OTAS LIVE

Supporting Events and Professionals at Every Stage

OTAS Insight, event safety. Article

# Martyn's Law: what to do before the regulator's guidance lands

## What event teams can do in the next 20 weeks



A large crowd walks through an open gate in a tall fence at dusk.
OTAS style image, generated from real photography. Not a record of a specific event.

**Operational** **Tactical** **Strategic**

**OTAS Insight v2.0** · 9 November 2026 · Correct as of 9 November 2026

OTAS Live Ltd.

SUMMARY

# The regulator's final guidance is still to come. Check your scope, name your responsible person and draft your procedures now.

**800**

people or more at once, staff included, can make a ticketed public event qualify [3][10]

**24**

months at least from Royal Assent before the duties start, expected in spring 2027 [2][19]

**£18m**

or 5 percent of qualifying worldwide revenue if greater, the top penalty for an enhanced tier breach [9]

**ACTION**

**Before the end of November, check each event against the qualifying event tests and write down who controls each site.**

By OTAS Insights. Edited by Kris Dailly. Correct as of 9 November 2026.




Two stewards stand at a fence behind a large crowd. OTAS style image, generated from real photography. Not a record of a specific event.

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# 01
# Read this first

Sources: 39 public sources opened on 9 November 2026. They cover the law: the Terrorism (Protection of Premises) Act 2025 and the notification regulations. They cover the Home Office: statutory and non statutory guidance, factsheets and supporting documents. They cover the regulator, the Security Industry Authority (SIA): its guidance, tools, news and consultation pages. The rest are ProtectUK pages, the MI5 threat level page, a Parliament written answer, an HSE event safety page, an inquiry report page and two trade news reports. On 9 November 2026 we checked the SIA's Martyn's Law page and its GOV.UK publications. Its final section 12 guidance, planned for autumn 2026, had not been published. The SIA published its planning tool and template the same day [25][26]. The SIA says completing them does not of itself mean anyone complies [25][26]. Martyn's Law applies in England, Wales, Scotland and Northern Ireland, with the SIA as regulator in all four [2][35]. This Insight is general information, not legal advice. Following it does not make anyone compliant.
The SIA, the regulator, assesses and enforces compliance [2][21]. We describe venues and events rather than naming them in the text. Some source links carry names.
Each fact carries its source number. Everything without a source number is OTAS guidance for event professionals.

The Terrorism (Protection of Premises) Act 2025, known as Martyn's Law, received Royal Assent on 3 April 2025. It is named in tribute to Martyn Hett, one of the 22 people killed in the 2017 attack in Manchester [2][23]. The UK threat level from terrorism has been SEVERE since 30 April 2026. That means an attack is highly likely [36]. The duties are not yet in force. The Home Office has said there will be an implementation period of at least 24 months [2][19]. The SIA, the regulator, expects the law to come into force in spring 2027 [2][19]. On 15 April 2026 the Home Office published its statutory guidance on what those in scope must do [19]. The SIA consulted on its own guidance on how it will regulate. It planned to publish the final version in autumn 2026 [6]. On 9 November 2026 it had not yet been published [4]. His mother campaigned for the law. In a trade interview on 9 November 2026, she said organisations should prepare using authoritative guidance [1]. The same day, the SIA published a planning tool for standard tier premises and a template for enhanced tier premises and qualifying events [25][26]. This Insight is about what event teams can do now, while the final guidance is still to come.

**In short:** you do not need the regulator's final guidance to start. The Home Office guidance already sets out what the law requires. Check whether each event is in scope, name the responsible person, draft your evacuation, invacuation, lockdown and communication procedures, and brief your staff. Then check it against the SIA planning tool or template now, and against the final guidance when it lands.

### Five things to take away

| | |
|---|---|
| **01** | The Home Office guidance on what you must do is out. The SIA guidance still to come is about how it will regulate. |
| **02** | A ticketed or checked public event may be a qualifying event. It is likely to be one if it is reasonable to expect 800 or more people at once at some point, staff included. Events at enhanced tier premises and excluded events are not. |
| **03** | The responsible person is whoever controls the premises for the event. You can hand out tasks, not the legal duty. |
| **04** | You do not have to buy products or training to comply. Neither the SIA nor the Home Office endorses any company. |
| **05** | Start with scope, the responsible person and four written procedures. Then check them against the SIA guidance when it lands. |

**ACTION**

Read the case, then share the actions with your team.



02

# Where things stand on 9 November

What has been published, and what has not, as of 9 November 2026. Each point carries its own source. Not legal advice.

