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Martyn's Law in Football: The implications for non-league clubs

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Introduction

This guide is intended for football clubs across both the professional and semi-professional games. It brings together two complementary perspectives on Martyn's Law and its likely impact for club owners, directors and officials.

TLT LLP's contribution explains the legal framework, duties and compliance requirements that apply across professional and semi-professional football.

Football Pyramid Partnership's contribution then focuses specifically on the non-league game, examining how those requirements may translate into the operational realities of National League System clubs, including attendance patterns, volunteer-led delivery, match day staffing and practical readiness.



Martyn's Law and football clubs

Obligations on club owners and practical guidance on compliance

By Rebecca Lowe and Piers Warne, TLT LLP

What is Martyn's Law?

Martyn's Law is the name given to The Terrorism (Protection of Premises) Act 2025.

It requires those responsible for a wide variety of publicly accessible venues, including football grounds/stadia, to 'take steps to mitigate the impact of a terrorist attack and reduce harm in the event of a terrorist attack occurring' and, in some circumstances, 'to reduce their vulnerability to terrorist attacks'.

Why has Martyn's Law been introduced?

The legislation follows campaigning by Figen Murray, whose son Martyn Hett died in the 2017 Manchester Arena terrorist attack. An in-depth public inquiry found that organisational unpreparedness and gaps in public safety measures contributed to the deaths of 22 people at the arena.

What does the legislation say?

The legislation provides that a premises is 'qualifying' (in scope) if:

1. It is a building or part of a building (with or without other land) – football grounds/stadia are considered within scope unless they are publicly accessible with no access controls and no spectator accommodation;
2. It is used wholly or mainly for a use specified within the Act – sports grounds being one such use (with the exception of sports grounds not designated as such under the Safety of Sports Grounds Act 1975);
3. It is reasonable to expect that from time to time 200 or more individuals may be present on the premises at the same time.

Relevant 'tiers'

Any premises which reasonably expects to have 200 – 799 individuals present at the same time will fall into the 'standard tier'. Any premises in respect of which that number is 800 or more will fall into the 'enhanced tier'.

The test is whether that threshold is met 'from time to time', even if only 'occasionally'. By way of example therefore, if a local derby attracts over 800 persons every year, the premises will likely be in the enhanced tier.

Clubs with larger sites, or separate public-facing facilities may need to consider multiple registrations for club houses, stands, sports centres or hotels, for example, especially where independently managed.

The legislation also makes provision for 'qualifying events', defined as events with a capacity of more than 799 people, that are accessible to the public, and in respect of which there are explicit entry conditions (e.g. tickets, passes or membership).

The situation is complicated when looking at premises ordinarily in the standard tier that host a one-off event with more than 800 attendees. The enhanced duty requirements will apply to any qualifying event which is held on the premises. Outside the context of the one-off qualifying event, the premises may remain in the standard tier, depending on factors such as primary use of the premises, regularity of events and who has overall control of any events. Small clubs that host a cup match that takes them over their usual attendance threshold, or where they rent their ground to a third party on a one-off occasion for a large event will need to consider whether they need to register the premises or the event.

Responsible persons

Where a premises falls within either tier, or where a qualifying event takes place, a responsible person (or persons) must be identified. This is the 'individual, organisation or company' that has control over the premises for the purposes of its use as a sports ground or for the purpose of any qualifying event. If more than one person has that level of control, the law requires them to act jointly.

Home Office Guidance envisages, where possible, a corporate body that meets the control criteria will register as the responsible person. In the enhanced tier, where the responsible person is an organisation or company, the Act 'requires that the responsible person must designate a senior individual to ensure that' it complies with the obligations placed upon it.

For clubs that lease their ground from a local authority or private landlord, there may be a joint responsibility or a duty to co-operate, depending upon what the specific arrangements are in terms of how the land is occupied.

Guidance is also provided in respect of situations where premises abut land owned by a third party and where there might therefore be a need to co-operate to ensure that appropriate measures are put in place.

