

# Martyn's Law: Is Standard Tier Really That Simple?

Danni Grant · 28 August 2026 · Global Consortium Group

This week I escaped from my desk and once again became fully operational. Boots on the ground, which always makes me happy.

## Standard Tier is not one thing

This week has clearly reiterated that Standard Tier is not one thing.

It can mean a single premises. A retail outlet. A restaurant. One building, one occupier, one set of arrangements to get right.

Or it can mean a business with hundreds of Standard Tier locations spread right across the UK; a national retailer, a restaurant group, a hospitality chain, each site individually in scope, but needing a consistent approach across a footprint that size.

Or it can mean a single estate, ring-fenced to Standard Tier, but with complexity that has nothing to do with the tier itself and everything to do with the estate.

For this week though, I worked with a client across multiple campuses at a further education college; estate-wide, building by building.

Let me paint a picture.

Multiple campuses. Hundreds of acres between them. A vast number of buildings, some barely related to each other beyond sharing a name on a sign. Teaching blocks, sports facilities, administrative buildings, and student accommodation, sometimes owned, sometimes leased, sometimes shared with other organisations entirely.

Then you start layering in the detail.

Events. Residential blocks. Buildings used for more than one purpose, on more than one day, by more than one type of occupier.

And people. Different communities, all using the estate for different purposes.

Vulnerable students, some with physical disabilities, some receiving SEND provision.

Arrangements that need to genuinely work for everyone on site, not just the majority, whatever the scenario.

And underneath all of that, the legal and commercial considerations: who owns what, who leases what, who is actually responsible for which building, and how that responsibility changes depending on what's happening inside it on any given day.

None of that pushes the estate into Enhanced Tier. Premises by premises, it's Standard Tier.

But it is not remotely the same undertaking as a single restaurant or venue getting its procedures in order.

Same tier. Completely different job.

## **The further education position follows the building**

On paper, you might say further education is always Standard Tier. And for many premises within an estate, you'd be right.

The statutory guidance is explicit: premises used for further education that meet the Standard Tier threshold stay in the Standard Tier, even where 800 or more people could reasonably be expected on site (paragraph 4.38 of the Section 27 guidance).

But that protection follows the building, not the estate.

It only holds where a building's principal use is actually further education. A sports hall that's mainly hired out to the public, for example, doesn't inherit the FE position just because it sits inside a college estate; it gets assessed on its own use, like any other premises (paragraphs 4.17 to 4.19).

The guidance's own worked example makes the point well: a school site with a gym, a theatre and a café across separate buildings, where each one is assessed on what it is actually, wholly or mainly, used for (paragraph 4.18).

## **Why the scoping work starts now**

That's exactly why the work starts now.

Scoping an estate like this properly is a significant task in itself.

You have to assess it building by building, but you can't do that in isolation. Each individual premises assessment needs to sit within a consistent estate-wide approach. And you can't do it solely from a spreadsheet in an office either. On paper, a building can look straightforward. It's only walking it that tells you whether the label still matches the reality. This week, physically walking the estate and the buildings led to some interesting learning and insights.

In the first instance, scoping is about applying the scope criteria properly, and that's more than just capacity. It's Schedule 1 use, the principal use of each building, and applying a methodical process to work through it consistently, building by building.

Assessing buildings individually isn't pedantry. It's what catches the ones that don't fit the estate-wide assumption.

Much of a college estate has education as its principal use, and those buildings will often resolve quickly on that basis. But a sports hall hired out for public events, or a building let to an external organisation, has its own principal use, separate from the estate around it.

And some buildings within an estate like this will simply not fall within the scope of the legislation at all.

You only establish that by looking at what is actually happening in each building, rather than applying a single label at estate level.

## **Grouping and notification**

That's also what makes the next set of questions answerable.

You can't determine whether buildings should be grouped for SIA notification, or work out how many plans an estate may ultimately need, until you understand what's actually happening inside each one.

The guidance points to geographical proximity, a shared principal use, and having the same responsible person as factors relevant to a group of buildings (paragraph 4.9). None of that is a decision you can make from the estate label alone.

On notification itself, more detail has now landed.

In July, the Home Office published separate, non-statutory guidance specifically on the notification process, and it's more substantial than a tick-box exercise. It sets out that for Standard Tier premises, you have to confirm the premises meet the legal definition of qualifying premises, state the Schedule 1 use, say whether they're a group of buildings and how many, give the address of every building in that group, and provide information about how the number of people reasonably expected on site was calculated.

To be clear, that's not the same as the compliance document with rationale that Enhanced Tier premises have to prepare. That's still a section 7, Enhanced Tier-only requirement.

What Standard Tier is asked for is narrower, but it's still real substance, and none of it is answerable with confidence without the scoping work sitting underneath it.

There's also still no confirmed date for any of this. The Act can't come into force before April 2027 at the earliest, and the SIA's notification portal is still developing. The work now underway, building and testing it, is a good sign, though.

That doesn't change the argument. Whenever notification does land, it'll only be as good as the scoping work sitting underneath it.

## **Governance, oversight and consistency**

Once you've got that building-by-building picture, the governance and oversight questions become much clearer too.

Who owns the process? How are decisions recorded? How many plans does an estate like this need? One? Several? Structured by site, premises, or groups of buildings? And, crucially, how do you make sure the approach remains consistent across an estate of this scale?

The client I'm working with now has something genuinely useful: a clear plan and a consistent process they can apply across the estate, building the same core set of information wherever they look.

That consistency is the real win.

I'd say the Standard Tier requirements of public protection procedures themselves are reasonably straightforward to read. Enhanced Tier additionally carries a different level of detail for public protection measures.

But applying even the Standard Tier requirements properly and consistently across a large, varied estate takes real thought.

## **Why organisations can't wait**

This week has stretched and challenged me, with some head-scratch moments in the best possible way. The legislation and statutory guidance are my source material, and I've revisited both constantly this week. Despite my highlights and bookmarks, I continue to learn something every single day. The detail matters, and that's exactly how it should be.

It's also been a week of conversations with the people who actually run these buildings, day to day, walking the estate rather than assessing it from a screen. It happened to be enrolment week

too, with new students and their families arriving on campus, and I found myself thinking about what I, as a parent, would want a college to have in place.

Hard work. A genuinely great week. And I leave with something that matters more than having simply discussed the legislation: a clear plan and process the college can now take forward.

That's why I don't think organisations should, or can, wait. The guidance is published. The information is publicly available. For organisations with large or complex estates, the conversation can move from awareness into practical implementation planning now.

Standard Tier may be the simpler of the two tiers. That doesn't mean implementing it, across every organisation, will be simple.

There's a case study coming on exactly this work, in the weeks ahead. Don't leave it too long before you check back in.

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