Stewards at a barrier face a lit stage across a crowd. OTAS style image, generated from real photography. Not a record of a specific event.

## The law and the guidance

| | |
|---|---|
| **Royal Assent** | 3 April 2025. The duties are not in force until regulations bring them in [3]. |
| **Home Office guidance** | Statutory guidance under section 27, on what those in scope must do, published 15 April 2026 with supporting documents [16][17][19]. |
| **Notification rules** | The Terrorism (Protection of Premises) (Notification Requirements) Regulations 2026, SI 2026/793, were made on 9 July 2026. They set when to notify the SIA and what to give. They apply once the notification duty is in force [33]. |
| **SIA guidance** | The SIA consulted on its draft section 12 guidance, on how it will regulate, from 15 April to 12 June 2026 [5]. It received nearly 200 detailed responses and engaged over 1,800 people and organisations [6][7]. |
| **Still to come** | The final section 12 guidance and a consultation report, planned for autumn 2026 [6]. Not published as of 9 November [4]. |

## What the regulator has said

| | |
|---|---|
| **Start date** | Expected in spring 2027. The SIA will confirm the exact date ahead of time [2]. |
| **Tools** | A planning tool for standard tier premises and a template for enhanced tier premises and qualifying events, published 9 November 2026. Using them is not required. A qualifying event uses the enhanced tier template [25]. Standard tier premises will not need to send compliance documents unless asked [32]. An online scope tool is expected in the new year [8][25][26]. |
| **Inspections** | Desk based assessments and site inspections, usually with at least 72 hours written notice. With a court warrant the SIA does not need to give notice [2][21]. |
| **9 November** | The SIA published its planning tool and template, and asked for feedback before 23 December 2026 [27]. |

| | Status on 9 November 2026 |
|---|---|
| **The Act** | Passed. Duties not yet in force [3] |
| **Home Office section 27 guidance** | Published 15 April 2026 [19] |
| **SIA section 12 guidance** | Consultation closed. Final version not yet published [4][6] |
| **Notification rules** | Made 9 July 2026. Apply once the notification duty is in force [33] |
| **SIA planning tool and template** | Published 9 November 2026 [25][26] |
| **SIA scope tool** | Expected in the new year [8] |
| **Start date** | Expected spring 2027 [2] |

Table 1. Martyn's Law, what is out and what is not. SIA [2][4][6][8][25][26], Home Office [19], regulations [33]. Checked 9 November 2026.

**ACTION**

**Ask your team: which of our events next spring would be a qualifying event, and who controls the premises for each one?**

03

# Standard tier, enhanced tier and qualifying events

What each tier must do, from the Act and SIA guidance. Not legal advice.

| | Standard tier premises | Enhanced tier premises and qualifying events |
|---|---|---|
| **Who** | Premises where it is reasonable to expect 200 to 799 people at once from time to time [2] | Premises where it is reasonable to expect 800 or more people at once from time to time, and qualifying events. Places of worship, schools, childcare and further education premises stay in the standard tier whatever their size [2] |
| **Procedures** | Evacuation, invacuation, lockdown and communication [12] | The same four procedures [12] |
| **Measures** | Not required | Monitoring, movement, physical safety and security, and the security of information [13] |
| **Document** | Not required to send | Prepared, kept up to date and sent to the SIA [14] |
| **Senior individual** | Not required | Required if the responsible person is an organisation [16][29] |
| **Maximum penalty** | £10,000 [9] | £18 million or 5 percent of qualifying worldwide revenue, if greater [9] |

Table 4. What each tier must do. From the Act and SIA guidance [2][9][12][13][14]. Not legal advice.

**ACTION**

**Mark each premises and event you are responsible for with its likely tier.**

04

# Scope and tier check for events

Five questions, in order. OTAS summary of section 3 of the Act and the Home Office scope factsheet. Not legal advice.

| Question | If yes | If no |
|---|---|---|
| **1. Is the event at enhanced tier premises?** | The premises already carry the duty. Coordinate with the person responsible for them [3] | Go to question 2 |
| **2. Can members of the public attend?** | Go to question 3 | Not a qualifying event. Private events are out [3] |
| **3. Are there checks on entry, such as tickets, wristbands, passes or membership?** | Go to question 4 | Not a qualifying event. A donation, dress code or search is not a check [3] |
| **4. Is it reasonable to expect 800 or more people present at once at some point, staff included?** | Go to question 5 | Not a qualifying event, unless the premises are in scope in their own right [3][18] |
| **5. Is the event excluded under Part 2 of Schedule 2? These are events at legislatures, at transport sites with their own security plans, and at places of worship, schools, childcare and further education sites. Events in parks are not excluded.** | Not a qualifying event [3] | Likely a qualifying event. The enhanced duty applies [10][13][14] |

Table 3. Scope and tier check for events. From section 3 of the Act and the Home Office scope factsheet [3][10]. OTAS summary, not legal advice. Use the ProtectUK flowcharts and the Home Office guidance to confirm [16][20].