Duty to register/production of documentation

The responsible person(s) must:

- Notify the Security Industry Authority ('SIA') (the regulatory body in respect of Martyn's Law) that their premises falls within scope.
- Ensure that appropriate public protection procedures are in place to reduce the risk of physical harm being caused to individuals if a terror attack were to occur on the premises or in its vicinity. These are procedures for:
 - o evacuation;
 - o invacuation;
 - o preventing individuals from entering or leaving;
 - o providing information to individuals at the premises.
- In the case of enhanced tier premises only, assess and keep under review public protection measures and ensure that such measures are in place to reduce the vulnerability of the premises to acts of terrorism. These are measures relating to:
 - o the monitoring of the premises and/or its immediate vicinity;
 - o the movement of individuals into, out of and within the premises;
 - o the physical safety and security of the premises; and
 - o the security of information in relation to the premises.

Venues are required to implement procedures and measures that are 'reasonably practicable', which is to say 'proportionate' to their circumstances.

The SIA has the right to scrutinise procedures and measures and has enforcement powers where requirements are not being met. However, the SIA have made it clear that they want to 'walk... premises toward compliance' rather than take a more draconian approach.



What does it mean for me and my club?

Martyn's Law is not just another regulatory update. It will place significant obligations on football clubs and will affect how they plan for and manage their operations.

All professional football clubs will operate from enhanced tier premises. Most national league football clubs will be in scope, with many expected to fall within the enhanced tier. All affected clubs should be preparing for compliance as soon as possible.

All clubs should consider:

1. Whether their stadium/ground is one qualifying premises, or whether there are distinct qualifying premises within the stadium footprint. For example, a club shop with a maximum capacity of over 200 persons which is directly accessible from outside and which might open/operate otherwise than on a match day might sensibly be treated as its own premises. As might a bar or fan-zone area which sits outside the main stadium. Clubs should consider how these would be treated under the legislation.
2. Who the responsible person(s) will be in preparation for notification to the SIA. It may be that there are multiple responsible persons within one organisation. Taking the club shop example, the responsible person here may be different to the responsible person for the wider stadium. Ground-sharing arrangements may present particular issues that need to be considered.
3. Their maximum expected capacity, either overall or in respect of each qualifying premises. When notifying the SIA, responsible persons will be required to state the greatest number of individuals who can reasonably be expected to be present at the same time and will need to support and justify that number with evidence of how it was determined/calculated.
4. Who they may need to co-ordinate or co-operate with in order to practically comply with the requirements of Martyn's Law. If there is more than one responsible person for one qualifying premises, those persons are obliged to co-ordinate with one another in putting public protection procedures and measures in place. Clubs should therefore consider how they will manage those relationships in practice.

If a qualifying premises forms part of other qualifying premises (club shop/hotel/fitness centre, for example), the responsible persons for each premises must co-ordinate with each other in the same way. This may need additional consideration where linked premises are independently owned or operated.

Additionally, where a person is not responsible for a premises, but has control over it to any other extent, they must co-operate with the responsible person. Clubs should therefore consider whether they require co-operation from any other party to implement public protection procedures or measures – for example, do they need landlord approval for any physical security features, like hostile vehicle mitigation where it is considered proportionate to introduce?

Finally, all clubs should consider the substantive requirements of the legislation in terms of public protection procedures and measures. They will need to practically consider their procedures in terms of evacuation and invacuation, for example, and ensure that these are up to date, robust and operational. Some clubs may benefit from specialist advice on how those procedures should operate in practice at their ground.



Readiness roadmap

- Identify the qualifying premises
- Identify the responsible person(s)
- Identify your maximum expected capacity and be prepared to explain how it was calculated
- Identify co-ordination and co-operation contacts
- Prepare public protection procedure documents
- Consider and implement public protection measures
- Stay on top of updates in terms of implementation timescales

When must I be compliant by?

