

Guideline Leaflet PC15: The Terrorism (Protection of Premises) Act 2025 and Protective Security for Baptist Churches

This leaflet contains Information about The Terrorism (Protection of Premises) Act 2025 (also known as Martyn's Law). It also encourages all churches to consider their vulnerability to terrorist attack and how they would respond in the event of such an attack.

This Guideline Leaflet is regularly reviewed and updated. To ensure that you are using the most up to date version, please download the leaflet from the BUGB website at www.baptist.org.uk/resources

The date on which the leaflet was last updated can be found on the download page.

PC15: The Terrorism (Protection of Premises) Act 2025 and Protective Security for Baptist Churches

These notes are offered as guidelines by the Legal and Operations Team to provide information for Baptist churches.

The legal services undertaken by the Legal & Operations Team of the Baptist Union of Great Britain are carried out and/or supervised by a Solicitor who is authorised and regulated by the Solicitors Regulation Authority. Regulatory Information is available here:

[L17 Legal and Operations Team – Regulatory Information](#)

These notes can never be a substitute for detailed professional advice if there are serious and specific problems, but we hope you will find them helpful.

If you want to ask questions about the leaflets and one of the Baptist Trust Companies are your Holding Trustees, you should contact them. They will do their best to help.

If your church property is in the name of private individuals who act as trustees they may also be able to help.

BACKGROUND

The Terrorism (Protection of Premises) Act 2025 ('the Act'), otherwise known as Martyn's law, is intended to improve protective security and the preparedness of organisations by imposing a legal obligation upon those responsible for certain premises and events to consider the risk of terrorism and how they would respond to an attack.

The aim of this leaflet is not to unnecessarily scare churches but to inform affected churches about forthcoming legal obligations and to suggest that all churches may wish to consider protective security now (if they have not already done so) - whether or not they will be affected by the Act.

THE TERRORISM (PROTECTION OF PREMISES) ACT 2025 IS NOT CURRENTLY IN FORCE (BUT THAT DOES NOT MEAN THAT PROTECTIVE SECURITY SHOULD BE IGNORED)

The Act received royal assent on 3 April 2025 but the Act is not expected to be in force until April 2027. This is so that regulations can be made and the framework in which the Act is expected to operate can be put into place. Until the Act is in force, it will not create any legal obligations upon churches.

We will be monitoring the situation and updating this leaflet to issue comprehensive guidance when there is more information to base this upon.

Currently, we cannot tell a church how to be 'Martyn's Law compliant'. This is because neither we, nor anyone else, knows what that means yet. Therefore, we would say that anyone now promising to tell churches how to be 'Martyn's Law compliant', especially in return for a fee, should be regarded with a degree of scepticism.

Even though the Act is not yet in force, affected churches may wish to consider preparing for the time when it will be. Such preparations may include the church informing itself about the known requirements of the Act, the church informing itself about protective security generally and (if it was thought proportionate and reasonable) the church anticipating the forthcoming legal requirements by undertaking risk assessments and adopting appropriate procedures now.

WHEN THE ACT IS IN FORCE, NOT ALL CHURCHES WILL BE AFFECTED BY IT

Church premises where it is not reasonable to expect that from time to time 200 or more individuals may be present at the same time will be exempt from the requirements of the Act. Consequently, many smaller Baptist chapels will not be affected by the Act at all.

That does not mean however, that protective security is not important for those churches. Every church, even those not affected by the Act, may wish to consider its own circumstances to assess whether they might be at risk and what reasonable and proportionate steps (if any) might be appropriate to mitigate that risk. Please see below for further information.

REQUIREMENTS FOR CHURCHES THAT WILL BE AFFECTED BY THE ACT WHEN IT COMES INTO FORCE

Church Premises

If it is reasonable to expect that from time to time 200 persons or more may be present at the same time at a church in connection with communal worship/religious practices (or other specified uses including entertainment and leisure) then the church premises will be what the Act calls "standard duty premises".

The standard duty will include a duty, so far as is reasonably practicable, to ensure that appropriate procedures are in place in case of an actual or imminent terrorist attack.

Our understanding is that the measures are likely to be simple and low cost and they will relate to improving the preparedness and the response of church staff and volunteers. The church will have to, as far as is reasonably practical, ensure the public protection procedures are in place to reduce harm to individuals if an attack occurs at the premises or nearby. These procedures will need to be ready to be followed if there is reason to suspect an attack is occurring or about to occur at the premises or nearby. Such procedures could include:

- Evacuation - moving people safely away from the property;
- Invacuation - moving to a safe (or safer) place inside the building;
- Lockdown - making the premises secure so that people are prevented from entering or leaving; and
- Communication - alerting people to the danger.

Church staff and volunteers will need to be aware of these procedures.

The church will also, when the Act is in force, need to appoint a 'responsible person' to oversee the public protection procedures and take responsibility for them as well as registering that person with the new regulator, the Security Industry Authority.

