

NABMA
the voice of markets

ANTI-TERRORISM MEASURES FOR MARKETS

The Terrorism (Protection of Premises) Act 2025
What market managers need to do



Introduction

Terrorism affecting markets is rare but the potential for terrorists to target markets is significant because of the large numbers of people upon the premises.

Terrorists want to cause death, injury, damage and disruption to as many people as possible to pursue their aims and highlight their causes.

The London Bridge/Borough Market terror incident of 2017 and several vehicular attacks upon continental Christmas markets over recent years shows the potential for similar events at UK traditional markets.

The Terrorism (Protection of Premises) Act 2025 requires owners of various premises to take responsibility for implementing measures to mitigate potential terrorist acts.

The Act is often referred to as “Martyn’s Law” (named after one of the victims of the bombing of Manchester Arena in 2017).

The Act was granted Royal Assent on 3rd April 2025 and is expected to come into force in 2027, thereby giving time for responsible persons to make and notify appropriate security arrangements.



Who

- Market managers need to be aware of - and understand - the Act to bring attention to market owners and all involved of its requirements and to report, prepare and implement appropriate measures.
- Market managers have to take responsibility for their markets security arrangements.
- Councils will/may have a number of public buildings and have arranged public events that will require security measures. Your line manager/director/Chief Executive/Town Clerk/Emergency Planning Officer/H&SAW officer may have a corporate approach to ensure compliance with the Act.
- The Home Office will publish statutory guidance during the 24 month implementation period.
- Your assessment of what measures are required should be reported to your line manager.
- Hostile vehicle mitigation may be particularly beneficial for open markets, street markets, Christmas and other event markets. Barriers, rising bollards etc may be the responsibility of other council departments, such as Highways or Town Centre Management – but ensure that you are involved in protecting your market as part of council arrangements.
- There is a need to discuss intended measures with the local police anti-terrorism specialist and to formally report to the Security Industry Authority (SIA) to be certain that the measures you are implementing are appropriate and registered.
- The SIA as an enforcement authority will have strong compliance notice powers - including closure notices and fines/imprisonment.
- Ensure that you are linked to Protect UK information to obtain suitable training for you and your staff.
- You should annually review the measures.

What

- Not all markets “qualify” for necessary measures to be taken and if you have any queries about whether your market is caught by the new legislation please contact NABMA.
- Stand-alone open markets do not qualify as they are not ticketed events. However, if you consider it appropriate you can/should voluntarily implement security measures.
- Market Halls do qualify for measures to be put in place if there are over 200 people in the market at any one time.
- Open markets situated alongside market halls do qualify – if there are over 200 people in the market at any one time.
- Market Halls with 800+ people on the premise at any one time are classed as requiring **enhanced measures** to be put in place. Those with less than 800 are classed as “**standard duty**” premises.
- Clearly there is a strong perception that there is a greater risk for larger markets than for smaller markets and an appreciation that human and financial resources will be proportionate to size.
 - » Example 1 - Recognising how important communication will be needed for evacuation/invacuation actioning PA systems are recommended for all markets. In smaller markets loudhailer systems might be sufficient whereas large markets are likely to need full PA announcement systems in place.
 - » Example 2 – Staff training is necessary, but more so for large indoor markets where lockdown/evacuation etc actions are needed.
- At the present time we are awaiting further Home Office advice but it can be anticipated that prominent city markets and large event markets are more likely targets. However, all markets operators need to anticipate/train for terrorism incidents even if the market is not caught by the statutory requirements.
- Home office guidance and council lead officers should assist you in clarifying issues as we approach the implementation of the legislation and NABMA will issue further guidance in due course.
- NABMA members are requested to update NABMA on their planned measures and how the SIA provides feedback on acceptability. This will assist in updating this and other guidance/advisory documents.

When

- Appropriate security measures should be considered now so that these are in place when the implementation date is set by Government. That date is likely to be in 2027.

How

- Procedures, systems and staff training will need to be in place.
- Adequacy of staff numbers and types to cope with operational responsibility.
- Market Hall trader information and training for staff support.
- Evacuation systems.
- Invacuation systems.
- Lock down systems.
- Hostile vehicle mitigation.
- Communication methods.

Notes

NABMA members have access to helpful documents on the “members only” website pages. These documents are specific to individual markets but are good guidance to assist in different market situations as a starting point.

- Emergency Action Plan & Evacuation Procedure
- Bomb Threats/Suspicious Packages
- Evacuation, invacuation, lockdown, protected spaces (since updated by ProtectUK)
- NABMA intends further operational guidance in the future.

This guidance is provided to members on the basis of information currently available (August 2025).

Links

<https://www.protectuk.police.uk>

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

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Contact Us.



01691 680713



info@nabma.com



The Guildhall, Oswestry,
Shropshire. SY11 1PZ