At the moment, there is no confirmed implementation date for Martyn's Law, but it will not be before April 2027. However, it could well be that implementation occurs in, or very quickly after, that date. Indeed, the SIA have said that it is expected that the provisions of the Act will come into force in 'spring 2027'.

Clubs should be planning to be compliant by (or before) April 2027 and therefore ready to register in the relevant window. Clubs should not wait for the announcement of the commencement date before starting to make the necessary preparations – these changes are coming and any delay beyond spring 2027 will be brief.

For some clubs, the preparation required may be extensive and time consuming. Leaving preparations to the last minute may create avoidable challenges around documentation, responsibilities and co-operation arrangements, and could lead to enforcement action from the SIA.

Whilst there is still uncertainty around the commencement date itself, what we do know is that those responsible for qualifying premises will be required to notify the SIA within three months of the commencement date. This could mean that this process will need to be completed by July 2027. The notification process will include confirming expected maximum capacity and providing details of any persons who are under an obligation to co-ordinate or co-operate with you.

What questions should you be looking to answer now?

- Who 'owns' Martyn's Law compliance within your club/organisation?
- Who needs to be involved in preparation for compliance?
- How prepared are we based on our current safety, security and emergency procedures?
- Do we clearly understand what Martyn's Law requires of us?
- What evidence or documents will we need to demonstrate compliance?
- Will there be any joint responsibility elements to take into account or other parties who will need to be consulted?

What help is available and where do I find it?

Clubs may need input from multiple professionals to ensure compliance with their Martyn's Law obligations.

TLT LLP can provide tailored legal advice and help with your legal obligations under Martyn's Law, including consideration of:

- What qualifying premises your club operates, and whether your club is one qualifying premises or more
- Whether your premises is standard or enhanced tier
- Who the responsible person(s) is or should be
- Who you are obliged to co-ordinate and co-operate with, and who is obliged to co-ordinate and co-operate with you
- Assistance with the notification process
- Review of compliance documents.

Key takeaways

1. Martyn's Law will require positive action from almost all clubs.
2. Compliance is likely to be required from April 2027, or soon after.
3. Preparation can and should start now!



Common questions

Q. My biggest gate of the season is usually circa 800. Which level does this put me into?

Unless you can show that all gates, plus all other persons on site, such as players, staff and security, in any given season are under 799, you will fall into the enhanced tier. One match a season over 799 persons is likely to be considered enough. Only if there is an unpredictable single match taking you over 799 would you be able to argue to remain in the standard tier. The evidence that will matter includes highest and recurring attendances, total people on site, ground capacity, and patterns around derbies, play-offs and other historical games that are likely to recur.

Q. My biggest gate of the season is circa 150 but I play in the FA Cup and could draw a club from a higher level with more visiting fans. Which level does this put me into?

If 800 or more people in total can reasonably be expected to be present from time to time, the premises is likely to fall within the Enhanced Tier. A spectator gate below 800 does not by itself answer the question.

Q. Do I have to install any equipment?

The Guidance does not require specific measures to be taken. Standard tier premises are not required to take measures. Enhanced tier premises are required to take measures proportionate to the size and scope of the premises and what can reasonably be achieved. Understand the requirement before spending.

Q. Who should train my volunteers who have to implement Martyn's Law?

The tier that your premises falls into and the requirements identified in your plan will dictate who needs training, to what level and who is best qualified to give it.

Q. What are the penalties if I'm found to be in breach?

There are various actions the SIA can take from serving compliance, restriction or closure notices (with fines of up to £5,000 for contravention of a notice), through to daily fines (max £500 standard tier or £50,000 enhanced tier). In serious cases, offences are criminal and penalties on conviction can be up to £10,000 for standard tier or £18 million (or 5% of qualifying worldwide revenue) for enhanced tier.

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Rebecca specialises in alcohol and entertainment licensing, advising a wide range of clients in the leisure and hospitality space, from bars and restaurants to event spaces, festivals, sports stadia and property developers.