There should be no legal requirement for the church to undertake physical alterations to the premises. However, if as part of a church's own risk assessment, it was considered that such alterations, eg lighting, gates, perimeter fencing or access control systems, were desirable, churches should obtain property trustee consent where the works would require planning permission or building regulations consent. For more information, please see:

https://www.baptist.org.uk/Articles/368770/Guideline_Leaflet_PC04.aspx

Changes to a listed building will require listed buildings consent so the church would need to contact our Church Heritage Support Officer, Katie Wylie at listedbuildings@baptist.org.uk .

Events held on Premises other than the Church Premises

Events held at premises other than the church premises could potentially be subject to the requirements of Martyn's Law.

It is understood, however, that events held by churches at parks and recreation grounds will be generally excluded from the application of the Act unless people are employed or engaged to secure the area of the event or to check that members of the public who wish to access the event have, for example, paid to do so or that they have invitations, tickets or other passes that would allow them entry.

When the Act is in force, churches holding events away from church premises at which a large number of persons are expected can seek advice from us by e mailing: legal.ops@baptist.org.uk

GENERAL PROTECTIVE SECURITY CONSIDERATIONS ARE APPLICABLE NOW

Even though the Act is not currently binding, this does not mean that churches should ignore issues of protective security until the Act comes into force.

Similarly, churches that, because of their size, would not be affected by the Act should not think that protective security is not relevant to them.

We are currently signposting churches to the official Protect UK website. It can be found here: <https://www.protectuk.police.uk/> . The site contains useful information and general guidance about protective security. The website is intended for all types of organisations, not just places of worship and so, inevitably, some of the content may not be relevant to a church. We would, nevertheless, encourage churches to explore the Protect UK website to see if there is any content that might be of value to them.

The pages of the ProtectUK website relating to Martyn's Law and the 'Standard Tier' will be of particular relevance to churches that will be affected in due course. Please see the link below:

<https://www.protectuk.police.uk/martyns-law>

We recommend that every church should, if they have not already done so, consider its own circumstances and its risk profile in relation to potential acts of terrorism. (The ProtectUK website goes into more detail about the various types of potential terrorist attack). We are recommending that a church takes into account its size, location, and all other relevant factors to consider whether taking some action, for example, adopting a contingency plan, might be appropriate. We are recommending a common sense approach to this - the needs of large Baptist church in the centre of an urban area might be quite different to that of a small Baptist church in a remote rural location.

Any plans or procedures that are adopted should be reviewed periodically to make sure that they are still appropriate.

FURTHER GOVERNMENT INFORMATION

Further information from the UK Government about the Act generally can be found here:

<https://homeofficemedia.blog.gov.uk/2025/04/03/martyns-law-factsheet/>

The Government has published official statutory guidance which can be found here:

<https://www.gov.uk/government/publications/the-terrorism-protection-of-premises-act-2025>

The statutory guidance is very detailed and, of course, not all of it will be relevant to places of worship. At the same webpage, churches can also find non-statutory guidance to assist them in calculating the number of individuals that can be reasonably expected to be present at their premises. There is also a document of illustrative examples (including some examples relating to religious activity held at premises other than a place of worship). The link also has a document about useful further resources and training. Churches are encouraged to read this.

Association Trust Company	Contact
Baptist Union Corporation Ltd East Midland Baptist Trust Company Ltd	Baptist Union Corporation Ltd Baptist House PO Box 44 129 Broadway Didcot Oxfordshire OX11 8RT Telephone: 01235 517700
Heart of England Baptist Association	Heart of England Baptist Association 480 Chester Road Sutton Coldfield B73 5BP Office Mobile: 0730 505 1770
London Baptist Property Board	London Baptist Association Unit C2 15 Dock Street London E1 8JN Telephone: 020 7692 5592
Yorkshire Baptist Association	17-19 York Place Leeds LS1 2EZ Telephone: 0113 278 4954
West of England Baptist Trust Company Ltd	West of England Baptist Trust Company Ltd Little Stoke Baptist Church Kingsway Little Stoke Bristol BS34 6JW Telephone: 0117 965 8828

This is one of a series of *Guidelines* that are offered as a resource for Baptist ministers and churches. They have been prepared by the Legal and Operations Team and are, of necessity, intended only to give very general advice in relation to the topics covered. These guidelines should not be relied upon as a substitute for obtaining specific and more detailed advice in relation to a particular matter.

The staff in the Legal and Operations Team at Baptist House (or your regional Trust Company) will be very pleased to answer your queries and help in any way possible. It helps us to respond as efficiently as possible to the many churches in trust with us if you write to us and set out your enquiry as simply as possible.

The Legal and Operations Team also support churches that are in trust with the East Midland Baptist Trust Company Limited.

If your holding trustees are one of the other Baptist Trust Corporations you must contact your own Trust Corporation for further advice. A list of contact details is provided above. If you have private trustees they too should be consulted as appropriate.

Contact Address and Registered Office:

Support Services Team, Baptist Union of Great Britain, Baptist House, PO Box 44,
129 Broadway, Didcot OX11 8RT
Tel: 01235 517700 Fax: 01235 517715 Email: legal.ops@baptist.org.uk
Website: www.baptist.org.uk Registered CIO with Charity Number: 1181392

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