

Martyn's Law— Scope Beyond the Hope

New Government Guidelines Provide Full Scale of Responsibility for Terrorism (Protection of Premises) Act 2025 Compliance. But Are All Retail and Hospitality Businesses Ready?

Just days after the spring edition of *Loss Prevention Magazine Europe's* interview with Figen Murray hit readers' desks in March, the Home Office published the long-awaited statutory guidance supporting the Terrorism (Protection of Premises) Act 2025—which she has campaigned so tirelessly for.

For retail, hospitality, and stadia businesses, compliance with the Act—which comes into force in less than six months—is no longer a matter of wait and see. The 129-page guidance, plus appendices, sets out what all “in scope” businesses must do to comply with the law named after Martyn Hett, the 29-year-old son of Figen Murray and one of the twenty-two victims of the Manchester Arena bombing in May 2017.

Now, with this autumn issue of *Loss Prevention Magazine Europe*, the “compliance notification portal”—the SIA's digital system for organisations to formally notify that their premises fall within scope—comes into operation, creating another key deadline for businesses.

Ready or not, Martyn's Law implementation will come into force exactly ten years after the devastating tragedy that exposed the vulnerabilities of business preparedness when it came to dealing with terrorist-related incidents.

The law, which is estimated will affect up 178,000 UK premises and venues is split into two tiers:

The Standard Tier: For venues designed to accommodate 200–799 people at any one time, focusing on low-cost procedures such as lockdown, invacuation, evacuation, staff awareness and swift communication during an attack. This covers many retail formats, from convenience stores to smaller supermarkets, although peak periods such as Christmas or Black Friday may bring some venues into scope. Premises must have public protection procedures in place.

The Enhanced Tier: For venues with capacity of 800 or more. These premises must take more detailed action to understand how terrorism could affect them, identify vulnerabilities, put public protection measures in place and formally record what they have done. This includes large retail estates, shopping centres, superstores and venues within wider retail parks.

Lack of Preparedness

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The delay in the guidelines has caused confusion, and within that communication vacuum many supplier businesses have been accused of “ambulance chasing”—fanning the flames of mis-information and mis-selling advice around costly compliance.

CT STEP™

The former National Deputy Head of Protect & Prepare, Danni Grant led national organisational learning for UK Counter Terrorism, working closely with senior Government and the Home Office. She supported officers after the Manchester bombing and the Manchester Arena Inquiry and has now turned that experience into helping retailers adapt to the published guidance.

Danni is the Director of Counter Terrorism and Protective Security at Global Consortium Group (GCG), which has recently formed a strategic partnership with Kings Secure Technologies (KST). Together, they provide an end-to-end Martyn's Law compliance solution, bringing together counter terrorism expertise, compliance technology, physical security, emergency communications and operational implementation enabling organisations to navigate every stage of their Martyn's Law journey,



Danni Grant

from initial estate scoping and risk assessment through to implementation, governance, and ongoing compliance, ahead of the spring 2027 deadline.

Danni has already worked with a number of major retailers using her CT STEP™ compliance platform in “sandbox” mode as a testbed for taking staff through the process of information sharing in a cost-effective and timely way.

CT STEP™ is a simple four-step process to help businesses achieve compliance. It focuses on well-publicised requirements—lockdowns, evacuations, invacuations and, crucially, communication with colleagues. The four steps are Understand, Evaluate, Plan, and Activate.

UNDERSTAND

Providing sector-specific terrorism information and helping organisations understand how terrorism may affect their operating environment.

EVALUATE

Structured vulnerability assessments supporting organisations to identify vulnerabilities, document reasoning, and understand where improvements may be required.

PLAN

Supporting organisations to develop proportionate public protection procedures and, where applicable, public protection measures aligned directly to the statutory guidance.

ACTIVATE

Supporting organisations to record staff awareness activity, training undertaken, communications, operational testing and exercising, creating a structured record demonstrating that plans have been communicated, understood and embedded operationally.

Standard tier user testing shows compliance can be achieved in just 60 minutes per premises. For the enhanced tier there is more to do, but compliance can still be achieved quickly.

“Martyn’s Law preparedness should be ethical, drive compliance, and written in language that someone with no terrorism background can understand and apply—it cannot be complex and acronym-heavy,” she said.

“It must provide the business with a document of truth that cuts through and informs and that staff can understand.”

“We’ve worked with national retailers and at store manager level to build our systems because it’s got to work operationally. Our platform has evolved over three years due to the feedback from operational retail; it must work in this challenging environment.”

Sarjinder Dhillon (Dhil), business development manager at KST, said: “When Danni and I speak to retailers, some are ahead of the curve, and some are absolutely nowhere near—they haven’t even started.”

“A lot of people knew it was coming into law, but they weren’t really doing much about it. Time is short and there is a lot to understand,” he said.

Danni said the guidance explains what operators must do to keep the public safe, including registering with the SIA and establishing “reasonably practicable” safety procedures. For the enhanced tier, CT STEP supports users through a systematic process to create a credible, compliant plan.



Sarjinder Dhillon

In addition, businesses are also awaiting further statutory guidance from the SIA. Danni said this “section 12” guidance will sit alongside the statutory Home Office guidance under section 27 of the Act.

Danni’s approach is to break down the guidance under the new law into bite-sized chunks to bridge the gap between the Act’s legal requirements and real-world practical implementation.