Martyn's Law and non-league football

By Mark Harris, Founding Partner, Football Pyramid Partnership

The question for non-league clubs is not simply “what is our average gate?” but how many people can we reasonably expect to have on site at the same time, from time to time?

A new compliance challenge for a volunteer-led game

For non-league football, Martyn's Law arrives at a time when the need to improve public safety is clear, but the clubs expected to implement it vary enormously in scale, resources, facilities and professional capacity. In reality, a Step 1 stadium and a volunteer-run Step 6 ground are worlds apart.

The FA is understood to be preparing football-specific guidance, including for NLS clubs, ahead of commencement. The publication timetable and the period clubs will have to act on that guidance should be confirmed before publication of this guide.

The guidance is expected to focus on prevention, preparation and proportionality rather than mandating particular hardware or software. CCTV, for example, is not a universal answer because some stadia, even at Step 1 (National League) lack a control room from which a system could realistically be managed.

The priority is therefore likely to be on having procedures properly documented, with the right people identified, briefed and trained. For volunteer-led clubs, the priority is to establish what is actually required before committing scarce funds.

The attendance trap: average gates do not decide the tier

For non-league clubs, the issue is what that test means on a match day. The headcount is not the published gate: it is everyone reasonably expected to be on site at the same time.

This could catch clubs whose usual gates make them appear safely below a threshold. Take a club averaging 150 spectators. Add two squads and management teams, match officials, directors, stewards, turnstile staff, bar and catering teams, medical staff, media, and hospitality guests. The actual number on site may already be over 250.

Fixture patterns matter too. A 150-average club might attract 250–300 for local derbies, 400 for a play-off or considerably more for a promotion decider. Please refer to the TLT guidance in this paper. A predictable annual spike can therefore matter in a way that an exceptional, genuinely unforeseeable one-off

Club A	Club B	Club C
Average gate: 150	Average gate: 150	Average gate: 150
Total on site rarely reaches 200	Predictable fixtures take total on site above 200	Predictable occasions take total on site to 800+
Could remain outside scope	Could fall within Standard Tier	Could fall within Enhanced Tier

The Government's examples underline the point. Its guidance describes a community-owned rugby club whose normal attendance is below 800 but which has exceeded that figure for local-rival fixtures on several occasions; the premises are treated as Enhanced Tier.

For non-league clubs, that distinction is fundamental. An annual derby that reliably produces a large crowd is different from drawing a much bigger club in an extraordinary FA Cup tie. Capacity alone does not settle the question either: what matters is the number reasonably expected to attend, supported by evidence.

What this means operationally

Clubs that wait for football-specific guidance before doing any preparatory work may find the implementation window uncomfortably short.

The Health & Safety lead may also be the club secretary, stadium manager or director. Match day teams change. Volunteers may only attend occasionally. Procedures that exist in a folder but are not understood by the people expected to use them will offer little practical protection.

Clubs should use the period before football-specific guidance is published to become Martyn's Law-ready by getting their evidence and people in order. That doesn't mean buying equipment prematurely. It means understanding the stadium, its attendance patterns and its match day workforce well enough to respond quickly once the football guidance is available. In practice that means:

- Assembling attendance evidence
- Mapping who is on site on match days.
- Identifying the people who will implement related procedures.
- Training volunteers and making sure match day arrangements work in practice.

The unanswered NLS question

The issue for the 996 clubs at Steps 1–6 of the NLS is the number that appear to sit below the thresholds on the sole basis of average attendance, but who could fall into Standard or Enhanced Tier because of occasional, predictable larger crowds.

The evidence that matters includes highest and recurring attendances; the frequency of 200+ and 800+ occasions; total people on site rather than spectators alone; ground capacity; and patterns around derbies, play-offs and other predictable peaks.

Until that work is done, the scale of Martyn's Law's impact on the NLS remains uncertain. What is already clear is that clubs should not assume that a low average attendance puts them outside the legislation – or that a large, licensed capacity automatically puts them in the Enhanced Tier.

