



Home Office

PROTECT DUTY CONSULTATION GOVERNMENT RESPONSE DOCUMENT

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INTRODUCTION

This is the Government's response document to the Protect Duty public consultation.

The response document details the following:

- An outline of why the consultation took place;
- Statistical reporting of the responses and summaries of the key themes; and
- An indication of how consultation responses will feed into Protect Duty considerations

If you wish to provide any comments regarding this response document, the public consultation or the Protect Duty, please contact the Home Office at the following address:

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For an accessible format of this document, please visit:

www.gov.uk/government/consultations/protect-duty

MINISTERIAL FOREWORD

The first duty of the Government remains to protect the public. Since the publication of the Protect Duty consultation document in February, we have seen further terrorist attacks in the UK, with the tragic death of Sir David Amess, and the attack in Liverpool. Four further plots have been disrupted by UK police and security services. Terrorist attacks can potentially occur anywhere, in large or small venues, at a range of locations. It is vital that the Government continues to consider how and where improvements can be made to combat the threat of terrorism and further enhance public security.

The Protect Duty consultation received a significant number of responses, and the views expressed and presented in this document, and through consultation events, have provided a detailed evidence base of the opinions of the public and those organisations which operate at public places, as to what a legislative requirement could achieve and how it could best be taken forward.

The Protect Duty would be one means by which we seek to further enhance public security, sitting alongside our existing and ongoing work programmes to achieve this aim. I have noted the strength of views expressed in response to several consultation questions, that it is right that those responsible for public places should take measures to protect the public and to prepare their staff to respond appropriately. In short, taking measures to ensure that there is an appropriate and consistent approach to protective security and preparedness at public places is a reasonable ask. However, the responses also highlighted the challenge of which organisations should be in the scope, and what would constitute proportionate security measures. This includes ensuring that there is not an undue burden on organisations, particularly those which are smaller in size or staffed by volunteers, such as places of worship. These are issues I am considering carefully. The Government's impact assessment for the Duty and its requirements will also robustly assess the question of costs and burdens further.

I have also noted the views of respondents to the consultation, who have questioned whether those responsible for public places should play a role in public security at all - as opposed to the security services, the police, and other emergency services. The work of these organisations remains the bedrock of our counter-terrorism efforts, and Government continues to consider how their effectiveness can be further improved and enhanced. The Protect Duty would be a basis to seek a more defined contribution from other partners who have a vitally important role to play. As we know from our ongoing efforts across the public and private sectors to combat terrorism, it is through effective partnerships that the greatest outcomes are achieved. As was also highlighted in the consultation, it is essential that a range of tools, guidance and support is delivered to ensure that the ask of those in scope of the Protect Duty is understandable and deliverable.

I recently met Figen Murray, the mother of Martyn Hett, who died in the Manchester Arena attack, and other representatives of the Survivors Against Terror Campaign Team, who have campaigned for 'Martyn's Law', to ensure a specific legislative requirement be developed. I have also engaged with the Counter Terrorism Advisory Network, a national stakeholder forum, whose membership includes survivors of terrorism. Listening to and

reflecting on the experience of survivors has reaffirmed my commitment to take forward Protect Duty legislation.

The views and opinions outlined in this document, will be of great importance to shape our thinking in developing a legislative approach, which the Government is now progressing.

**DAMIAN HINDS MP
MINISTER FOR SECURITY AND BORDERS**

BACKGROUND

The United Kingdom has suffered a number of recent low-sophistication terror attacks at public spaces, in addition to the devastation of larger-scale atrocities such as that at the Manchester Arena. The targeting of such locations is usually an individual choice which cannot always be anticipated. Attacks could potentially occur at any location, and preventing them can prove challenging, highlighting the Government's decision to consider what more could be done to improve public protection.

There is currently no legislative requirement for organisations to consider or employ security measures at the vast majority of public places. Many organisations choose to implement their own security measures, ranging from the consideration of risk assessments leading to a range of emergency plans and procedures being in place, undertaking staff training and awareness raising, and employing security systems, processes and measures to mitigate threats. Whilst all such efforts are welcome and encouraged, the proposed Protect Duty would aim to create a culture of security, with a consistency of application and a greater certainty of effect.

The purpose of the consultation was to consult private and public sector partners as to how appropriate considerations of security could take place, leading to proportionate security measures at publicly accessible locations, and what support would be required from Government. A publicly accessible location is defined as any place to which the public or any section of the public has access, on payment or otherwise, as of right or by virtue of express or implied permission. For clarity, public places/venues are permanent buildings (e.g. entertainment and sports venues) or temporary event locations (such as outdoor festivals) where there is a defined boundary and open access to the public. Public spaces are open public locations which usually have no clear boundaries or well-defined entrances / exit points (e.g. city centre squares, bridges or busy thoroughfares, parks, and beaches).

