Martyn's Law: Don't Meet Your Partners in a Crisis

By Danielle Grant · 6 Nov 2026

There's a moment in most exercises I've run when the room goes quiet. The scenario has moved on, the first decisions have been made, and attention turns to consequence management: what happens next, and who needs to be part of it. Someone realises they need the people next door. The shopping centre control room. The landlord. The duty manager at the venue across the road. Then comes the question. Does anyone actually have their number?

Consequence management is a phrase you'll hear in plans and debriefs everywhere. It's far less often truly operationalised. On paper, it looks fine. In the room, it comes down to whether you know who to call, and whether they know who you are.

It's an old line in emergency planning, but it holds. You don't want to be swapping business cards in the middle of an incident.

Martyn's Law turns part of that lesson into a legal duty. It's also a good moment to talk about partnership more widely, including our own.

Co-ordination is a duty

Where more than one person or organisation is responsible for qualifying premises or an event, or where qualifying premises sit within other qualifying premises, responsible persons must co-ordinate with each other, so far as is reasonably practicable (paragraph 6.16). That applies to standard tier premises, enhanced tier premises and qualifying events (paragraph 7.63).

The reason is practical. Co-ordination helps make sure there are no barriers to procedures being delivered (paragraph 6.17). Where premises sit within other premises, it also helps avoid creating new dangers, such as large numbers of people being funnelled into the same space during an evacuation (paragraph 6.18).

The guidance's own example will be familiar to anyone in retail. The shops in a shopping centre and the centre itself hold a regular tenants' meeting with protective security as a standing agenda item. They set up a real-time communications channel between duty managers, and they check that shared evacuation routes could cope with several premises evacuating at once (paragraph 7.63).

None of that is expensive, but all of it depends on relationships.

Where the gap is

That's what good looks like. It isn't always what I'm seeing.

I'm working with clients right now who are trying hard to plan properly but are getting little engagement from the people responsible for the wider estate around them: landlords, managing agents, the people who run the building or the site. Emails go unanswered, meetings don't get booked, and nobody can say who would make the call on a shared evacuation route. It might be a retail park, a shared office building or a mixed-use development. Wherever several organisations share space, routes or exits, the same question comes up.

That's understandable up to a point. Commencement is still months away, and for a lot of property teams Martyn's Law isn't yet near the top of the list. But it's a clear gap, and it's a risk. A tenant can write excellent procedures for their own space. If those procedures rely on exits,

routes or announcements they don't control, though, they're only as good as the conversations they've been able to have.

The law doesn't close every part of that gap either. The duty on building owners and landlords to co-operate applies to enhanced tier premises and qualifying events (paragraph 6.21). For many standard tier tenants, it comes down to relationships rather than legal duty.

Not every useful relationship needs to be a legal duty, though. The co-ordination requirement only applies to premises within scope (paragraph 6.19). But the guidance suggests neighbouring premises could work together where applicable and practicable, including planning how they'll communicate in an emergency and running through procedures together (paragraph 6.20). It also suggests thinking about what nearby premises have in place when you design your own procedures (paragraph 7.27).

If you're not getting a reply, keep trying, and keep a note of who you approached and when. It's a record of the effort you've made, and it shows you where to escalate.

The partners inside your own door

The closest partnership most organisations have is with their own people, and it's wider than the payroll. The guidance defines staff as everyone working at the premises, including employees, contractors, volunteers and others, whether they work full time, part time, on shifts or to some other pattern. The cleaning contractor, the agency security officer and the seasonal temp all count.

That matters at this time of year. Retail and hospitality are bringing in seasonal staff for Christmas right now, and some will only be with you for a few weeks.

The people who'll carry out your procedures must be made aware of them and of their own role (paragraph 7.51). That doesn't mean memorising legislation. It means simple habits: knowing how to get people out, bring them in, lock down and pass the message on. Team briefings, inductions and a prompt card that fits in a pocket can all play their part (paragraphs 7.53 and 7.58).

It links straight back to co-ordination. A shared evacuation route only works if everyone using it knows what to do, including the newest person in the unit next door.

This week our LinkedIn carousel takes those four procedures one at a time (evacuation, invacuation, lockdown and communication) and looks at what each means for casual, part-time and seasonal staff.

Why events are different

One event can bring together an organiser, a venue, a landowner, caterers, stewards, a security contractor and a production team, sometimes for a single day.

The Act treats events differently too. Among other criteria, a qualifying event can take place on land with no buildings at all, such as a park or a field (paragraph 5.8). It's accessible to the public, 800 or more people, including staff, may be there at the same time, and there are checks on entry such as tickets, payment or membership (paragraphs 5.2, 5.17 and 5.22).

Where those criteria are met, the enhanced duties apply to the event even if the venue is normally standard tier (paragraph 5.35). The responsible person for the event is whoever controls the premises for the event, which may not be the organisation that runs them the rest

of the year. They can delegate tasks to a contracted provider, but not their legal responsibility (paragraph 6.5). And a venue that hosts events of that size from time to time, even once a year, will fall into the enhanced tier, provided it meets all the other criteria for qualifying premises (paragraph 5.36).

With that many organisations involved, often for a short time, events need specific consideration rather than being folded into a premises plan as an afterthought.