**ACTION**

**Run your three largest events through these five questions this week.**



05

# Why waiting is the risk

The guidance still to come is about enforcement. The work is the same either way. OTAS guidance.

Three people, two in caps, stand by a car on site. OTAS style image, generated from real photography. Not a record of a specific event.

## Four tests make an event qualifying

| 1 | 2 | 3 | 4 | 5 |
|---|---|---|---|---|
| Public can attend | Entry checks | 800 or more at once | Not at enhanced tier or excluded sites | Qualifying event |

The 800 figure includes staff, at the busiest point of the event. From section 3 of the Act and Home Office guidance [3][10]. OTAS summary, not legal advice.

### The requirements are already set

The Home Office guidance sets out what the law requires. The SIA guidance will explain how it regulates [5]. Waiting for one does not change the other. The Government says the requirements are intended to be proportionate. They can be tailored to the size, nature, layout and resources of each event [39].

### Spring is close

Many events for summer 2027 are being contracted now. Contracts decide who has control of the premises, and so who is responsible [11][16].

### Procedures take people

Written procedures only work if the staff who run them know their role. That takes briefing and practice, not a download [16].

### Buying is not complying

Neither the SIA nor the Home Office endorses any company. The guidance says you do not need to buy services or training to comply [2][16][19]. The SIA says its own tools are not a definitive checklist, and preparations will look different for every event [27].

### Fire plans are not enough

Evacuating for a fire and moving people away from an attack can need different routes and decisions. The guidance says it must be clear which is which [21]. Home Office guidance says you should consider how your measures interact with sector guidance such as the Green Guide or the Purple Guide, so they do not conflict. It also says security measures must not impede the safe entry or exit of attendees [16].

**ACTION**

**Pick the event in your 2027 calendar nearest to 800 people at once, and work out its scope this week.**

# 06

# The responsible person card

Use one card for each event. Fill it in. Keep it with your safety plan. Change it when a contract changes. It says who is in charge. It says who you work with. It says when to tell the SIA. OTAS guidance unless a source is shown.

### Who is it?

| | |
|---|---|
| **Responsible person** | Whoever will control the premises for the event [11]. This is usually the organiser who hires and controls the site [16]. |
| **Senior individual** | Needed if the responsible person is an organisation and the enhanced tier duties apply. It must be someone involved in managing or controlling that organisation, not a junior member of staff [16][29]. |
| **Not delegable** | You can give tasks to a security firm or contractor. You cannot give away the legal duty [16]. |

### Who do they work with?

| | |
|---|---|
| **Others in control** | For a qualifying event or enhanced tier premises, landowners, venue operators and others with any control must cooperate with the responsible person [24]. |
| **Other responsible persons** | Where premises sit inside other qualifying premises, those responsible must coordinate [24]. |

The duties to cooperate and to coordinate both apply so far as is reasonably practicable [24].

| | |
|---|---|
| **The regulator** | Once the duty is in force, tell the SIA within 14 days of first publicising each event. Also tell it within 14 days if you stop being responsible, or if a detail you gave changes [15][33]. |

**ACTION**

**Fill in one card for your next big event. Then go over it with your team. Keep a copy on site.**

# 07

# The four procedures

Every event in scope needs these, so far as is reasonably practicable [12]. You do not need a separate plan for every type of attack. The SIA notes that if a threat seems to be inside, evacuation may suit better, and if it seems to be outside, lockdown may suit better. Staff may need to act before they have full information [25]. The examples are OTAS guidance for events.

### Evacuation

- Getting people away from danger by moving them out of the event or part of it [2].
- For events, think about which exits lead away from the threat, not just the nearest.

### Invacuation

- Moving people to a safer place within the event [2].
- For outdoor events, list the structures that can take people in, and how many.

### Lockdown

- Securing the event to stop people entering or leaving [2].
- For a fenced site, know who closes which entry gates, how fast, and how exits stay staffed so people can still be moved away from danger. OTAS guidance [31].
- The immediate vicinity has no fixed distance. You do not have to put procedures or measures in place in areas you do not control, but you should think about how yours would work if an attack happened there, for example in the queue outside [25].

