MARTYN'S LAW

WHAT DOES IT MEAN FOR MEMBER CHURCHES OF THE BAPTIST UNION OF SCOTLAND?

WILL YOUR CHURCH BE READY FOR THIS NEW LEGISLATION?

WHAT IS MARTYN'S LAW?

The official name is the **Terrorism (Protection of Premises) Act 2025**. It is named after Martyn Hett, who was one of the victims of the Manchester Arena terrorist bombing in 2017.

WHEN DOES MARTYN'S LAW COME INTO EFFECT?

The legislation (which applies equally to the whole United Kingdom) was passed by the UK Parliament in April 2025, but will not take effect until 2027. The long lead in period gives churches adequate opportunity to prepare for the new regulations. The time available should be put to good use. Do not leave this to the last minute! Government guidance was published in April 2026, and more detailed information will continue to be produced.

WHAT IS THE PURPOSE OF MARTYN'S LAW?

The law owes much to the campaigning of Martyn's mother, who was determined to ensure that publicly accessible premises hosting various events and activities should have a duty to protect the public, and take appropriate measures to prepare for and respond to terrorist incidents.

DOES MARTYN'S LAW APPLY TO CHURCHES?

Yes. All church buildings and other places of worship are classified as "**standard tier premises**" and therefore are potentially affected by the regulations.

ARE THERE ANY EXEMPTIONS FROM MARTYN'S LAW?

Yes. If there is a reasonable expectation that there never be more than **200 people** in attendance, then your church building is out of scope of the legislation. However:

- Do not base this on your average attendance. Think of your busiest days. Consider special events: baptisms, weddings, funerals, Christmas and Easter celebrations, concerts and other one-off gatherings. Include all staff and volunteers and anybody else dotted about the building. If in doubt, comply!
- Even if you are not currently in scope, as responsible people who love to welcome and look after guests to our services and other activities, you may want to take note of some of these principles to improve safety and incident readiness. And of course your church might increase, so advance preparation may be a declaration of faith!

WHO IS RESPONSIBLE FOR COMPLIANCE WITH MARTYN'S LAW?

The duty rests with the "**responsible person**" who has control of the premises. In the church context, this will never be one individual. If you own or have an exclusive lease of your church premises, then if your church is an unincorporated voluntary association, the responsible person will be the trustees as a collective. If your church is incorporated, either

as a Scottish Charitable Incorporated Organisation ("SCIO") or as a charitable company limited by guarantee, the responsible person will be the SCIO or company. However, the duty to ensure compliance will fall on the trustees of the incorporated entity, so there is little practical difference. Later on in this article, I will address the position where the church hires premises for worship services or other activities, but does not have general control of these premises.

WHAT DO CHURCHES HAVE TO DO TO COMPLY WITH MARTYN'S LAW?

- Notify the regulator, the **Security Industry Authority** that your church is the responsible person in respect of the premises. The Home Office has indicated that further information on how and when to notify will be provided before the law comes into force. The SIA is expected to encourage compliance and to be a supportive rather than a punitive regulator. However it will have power to apply sanctions in the event of serious non-compliance.
- Ensure that in so far as reasonably practicable appropriate public protection procedures are in place and understood by the relevant people, most likely staff and/or key volunteers. These should include the following:
    - **Evacuation**: How will you get people safely out? This may involve accessible routes for disabled people and special arrangements for children's groups.
    - **Invacuation**: How will you move people away from danger to a safer place within the premises (for example away from doors or windows if the risk is outside)?
    - **Lockdown**: How will you secure the premises to restrict or prevent entry or exit? Who locks which doors and how do you prevent people from trying to open them again?
    - **Communication**: How do you alert people quickly and give clear instructions? Who operates the PA system? Are there scripted messages ready to use? How are the emergency services contacted and by whom?

HOW MUCH MONEY WILL COMPLYING WITH MARTYN'S LAW COST THE CHURCH?

In theory, nothing, or at least very little (perhaps some signage). Government guidance indicates that the church should not need to engage consultants, purchase expensive equipment or make structural alterations to their buildings. The main cost will most likely be in time, planning, briefing and practising. The emphasis is on proportionality and preparation.

WHAT IS A PRACTICAL CHECKLIST FOR PREPARING FOR MARTYN'S LAW?

- Start early.
- Read this article and at least some of the additional guidance referred to below.
- Determine whether your church is in scope in terms of the 200 people threshold. Always err on the side of caution. It is better to over-comply than to fail to comply.

- Appoint a group to drive this forward proactively. While there may be a team leader, compliance should never depend on one person only. The church trustees must always retain responsibility and monitor this constantly.
- Write simple procedures for the public protection requirements listed above. Ensure that these are specific to your building, your activities and the people you envisage being in your premises. Do not lazily copy procedures from another church!
- Brief and train key staff and volunteers, including welcomers and leaders of children's and other activities.
- Practise what you have written to make sure that it works.
- Keep basic access and safety controls under review. Who has keys and can lock and unlock? Is our signage sufficient? Are entrances and exits observable and accessible? Ensure that new or relocated furniture or equipment is not blocking a view or a route.
- Keep this on the trustees' regular agenda (along with safeguarding, risk register etc). Minute and record what you have done. This may be helpful in evidencing compliance if questions are asked later by the SIA or others.

HOW DOES MARTYN'S LAW APPLY IF OUR CHURCH HIRES OTHER PREMISES?

You may not own or have an exclusive lease over or otherwise control the premises which you hire temporarily from week to week to hold your church services and/or other activities. Perhaps you meet in a school or community centre. In such cases the local authority or other proprietor of the premises will be the responsible person for the purposes of Martyn's Law. However, you should still stay alert. It may be that the venue proprietor has written new procedures and/or amended their hiring terms in the light of the new legislation. Engage with the venue to understand any changes to how the building will be managed and any new expectations imposed on your church. Ensure that staff, volunteers and activity leaders are informed and trained accordingly.

WHEN MIGHT ENHANCED REQUIREMENTS APPLY UNDER MARTYN'S LAW?

I will cover this very briefly as it will not be relevant to most Baptist Union of Scotland member churches:

- If your church organises an event where 800 or more people are expected to attend, and access is controlled by tickets, registration or payment, then it is likely to come under the large event category to which an enhanced tier of responsibilities apply. This would not include a non-ticketed or open access event, such as a public evangelistic event in a park, which would fall outside the scope of the new law.
- If your church operates separate premises that are not part of a place of worship, for example a conference venue, where it is likely that 800 people will be present from time to time, then this venue may be categorised as enhanced tier premises.

For details of what enhanced requirements might apply, please consult the further Home Office and ProtectUK guidance mentioned below.

WHERE CAN I FIND MORE GUIDANCE ON MARTYN'S LAW?

The Evangelical Alliance Advocacy Department has compiled an excellent factsheet for churches:
https://www.eauk.org/what-we-do/advocacy/martyns-law-fact-sheet-for-churches

Here is the full Home Office statutory guidance on the Terrorism (Protection of Premises) Act 2025, published in April 2026:
https://www.gov.uk/government/publications/the-terrorism-protection-of-premises-act-2025

The Home Office have also published more specifically targeted factsheets, including the application of the enhanced tier requirements referred to briefly above:
https://www.gov.uk/government/publications/terrorism-protection-of-premises-act-2025-factsheets

Very detailed guidance is also available on the ProtectUK website:
https://www.protectuk.police.uk/martyns-law
Within the standard tier section, there are some specific notes for places of worship:
https://www.protectuk.police.uk/martyns-law/standard-tier
There is also free e-learning on Act Awareness:
https://www.protectuk.police.uk/catalogue

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