THE FPP VIEW: DON'T BUY FIRST. UNDERSTAND FIRST.

Map your attendance peaks, count everyone on site, document who does what and identify the volunteers who will need to understand the procedures. Then apply the FA guidance proportionately when it arrives.



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Mark Harris helps non-league football clubs and leagues build more sustainable futures. He co-founded Football Pyramid Partnership in summer 2026 after leaving the Northern Premier League and Football Association, where he spent 17 and 9 years respectively. His specialist expertise is in commercial development and sponsorship, having led on both for the Trident Leagues since 2021. He is also an award-winning creator of content and events in the business travel and meetings sectors.

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FA statement



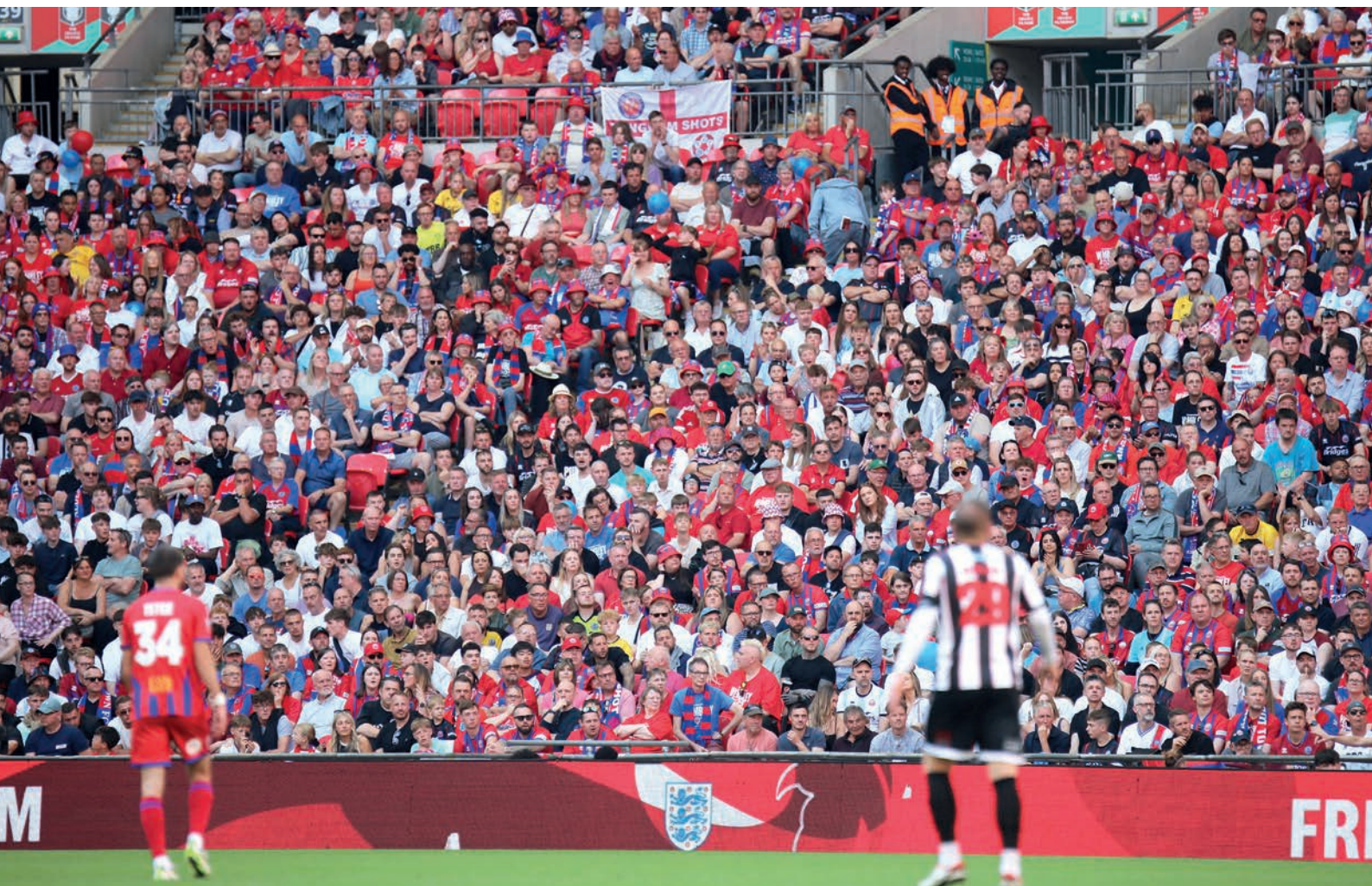
The following was issued to National League System clubs in 21st September 2026.