### Communication

- Making sure information reaches people at the event [2].
- Agree the words for staff and the public, and how you reach the queues outside [16].
- For a suspicious item, staff do not touch it and move at least 15 metres away before they use a radio or phone [30].
- Keep people back: at least 100 metres from a bag sized item, 200 metres from a car or large item, and 400 metres from a larger vehicle [30]. Follow police and supervisor directions.
- These distances are ProtectUK police guidance, not law [30].

**ACTION**

**Write one sentence for each procedure at your next event, then brief it.**

# 08
# What to do at each level

## Operational

**Know the procedures**

**Report concerns**

**Free awareness course**

Know the four procedures and your role in each. Know how to report something suspicious, and do the free awareness course [22].

## Tactical

**Draft procedures**

**Include the queues**

**Brief and test**

Draft the procedures for your area, including queues and the space outside. Brief your teams on their roles and test the procedures with them.

## Strategic

**Check scope**

**Name the person**

**Prepare the document**

Check scope for every event and name the responsible person. For qualifying events, if it is an organisation, name the senior individual too [29]. Fix who has control in your contracts.
For qualifying events, prepare the document for the SIA.

**ACTION**

**Pick one action at your level and do it before the end of November.**

# 09
# What we do not know yet

- When the SIA's final section 12 guidance and consultation report will be published. It was planned for autumn 2026 [6].
- The exact date the duties come into force. Spring 2027 is expected [2].
- How the SIA's notification portal will work in practice. The timings and the information needed are already set by regulations made in July 2026 [33][34].
- Whether the SIA will change its planning tool and template after feedback. It has asked for feedback before 23 December 2026 [27].

**ACTION**

**We will update this Insight when the SIA publishes its final guidance or confirms the start date.**

10

# Coming up: the final guidance and the start date

The SIA has said it will publish its final section 12 guidance and a consultation report [6]. It published its planning tool and template on 9 November 2026 [25][26]. A scope tool and a notification portal are to follow [2][8]. On 9 November 2026 the SIA said it was about to test its new digital service with users. It had lined up over 30 more premises and events for pilot inspections [27]. The SIA is asking for volunteers from one off events of all sizes to help test its tools and services [27]. Each step is a moment to check your plan, not to start it.

**ACTION**

**If you need support getting your events ready for Martyn's Law, reach out to us to see how we can support you.**

## Questions

### Do we have to comply now?

No. The duties are not in force until regulations bring them in, expected in spring 2027 [2][3]. You can prepare now using the Home Office guidance.

### When do we tell the SIA about an event?

Once the duty is in force, within the 14 days beginning with the day you first publicise the event date. If the date was first publicised on or before the day the duty starts, notify within the 14 days beginning with that day. Events held before the duty starts are not notified. Someone you authorise can submit, but the legal responsibility stays with you [33][34].

### Is a free event in scope?

It can be, if three things are true. The public can attend. There is a specific check on entry, such as wristbands or QR codes. It is reasonable to expect 800 or more people at once at some point, staff included. Then it is likely to be a qualifying event, unless it is at enhanced tier premises or is an excluded event [3][10][28].

### Who is the responsible person for an event in a park?

Whoever has control of the area for the event. If an event company hires and controls it, that is the company. If the council keeps control, it is the council [16].

### Do we need to buy training or a product?

No. There is no requirement to buy services or training, and neither the SIA nor the Home Office endorses any company [2][16]. Staff must know the procedures and their role [16]. Free modules are on ProtectUK and the NPSA site, including ACT Awareness, aimed mainly at staff working in venues and public spaces [22][27]. The Home Office guidance points CCTV operators to the NPSA See, Check and Notify training, where available [16].

### Does Martyn's Law mean we must cancel a community event or fireworks display?

No. The SIA says not every public gathering or fireworks display will be a qualifying event. Many traditional Christmas markets may not meet the test because they do not control entry. It says the law does not require organisers to employ expensive security staff, buy new technology or hire specialist consultants. Check your scope first [27]. The SIA has also said Martyn's Law is not about stopping events from happening [37].

### Will the SIA inspect us?

It may. It will use desk based assessments and inspections, usually with at least 72 hours written notice, and no fees. With a court warrant the SIA does not need to give notice [2][21].

### Has the SIA published its final guidance?

Not as of 9 November 2026. It planned to publish in autumn 2026 [4][6]. We will update this Insight when it does.

