From the Director of Health Estates
Philip McClay

Department of Health
An Roinn Sláinte
Männystrie O Poustie
www.health-ni.gov.uk

BY EMAIL
To: Chief Executives HSC Trusts

For info:
HSC Trusts Heads of Estates

Sustainability, Engineering and Estate Safety
Resources & Corporate Management Group
Health Estates Directorate
Castle Buildings, Belfast BT4 3SQ
Northern Ireland

Tel: 028 90523775
Email: david.wilson@health-ni.gov.uk

Reference: PEL (26) 03
Related Document
Date: 26 October 2026

Dear Colleagues,

Terrorism (Protection of Premises) Act 2025

Summary

The purpose of this letter is to notify HSC Trust organisations of the publication of the **Terrorism Act (Protection of Premises) 2025**, commonly known as Martyn's Law, which gained Royal assent on 3rd April 2025.

This Act will come fully into force on 2nd April 2027 unless the Government extends the implementation period.

Action

Chief Executives of HSC Trusts are asked to:

- Disseminate this letter to relevant staff including Estates, Security Management, Facilities Management, Governance and Risk Management teams.
- Undertake a review of their estate to determine whether any of your premises may fall within scope of the Act.
- Identify appropriate Responsible Persons for qualifying premises and establish working groups as required to undertake compliance assessments against the Act for qualifying premises.
- Develop action plans for necessary work to support compliance ahead of commencement of the Act in April 2027.

Background

The Terrorism (Protection of Premises) Act 2025 received Royal Assent on 3 April 2025. The legislation establishes a new framework intended to strengthen protective security and preparedness against terrorist attacks in publicly accessible premises.

The Act aims to improve operational preparedness and protective security across the UK for certain premises (including those providing healthcare services). In addition, certain larger premises are required to consider their vulnerability to acts of violence and, where appropriate, take steps to reduce those vulnerabilities.

Healthcare is identified as a qualifying use under Schedule 1 of the Act. Consequently, healthcare premises across Northern Ireland may fall within scope depending on their use, configuration and anticipated occupancy levels.

The Home Office statutory guidance and associated supporting documents can be accessed via the hyperlink: - Statutory Guidance: Home Office - Terrorism (Protection of Premises) Act 2025. HSC organisations are encouraged to familiarise themselves with this guidance during the implementation period.

The Security Industry Authority (SIA) has been designated as the regulator for this Act and is currently developing its regulatory framework. Whilst there is presently no legal requirement to comply with the Act, organisations are encouraged to utilise the implementation period to assess their readiness and prepare for future compliance obligations.

The Act adopts a two-tier approach based on the number of individuals reasonably expected to be present:

- **Standard Duty Premises:** 200 to 799 individuals.
- **Enhanced Duty Premises:** 800 or more individuals.

Premises where less than 200 individuals would reasonably be expected to be present do not fall within the terms of the Act. A decision tree to aid assessment is provided in Figure 1.

Premises falling within the Standard Duty tier are required to establish procedures to reduce the risk of physical harm arising from a terrorist incident. These procedures include evacuation, invacuation, lockdown and communication arrangements.

Enhanced Duty premises are subject to additional requirements, including the implementation and maintenance of appropriate public protection measures, enhanced governance arrangements and documented compliance records.

Further guidance and resources are available from: -

- Police Service of Northern Ireland (PSNI) counter-terrorism team,
- ProtectUK
- National Protective Security Authority

Should you have any queries regarding the content of this letter please contact: -

Mr Joe Forde
Health Estates Directorate
Resources & Corporate Management Group
Health Estates Directorate
Tel: 028 9081 6096
Email: joe.forde@health-ni.gov.uk

Yours sincerely



Philip McClay
Director Health Estates

cc
Chris Matthews, Corporate and Resource Management Group
David Wilson, Health Estates
Mark Wilson, Health Estates
Peter Cross Health Estates

Figure 1: Decision tree to determine whether premises are in scope of the standard tier, in scope of the enhanced tier, or out of scope of the Act Key