We are aware that many football clubs and facilities are considering the implications of Martyn's Law, with requirements due to come into force from April 2027. The FA is working closely with the Home Office, wider government, and partners across sport to help ensure that additional guidance developed around Martyn's Law is proportionate, practical, and reflects the diversity of venues across the game.

Supported by The FA, Sport England is visiting a number of sports clubs, including football clubs with grassroots, National League System, and Women's Football Pyramid teams, to better understand the potential impact of the legislation and help inform sport-specific guidance. Alongside wider sport guidance, The FA is also exploring the development of dedicated guidance for football clubs and facilities. We will continue to share updates as further information becomes available.

In the meantime, we are aware that some third-party organisations are contacting clubs and offering paid-for support and compliance services related to Martyn's Law. Any decision to engage such services is, of course, a matter for individual clubs. However, with implementation still some way off and further official guidance expected, clubs may wish to wait for additional clarity before committing to significant expenditure. Clubs and facilities can familiarise themselves with the Home Office's existing statutory guidance for the Terrorism (Protection of Premises) Act 2025, available [here](#), which provides information on the scope of the legislation and the requirements for premises and events.

For National League System clubs specifically, The FA recognises the importance of ensuring that the support available reflects the realities of operating at this level of the game. We are therefore exploring dedicated NLS guidance, informed by the work taking place with Sport England and visits to NLS clubs, to translate the requirements into practical and proportionate support for clubs across the pyramid.



Sources and further reading

Home Office - Terrorism (Protection of Premises) Act 2025: Statutory guidance

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

Home Office - Supplementary document A: Methods for assessing the reasonable expectation of individuals present

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Home Office - Supplementary document B: Scope – illustrative examples

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Security Industry Authority - Understanding Martyn's Law and the SIA's role as regulator

<https://www.gov.uk/guidance/understanding-martyns-law-and-the-sias-role-as-regulator>

Home Office - Enhanced duty requirements factsheet

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

PoliticsHome - Non-League Teams Fear New Anti-Terror Law Could Be Too Costly To Follow

<https://www.politicshome.com/news/article/non-league-teams-fear-new-anti-terror-law-costs>

TLT - Martyn's Law receives Royal Assent: act now, do not wait

<https://www.tlt.com/insights-and-events/insight/martyns-law-receives-royal-assent--act-now-do-not-wait/>

TLT - Martyn's Law notification guidance: practical points to know and prepare for now

<https://www.tlt.com/insights-and-events/insight/martyns-law-notification-guidance-the-practical-points-to-know-and-prepare-for-now>

About this paper

Martyn's Law and Football Clubs was written by Rebecca Lowe and Piers Warne, TLT LLP, and by Mark Harris, Football Pyramid Partnership.

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Stadium Link helps football clubs connect infrastructure, digital systems and supporter data to improve the way they operate, engage and grow. From Wi-Fi, connectivity and club apps to CRM, match day revenue, sponsor visibility, mapping and safety-readiness workflows for Martyn's Law, Stadium Link brings key functions into one joined up environment. The aim is simple: stronger infrastructure, better insight, increased revenue and practical support for better-connected, better-prepared safer clubs.