“We’ve now got the statutory guidance so that everybody can see clearly what the legislation requires. And it gives some great examples of how the legislation can be applied,” she said.

The key challenge now is for business to start to work through the guidance, and CT STEP provides the framework.

“And that’s why our collaboration with KST is so important because they bring that subject matter expertise in terms of supporting businesses across the UK with other risk management issues. Martyn’s Law expertise now becomes part of that broader solution.”

“GCG also offers a fifteen-minute terrorism awareness e-learning module to complement CT STEP’s one-hour component.”

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The full package can now be driven through KST’s QuidvisRisk management portal so compliance can be assured, tracked, and logged. The web-based platform can be embedded and adapted to existing customer systems. “It’s a time and date stamped audit trail that GCG has developed over three years in the retail sector—the process also helps them operationalise it at scale and drive it through their business,” she said.

“You’ve got less than a year, and the challenge we’re hearing now is how to drive consistency across thousands of stores. There’s a lot to do on awareness, public protection procedures and, in some cases, public protection measures. Staff awareness remains key: people must understand the plans and test that they work in practice.”

“We understand it’s all about competing priorities—but the legislation is not optional. The message is not to scare people, but to really support retailers on their compliance journey. Now it’s September, many retailers are thinking about peak Christmas trading periods. It is time to engage now.”

Peak can also be a major differentiator in terms of businesses that are in scope of the legislation.

“We’ve also found that there’s some confusion about the scope and what and where it applies,” said Dhil of KST.

“We were at the Fire Safety Event earlier this year and we had a major retailer that we’ve worked with before say to us that they’re not in scope. However, scope covers your busiest time and they were incorrect.”

“So, they may have a store which has got 450 people in it as an average, which is fine. But on New Year’s Day, they’ve got 850. They’ve got to take it as their busiest day.” There are a range of measures in order to consider capacity contained within an appendix of the statutory guidance, but working together KST and GCG can offer practical support.

Mixed Estates

“Many retailers have got a mixed estate, which is why KST and GCG go on the journey with the retailer, to scope the estate and help define their corporate position for Martyn’s Law,” said Danni.

“It’s not just about us selling them a technical solution, and leave. We can help train staff so that they can utilise the system and complete that assessment in 60-minutes, and we can then provide further consultancy or quality assurance thereafter, if required.”

Communication

Crisis communication via mass notification is a key component of Martyn’s Law. KST, with technology partner Callmy, has developed a service that enables organisations to reach key stakeholders rapidly through a web-based management portal.

Tony Watson of Callmy said: “The management portal, through which our customers manage the service, allows them to send out messages and monitor responses.”

“In the past, a mass notification service has been nice to have in terms of safety, but Martyn’s Law now means it’s become vital because a business can’t be fully compliant unless they have auditable mass communication in place,” he said.

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“The first thing we’ll do with the customer is work with their IT department to integrate the Callmy Alert service with a customer MS Entra or HR system. This allocates the end-users into message groups which are relevant to the customer’s emergency response.”

“You have to make sure the service is kept up to date because, in an emergency, you don’t want to miss anybody—whether they are an employee or contractor who needs to know what is happening and what to do.”

“Next, we need to communicate with the end-users by once again working with the IT department to

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provide them an installer package that is used to deploy our desktop “Alerter” client onto PCs throughout their estate.”

“The next time the user logs in, we recognise them through their login and launch the desktop alerting client, turning their PC into a digital notice board and public address system.”

“Staff can also receive messages via the Callmy Alert app, and for contractors there is a “carrier class” capability to message their mobile phones.”

“So, if I’m sending out to all devices, that’s pinged up on people’s desktops and apps, and the same message is going out via good old SMS. Our service is carrier class, meaning we’re sending out at a rate of 1,000 per second with a high degree of resilience,” said Tony.

“We could also ask users to acknowledge receipt of the message or respond with some details to let us know more about their situation—this information is displayed in real-time in the management portal.”

“This is important from a compliance perspective; Martyn’s Law says that you need to be able to notify people on your site of incidents, but also those near to or approaching. So, if I’m someone who’s gone to get a sandwich and walking back into the site where an incident is taking place, I know to stop and turn around.”

“From a Martyn’s Law point of view, this is critical, because if something were to happen, an SIA inspector will visit site and ask, how did you prepare for this? Who sent what to whom and when?”

The Martyn’s Law journey has, up until this point, been a blindfolded race with businesses feeling their way on what they need to do. The Government’s guidance published in April has removed the blinkers and businesses now have just months to comply.

What was once a marathon may have become a relay sprint, but cheerleader partners are out there helping to pass on or receive the baton in order to beat the clock and cross the finish line next Spring.

Helen Clayton of Solstice Risk and a former head of crime reduction for a major UK supermarket, said:

“Martyn’s Law will ultimately make communities, customers and colleagues safer.”

“One retailer I’m aware of noted that ten of the seventeen UK terrorist attacks in the last decade happened within a square mile of their stores, which is a sobering statistic and a stark reminder of the very real risks and impacts businesses must prepare for.”

“As a new organisation in the space, CT STEP brings credibility and integrity because of its deep counter-terrorism experience and a strong understanding of how organisations operate.”

“As the guidance emerges from Government, they will be able to translate emerging legislation into practical actions that businesses can realistically deliver.” ■