The consultation was open to the public, but particularly encouraged responses from those who own or operate publicly accessible locations. Our key objective was to utilise feedback from invested members of the public to further develop and mould legislative proposals and consequently, create safer places and spaces. We continue to engage with stakeholders and other Government departments to shape policy proposals and to advise Protect Duty legislative proposals.

EXECUTIVE SUMMARY

The Protect Duty consultation ran from 26th February 2021 to 2nd July 2021 and in total, 2755 individuals or organisations responded to the consultation via an online survey or e-mail. A breakdown of how they submitted their responses can be found below.

Response Method	Stakeholder ¹ Response	Non-stakeholder response	Campaign Responses	Total
Online form	479	1785	0	2264
E-mail	0	195	296	491
Total	479	1980	296	2755

There were zero responses received via post.

Respondents had the opportunity to answer 58 questions spread across four thematic sections. The sections were broken down as follows:

- Section 1: Who (or where) should legislation apply to?
- Section 2: What should the requirements be?
- Section 3: How should compliance work?
- Section 4: How should Government best support and work with partners?

Section 1: Who (or where) should legislation apply to?

Section one sought views on who (or where) legislation should apply to.

A majority (seven in ten) of respondents agreed or strongly agreed with the concept that those responsible for publicly accessible locations should take appropriate and proportionate measures to protect the public from attacks at these locations. Seven in ten respondents also agreed that responsible venues and organisations should prepare their staff to respond appropriately in the event of a terrorist attack.

When considering which locations should be within the scope of the Duty, the most popular responses within the free text questions throughout the consultation were all publicly accessible locations (mentioned 53 times), followed by all locations in general (32), then large gatherings (31). Further to this, participants generally tended to agree that larger

¹ For analytical purposes, a stakeholder was defined through respondents that self-identified as owning, operating, being responsible for security, having business dealings, representing the views of or working in a business of one or more PALs

organisations (250+ employees) should be included in scope compared to smaller organisations, with very few considering micro-organisations (1-9 employees) to be within scope.

Fifty-eight percent of respondents considered that there should be no exemptions from the Duty (other than those proposed for certain transport sectors where similar legislation already applies). For those who considered that there should be exemptions, the most popular considerations were for: locations in low-risk (particularly rural) locations; based on the score of a risk assessment; for charities and venues run primarily or solely by volunteers; for community groups and village halls; and places of worship, particularly if they are small.

When asked what criteria would best determine which venues a Duty should apply to, the capacity of a venue was the most popular criterion. However, there were also a wide range of other proposals, of which the most popular were based on an evaluated risk of a location; average, rather than maximum, capacity of a venue; the geographical setting of a location; and the type of event held at a venue.

For those who considered capacity was the best criterion, over half considered that a threshold of 100 persons or more should determine venues in scope of the Duty. The mean of all suggested capacity thresholds was 303 persons.

Section 2: What should the requirements be?

Section two sought views on what the parties within the scope of the Protect Duty should be required to do, and also assessed protective security and preparedness considerations currently undertaken by those responsible for publicly accessible locations.

In general, there were very strong views expressed on the need for accountability within the Duty. This predominantly referred to the need for clear roles and responsibilities, particularly amongst event organisers, and those at senior level within venues and organisations.

Half of respondents that operate or own a publicly accessible location currently undertake a risk assessment to consider the threat of terrorist attack. These are reviewed most commonly multiple times or once a year. Mitigating activities and measures most commonly progressed to combat terrorist threats were: liaison with police or other resource (e.g., security consultant) on threats and appropriate security measures; work to ensure security behaviours are adopted by the workforce; and staff training to raise awareness of the threat and what to do.

The consultation sought views on how security considerations are currently and could potentially be undertaken in future at public spaces (locations which usually have no clear boundaries or well-defined entrance / exit points e.g., city centre squares, bridges or busy thoroughfares, parks, and beaches). Staff awareness raising and training courses, communications campaigns, and advice/guidance products and tools, were considered to

represent the best existing activities and mechanisms to improve protective security and organisational preparedness outcomes. In terms of how organisations that work at public spaces could better consider threats and mitigations in future, respondents considered this could be through engagement with the police, making requirements mandatory through legislation, and improving collaboration.

Of existing local authority functions which assist in realising protective security and organisational preparedness outcomes at public spaces, health and safety, fire safety and building control processes, Safety Advisory Groups (for events), and Community Safety Partnerships were considered to be of greatest current value.

Through a specific free text question, from those who responded, slightly more participants opposed a future potential requirement for local / public authorities and other relevant local partners to develop a strategic plan to combat terrorism. Local authorities were considered the leading organisation to bring together security partnerships, receiving three times as many nominations as the next most popular answer, the emergency services.

Where there is existing Government Guidance (e.g., relating to bus and coach operators) two thirds of respondents considered it would be appropriate for this guidance to become legislative under Protect Duty.

A recurring subject throughout the consultation and its responses was concern that the Duty may negatively impact organisations financially. The findings have been fed into our proposals and a Duty Impact Assessment is to be completed to further consider financial implications, in tandem with any wider impact.

