whomever controls the building must be able to have “ command and control” of the movement of persons within regardless of their status and/or impairment to either evacuate, invacuate or lockdown specific elements of a site.

All of these designated sites are to be treated individually and their issues will be site specific based around both need and use, i.e. schools, colleges, entertainment, political offices etc.

The criteria for what buildings are included and which are not is somewhat fluid but, whilst the initial benchmark has been noted as buildings with occupancy over 200 this must not be seen as arbitrary nor indeed will some of the buildings currently excluded be deemed as outside of the guidance.

As a starting point, the use and occupancy of the building might take it into this conversation so outside of educational sites, which were the initial priority, it may need to include some or all of the following:

1. Hotels with VIP and high-profile visitors
2. Mosques, Synagogues, Churches and other religious sites
3. High Rise Residential sites of both high value and VIP occupancy
4. Television and Radio Studios
5. Sports Stadiums – indoor and outdoor locations
6. Animal testing and laboratory sites
7. Airports and Seaports
8. Shopping Malls
9. Music venues and Theatres
10. Local Authority offices

The use, location and occupancy of the site is critical to the overall assessment and must consider all aspects of the day-to-day use as well as other factors such as high profile media events, local and national elections and other locations where an incident might occur within some element of subterfuge to try and evade notice or obvious intent.

Not every site is going to need an electronic solution but all buildings will need a plan to move people around a building in the event of an incident to try and secure specific areas and this may not be the entire building, it may be prudent to move people to an area that can be easier to control like a school hall or sports arena, it may be the case that it is not essential or possible to control the whole building due to its size and the overall numbers of people within so quarantine and invacuation into an area rather than a full lockdown of an entire site might be more pragmatic and most importantly manageable.

There will be a need to have engagement from the emergency services as to who does what and who is in control – senior fireman or senior police officer so there is some semblance of a proposal for them in the event of an incident on-site.

The client site should therefore seek guidance from JESIP – the Joint Emergency Services Interoperability Program - <https://www.jesip.org.uk>

The JESIP program will provide overall control of a site in the event of an incident and allow the emergency services to control what happens and/or does not happen within the boundaries of the site.

Also, and just as importantly is the issue of adjacent or adjoining buildings, it may actually be the case that it is the building that is actually the target for an incident and as a result of this your building becomes part of the overall situation and may require support or indeed come under the influence or control of the JESIP program.

What is required to allow those on site to initiate an emergency protocol is going to be very site specific and will include such issues as the overall size of the site, number of buildings and overall occupancy and from that an assessment (to run alongside an existing FRA) should produce a plan as to how this becomes a plan that can be implemented.

What current security systems are in place will also be a critical element of the overall requirement and provision, what type and grade of intruder alarm does the site have (if any as not all will) if there is a system is it connected to a UPS or generator, what grade of intruder alarm is it and is it linked to the emergency services or an ARC ?.

If there is an access control program is it PC based and thus can it be controlled from a central point and linked to other systems or is it a stand-alone and doors are individually managed ?.

It is most unlikely that sites without a door control program will be able to secure areas with keys and manually lock doors as this might then risk a delayed reaction if indeed there is a fire at the same time and free egress would be a requirement.

It should not be assumed that a security situation and a fire might not occur or be part of the same incident at the same time initiated by the same person(s).

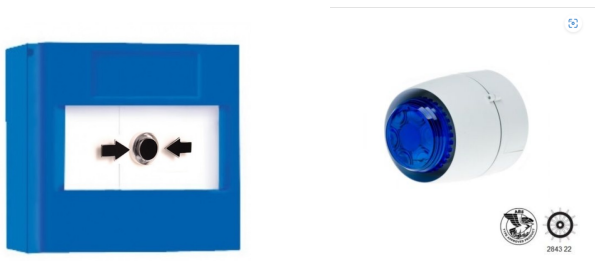
Likewise any CCTV that is on-site might need to be included in the main review especially if this too has the capability for off-site recording and monitoring to give the emergency services access to a “live feed” onto the site.

Most sites will already have some form of Fire Detection & Alarm and it may therefore be possible to modify that to accommodate some of the new equipment that this type of package will require.

Albeit that as there isn't a current standard for the Martyn's Law/Terrorism issues it will be in the main elements of existing FD&A kit that has been tweaked to meet the need, the lack of formal certification should not be considered an objectionable issue and if it works for FD&A and is certified under that program then it'll work here and can be used without the formal accreditation.

The use of a secondary system to run in parallel with any pre-existing system(s) is prickly as not only is it likely that a 2<sup>nd</sup> system may be confusing for the site and staff but also a significant cost and the initial HMG guidance is that “the provision must not be overly onerous in terms of cost provision for the building owner/management” so a totally separate system should really only be considered where all other options have been considered and exhausted as ineffective or impractical for other reasons.

For most sites that have a functional fire alarm system the ability to add additional triggers to their existing controls to allow for staff to make their appreciations of a situation and where required initiate via a blue trigger point the sounder or audio commands to alert those within the building of a situation and then for the trained staff to move those within to either a predetermined area within the site or to bring into play a pre-agreed program of lock-down/invacuate measures to try and protect those inside from whatever the threat is.



What must not be overlooked is that it is essential that the Police and Fire Brigade (via JESIP) both understand and have approved the plan so they know what will happen internally when the system is triggered and what to expect when they arrive on-site.

There should also be, within the plan, if not already provided a building “site information box” or SIB to give information to the emergency services who arrive on-site basic information as to what and where things are within the property especially if a building or site has not got a 24hr concierge or site support.