> **If your biggest event next summer were inspected tomorrow, who in your team would answer for it?**

**ACTION**

**Send us your question and we will add the answer to the next update.**

# Sources

Web sources opened 9 November 2026 and labelled by source type. Links are for checking only. Listing a source does not mean it endorses OTAS or has worked with OTAS.


1. **Trade news interview on preparing for Martyn's Law, Emergency Services Times, 9 November 2026** emergencyservicestimes.com
2. **SIA, Understanding Martyn's Law and the SIA's role as regulator, 17 July 2026** gov.uk
3. **Home Office, Terrorism (Protection of Premises) Act 2025 factsheet, scope (events), updated 24 July 2026** gov.uk
4. **SIA, Martyn's Law and the SIA's role as regulator, collection page, last updated 9 November 2026** gov.uk

5. **SIA, Martyn's Law draft section 12 statutory guidance, consultation page** gov.uk
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7. **Counter Terror Business, SIA's Martyn's Law consultation closes, 18 June 2026** counterterrorbusiness.com
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11. **Terrorism (Protection of Premises) Act 2025, section 4, persons responsible** legislation.gov.uk
12. **Terrorism (Protection of Premises) Act 2025, section 5, public protection procedures** legislation.gov.uk
13. **Terrorism (Protection of Premises) Act 2025, section 6, public protection measures** legislation.gov.uk
14. **Terrorism (Protection of Premises) Act 2025, section 7, documenting compliance** legislation.gov.uk
15. **Terrorism (Protection of Premises) Act 2025, section 9, notification requirements** legislation.gov.uk
16. **Home Office, Terrorism (Protection of Premises) Act 2025 statutory guidance (accessible)** gov.uk
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18. **Home Office, supplementary document A, methods for assessing the number of people present, updated 25 August 2026** gov.uk
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22. **ProtectUK, ACT Awareness e-learning** protectuk.police.uk
23. **Manchester Arena Inquiry, Volume 1, Security for the Arena, GOV.UK page** gov.uk
24. **Terrorism (Protection of Premises) Act 2025, section 8, requirements to coordinate and cooperate** legislation.gov.uk
25. **SIA, Martyn's Law: enhanced tier template, 9 November 2026** gov.uk
26. **SIA, Martyn's Law: standard tier planning tool, 9 November 2026** gov.uk
27. **SIA, Martyn's Law: working together to prepare, 9 November 2026** gov.uk
28. **Terrorism (Protection of Premises) Act 2025, Schedule 2, excluded premises and events** legislation.gov.uk
29. **Terrorism (Protection of Premises) Act 2025, section 10, senior individual** legislation.gov.uk
30. **ProtectUK, unattended and suspicious items** protectuk.police.uk
31. **HSE, event safety, incidents and emergencies** hse.gov.uk
32. **SIA, New tools to support preparation for Martyn's Law, 9 November 2026** gov.uk

33. **The Terrorism (Protection of Premises) (Notification Requirements) Regulations 2026, SI 2026/793** legislation.gov.uk
34. **Home Office, Terrorism (Protection of Premises) Act 2025: notification requirement, 14 July 2026** gov.uk
35. **Terrorism (Protection of Premises) Act 2025, section 36, extent** legislation.gov.uk
36. **MI5, Terrorism threat levels** mi5.gov.uk
37. **SIA, Martyn's Law: keeping up the momentum, 5 August 2026** gov.uk
38. **ProtectUK, Martyn's Law resources, 27 August 2026** protectuk.police.uk
39. **UK Parliament written answer 34237, 19 October 2026** questions-statements.parliament.uk

## Related OTAS Insights

These are links to other OTAS Insights pieces, not to any OTAS Live product or service.

**Evacuating a venue late at night**
**When everyone is told to come in at once**

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Guidance: this Insight summarises the Terrorism (Protection of Premises) Act 2025, Home Office statutory guidance and SIA guidance as published on 9 November 2026. It is not legal advice, and following it does not mean premises or an event comply. The SIA assesses and enforces compliance. Read the Home Office guidance and the SIA guidance, and take legal advice where you need it.

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Events industry since 2008, internationally since 2015.

OTAS Live Ltd.

By OTAS Insights. Edited by Kris Dailly.

Images are OTAS style images, generated from real photography. None is a record of a specific event.

**ACTION**

**Check the sources before you quote them, and tell us if any link has changed.**

OVER TO YOU

# If your biggest event next summer were inspected tomorrow, who in your team would answer for it?

If you need support getting your events ready for Martyn's Law, reach out to us to see how we can support you.

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