What you can do now

1. **Find out who's around you.** Your landlord, managing agent, neighbouring tenants and the venue across the road. Who's responsible for each, and how would you reach them on a busy Saturday afternoon?
2. **Get it on an agenda.** If there's already a tenants' group, a landlord meeting or a town centre forum, ask for protective security to become a standing item. It's exactly what the guidance's shopping centre example does (paragraph 7.63).
3. **Agree how you'll talk to each other.** Decide how duty managers will reach one another in real time, before anyone needs to. A group chat set up in a crisis is too late.
4. **Check what you share.** If your evacuation route ends where your neighbour's does, find out now whether it could take both at once (paragraphs 6.18 and 7.63).
5. **Look at your contracts.** If you hire out your premises, you should explain the requirements to hirers. If the SIA asks, you must be able to show you clearly specified them and took reasonable steps to make sure they were followed (paragraphs 6.14 and 6.15).
6. **Brief everyone who works there.** That includes seasonal staff and contractors. Keep it short, specific to your site and focused on their role. The guidance favours instruction tailored to the premises and procedures over a generic module (paragraph 7.56).
7. **Test it together.** A joint tabletop exercise costs little, and it'll tell you whether your plans fit together or collide. The guidance asks responsible persons to think about how procedures will be tested and practised (paragraph 7.28), and suggests neighbours run through them together (paragraph 6.20).

Choosing who you work with

Using third-party products or services isn't mandatory, and the responsible person stays liable whoever they bring in. The guidance says they should be satisfied that any support is suitable, properly resourced and effectively delivered (paragraph 6.7). That's a fair test for anyone you work with, us included.

There's also no statutory requirement for specific counter-terrorism training, learning or instruction (paragraph 7.51), and paying for third-party training isn't mandatory (paragraph 7.55). The guidance even includes an example of a village hall deciding it doesn't need a course costing thousands of pounds that claims to make attendees compliant. When nothing is mandated, the buyer has to judge.

More help is on the way. A Counter Terrorism Security Specialists Register, hosted by the Register of Security Engineers and Specialists (RSES), is intended to give organisations a way to find verified specialists. We're waiting for further detail on how it will work in practice. It sits

alongside the Act rather than within it. Until then, our advice hasn't changed: do your due diligence before you commit to anyone.

I'd look for recognised accreditation and qualifications, a commitment to keep learning as the guidance and the threat evolve, and real operational experience. Qualifications tell you someone has learned the material. Operational experience tells you they've seen what happens when plans meet reality. You want both.

I'd also be wary of two things. The first is a partnership that's really just a logo. A name on a slide doesn't tell you who'll do what when it matters. The second, and I say this as a former police officer myself, is anyone whose whole offer is a past career and half a PowerPoint presentation. A background in policing or the military can be hugely valuable, but on its own it isn't expertise in Martyn's Law. Ask what they've done since, what they've learned and whether their advice traces back to the Act and the guidance.

Stick to your swim lane

I have a simple belief about partnership. Stick to your swim lane. Know what you do well, do it properly, and find excellent people who specialise in the rest.

Our lane is Martyn's Law. That means scoping estates building by building, governance, responsible person training and CT STEP, with everything we advise tracing back to the Act and the statutory guidance. Outside that lane, we'd rather work alongside people who are the best at what they do than stretch to cover it ourselves.

So here's who we work with, and what each of them does.

Poppleston Allen bring specialist licensing law expertise. For hospitality, venues and events, the legal questions don't stop at Martyn's Law, and it matters to have lawyers who specialise in that world.

Nu-ology Training and Claire Humble, whose partnership with GCG we announced this week. Nu-ology is an SFJ Awards-approved centre delivering the CTPSaP qualification, and Claire brings recognised experience in assessing risk and supporting Martyn's Law. For enhanced tier organisations in particular, it means the qualification and the consultancy can sit side by side.

Jo Cox of Hut Six Digital built CT STEP with us. Jo has been a fundamental part of our long journey, and is now a friend as well as a partner.

Kings Secure Technologies, with Quidvis Risk, are a key channel and delivery partner, taking CT STEP to their clients.

Trellidor UK survey, design, install and service security barriers, retractable grilles and aluminium roller shutters for commercial premises, and their high-security range is certified to the LPCB LPS 1175 standards. At GCG, we don't provide physical security solutions ourselves, and there is no statutory requirement to make physical alterations or purchase equipment. However, in some circumstances, it may be reasonably practicable to do so (paragraph 7.25). Where a client reaches that conclusion, they have a specialist partner to turn to.

Helen Clayton of Solstice Risk Advisory, aligned with us through GCG, brings specialist retail expertise. Retail is a big part of our work right now, and her depth in the sector matters.

Travis Frain, our ambassador, keeps us honest. He holds us to account on ethics, standards and how we engage, which matters in a field built on the lessons of real attacks.

Where a question sits outside our lane, we won't guess at it. We'll point you to someone who's an expert in it. Between what we do ourselves and the specialists we work alongside, we can offer a complete suite of support across every element of Martyn's Law, from scoping and governance to training, qualifications, legal advice and technology.

We hold our own work to the same standard we'd ask you to apply to anyone. Our responsible person course is certified by The CPD Certification Service. Our trainers are accredited, and all have counter-terrorism experience. CT STEP builds staff training into the plan itself, and most first plans take about an hour. Behind all of it is a team with decades of experience in UK counter terrorism policing, including learning from past attacks and running national exercises.

None of it makes anyone compliant on its own. That's still the responsible person's job. But it should give them confidence that the support they're getting is the right kind.

And there's more to come. We've some exciting new partnerships to announce over the coming days and weeks, and news on events very soon.

Back to that quiet room

The exercises that stayed with me weren't the ones where everything went to plan. They were the ones where people who'd never met before walked out with each other's numbers and an agreed sense of who'd do what.

Martyn's Law exists because of lessons learned the hardest way. Most of them come down to people knowing each other before the worst day. So my question this week is a simple one. Who will you need on your worst day, and have you met them yet?

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Today, she advises organisations on Martyn's Law, protective security and practical approaches to preparedness, response and recovery.