The SIB will need to have within it all of the following:

- The Terrorism Plan
- The FRA and Fire Strategy including evacuation provision
- Drawings
- Occupancy information and the Disability Support Plan
- Information as to the RP and who is in charge on-site with relevant contact information
- An overview of staff training for command and control of the site

It would not be considered appropriate to have triggers or indeed audio/visual support across an entire building as this is likely just to create panic, keeping the information regarding a situation controlled to allow for potentially covert actions to be taken to avoid a loss of control is essential.

What is most likely to be required is for the Triggers and Audio/Visual devices to be located in back of house staff areas so that any initiation of a device can be managed by those who have been trained to react.

The provision of these secondary devices in areas where Fire Alarm field devices are already in-situ would not be considered appropriate and there is a risk of accidental use of the wrong device.

Furthermore there is the issue of a fire and a security situation running concurrently so what takes priority and again how is this managed, this will need to be the main reference point in a building plan and again must be made known to both the local emergency services and the JESIP program.

It should not be discounted that the perpetrators of a criminal/terrorist event will not create a fire situation to either lure 1<sup>st</sup> responders onto site or to mask their primary intent if that is their plan so the use of any pre-existing fire alarm protection and its adequacy must also be a prima-face requirement and this may thus require a review of any pre-existing FRA and Fire Strategy Plan.

Liaison with the emergency services to allow for the control and/or movement of persons within the building is also going to be an essential part of the plan and thus, the information provided within the SIB as noted on page 3 above will need to be both regularly reviewed and updated as needed.

Where a building has issues with the provision of “disability support” then it is the responsibility of the client or RP to address both their need and its delivery NOT that of the emergency services in the first instance.

Therefore, as would have been highlighted in the FRA, the RP is responsible for the initial management of persons within the building NOT the Fire Brigade so the staff training must be of a level and of sufficient depth to ensure that where there is on-site support, be that concierge or 24hr security, that they haven sufficient training to manage the control and movement of those within the building(s) at all times 24/7 and that such training takes into account staffing issues such as holidays, sickness and other absence as well as IF the staff are not actually employed by the client site but are in fact external contractors where absence issues and induction/awareness issues will be both more frequent and complex.

The building’s assessment and that for the training provision for staff, including concierge teams if provided must be based around controlled management to take actions in areas where required, a fully comprehensive training program for staff is, as a result absolutely essential and must also include reference to and provision for temporary and agency staff (common in educational staff for cleaning and kitchen staff) and also interns and other volunteers so that overall wherever a situation develops and however entry is gained to the building the plan can be initiated quickly and effectively.

The assessment of the building and its occupants and the training element is the most important element of the plan, it must cover numbers, disability, and overall appreciation of the security issues and allow where necessary systems to work in tandem.

Therefore the primary starting point of any proposal must be what do the staff need to do and how do they get the training required (and from whom) to be able to react when there is a situation ?

Training should be the fulcrum that dictates everything else.

With on-site staff who are capable and confident within the building the use of walkie-talkies can also be considered as part of the planning process especially if the building already has a program of roving patrols by concierge or security staff.

Whilst electronics will aid the initiation and control for a site what is provided and how it gives information must not be overlooked, voice sounders whilst giving the appearance of being an easy response will be difficult to use in environments with either (or both) language issues as not everyone will have English as their 1st tongue and also some elements of impairment may be a part of this narrative.

The disability issue will be as big a question to address as anything else as some issues may not be known and others may have other consequences such as loud noises (autism and PTSD for example) so a full understanding of any Special Needs provision for all persons who use the building must be part of the planning process.

This is why I believe that the assessment needs the input of a BAFE certified risk assessor under UKAS Third Party Certification, therefore the client site will have the confidence that the author has all of the current bona-fides and credentials to assess the building and the activities within in a manner that allows for the unseen and the less obvious.

Whilst at the moment there is not a UKAS certified scheme for the provision of this work it would be generally accepted that those who were already considered competent to undertake mainstream Fire assessment work would be considered to provide this type of report and planning.

Assessments should not be undertaken by the client/RP in isolation both for the issues of accountability and liability and the overreaching issue of insurance.

In some areas it may be necessary to improve on fire door and compartment provision if a "safe area" is being created so FD30 doors may need to be increased to FD60 to provide more physical protection (not for their fire efficacy) and an overlap into whatever access control and movement issues there are in a building along with CCTV (internal and external) need to be part of that conversation.

As an aside and cross referencing fire FRA issues, the site must also ensure that external elements where there are for example, external storage in place does not increase both the risk of arson and/or the issues for a distraction fire to bring the emergency services to site and further increase risks to those 1st responders.

**In summary my view is that using exiting protection systems is the best way to provide what is likely to be needed without the end user being exposed to serious financial hardship and that a review (with the other stakeholders) for the current fire and security provision needs to be an integral part of the plan along with the most important element of training the staff how to manage a drama and that training must remain fluid and take into account changing circumstances and be reviewed at any time that there are changes to the main FRA i.e. occupancy – structure and of course a fire.**

**So in summation the assessment is a mandated legal requirement which gained Royal Ascent in April 2025, it is something that has to be planned for and implemented by mid-2027, it must take into account all of the various issues within a building or buildings, the areas adjacent and around the location, the potential for occupancy by persons with high-profile status who by such profile might bring their location into becoming a target.**

**The business activities or use of the site are also likely to make the building a potential target for nefarious or terrorist activity by others and thus an overall appreciation of the potential issues on-site is required and one issue may have consequences for another so the overall situation is something of an onion with layers and the more that are peeled away the more issues become relevant.**

**Please feel free to reach out in confidence for a free no-obligation discussion on where and how Veritas can help support your planning and delivery this new legal requirement.**

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