Section 3: How should compliance work?

Section three of the consultation sought views on how compliance with the Duty's requirements could be achieved through developing an inspectorate regime and appropriate sanctions for non-compliance.

Of those (385 respondents) that offered a view on support or opposition for an inspectorate, just over 50 percent of respondents (194) were in favour of an inspectorate which would support improvements to security culture and practices within organisations in scope. Their reasons were most commonly that it would identify key areas for improvement or vulnerabilities, act as a means of sharing best practice, and to deliver the key objective of the Duty to improve public safety.

The respondents who did not support the development of an inspectorate considered that it was a heavy-handed approach which could have significant financial implications, and cited challenges that may arise, especially regarding taking forward enforcement action.

There was also an even split in respondents who were supportive of the use of civil penalties (fines) to ensure compliance with the Duty. Those who were in favour considered

that these would increase compliance, organisational buy-in and accountability. Those who opposed, suggested that they were unfair, organisations should not be punished instead of the terrorists, plans to instigate them were currently ambiguous, that it would potentially be costly to organisations, and that it would be a challenge to enforce.

Section 4: How should Government best support and work with partners?

Section four sought views on how the Government currently provides advice and guidance to those responsible for publicly accessible locations, and how these efforts could be enhanced to support the delivery of the Protect Duty.

Just over half of respondents that operate or own a publicly accessible location currently accessed information regarding threats and mitigations provided by Government (primarily from Counter Terrorism Policing and the Centre for the Protection of National Infrastructure). For those who did, they considered the following to be the most valuable: Counter Terrorism Security Advisors; Threat levels, and general, current, local and specific attack methodologies; and Government training and advice products.

Almost four in five respondents indicated that they would use the new digital service being developed by Counter Terrorism Policing, the Government and the private sector to provide access to relevant counter-terrorism material, advice and training in one place for organisations operating in publicly accessible locations. The most frequent reasons provided were to be updated on emerging terrorist threats, to understand risk management processes, and to access counter-terrorism training.

With regard to what respondents considered would be the most helpful mechanisms and tools to assist compliance with the Duty, the most popular suggestions were: a single, digital service where you could access relevant material, advice and training in one place; a risk assessment template and information on undertaking a risk assessment for terrorism threats; easy to digest information regarding threat and attack methodologies; advice on what constitutes reasonably practicable and appropriate mitigations appropriate for my circumstances; and staff training and awareness courses.

As well as the provision of Government advice and guidance, respondents were also asked where Government could support the provision of high-quality advice and guidance by private sector security professionals. The main suggestions were: developing standards for counter-terrorism risk assessments and advice; supporting accredited training and qualifications for individual security professionals; supporting the regulation of counter-terrorism consultants; and a Government-regulated approved contractors' scheme.

The themes raised most commonly regarding support associated with the Duty were: a need to ensure advice and support is bespoke and not 'one size fits all'; undertaking effective engagement and communications activities; and the need to involve security experts when it comes to providing advice and guidance.

CONSULTATION EVENTS

In February 2021 Home Office officials began a targeted engagement programme with a wide range of organisations, industry representatives and operational partners with an interest in the Duty.

Initial engagement focused on promoting awareness of the consultation through a range of communications and engagements across Government and its partners. This later developed into workshops with specific interested groups and sectors, providing an opportunity to comment directly on the strategic approach and the specifics of proposals, encouraging further comments through the official consultation channels, ultimately working together to build a vision for the future Duty and its operating model.

In total, over 80 virtual engagement events were undertaken on the Duty proposals. A non-exhaustive list of those engaged with includes:

- Sector representatives from retail, entertainment, sports, health, hospitality, education, insurance and banking, major events, security, tourism, faith communities, and transport;
- Government departments;
- Local authorities, councils and associations;
- The Police;
- Security experts and authorities;
- The Martyn's Law Campaign team;
- Devolved Administrations; and
- Various other advisory groups and forums

Legislative principles, including thresholds for inclusion within the Duty, were reviewed and re-assessed based on discussion and feedback throughout. There was also a thorough consideration of the operation of comparable legislation and regimes, such as fire safety and health and safety, and where learning could be taken from these.

Based on comments and views received from early consultation events, further events were scheduled with representatives from specific sectors, for example the faith, voluntary and charity sector, to consider the potential impact of the Duty's proposals on these groups.

Whilst many of the comments made and issues raised at these events were replicated in consultation returns, there were also some additional points made, and an outline of these is provided at Annex A.

INTERPRETING FINDINGS

In the main, the Home Office sought participation from those that own or operate publicly accessible locations, but the consultation was also open to all, including members of the general public who held a particular interest in the subject matter.

Of the 58 questions posed within the consultation:

- 24 were fixed responses;
- 31 were open to a free text qualitative response; and
- 3 were open to a free text quantitative response.

To analyse the free text responses, a system of coding was employed where specific words or themes are grouped together. The coding included further analysis aspects, such as whether a response was positive or negative.

This enabled us to scrutinise and subsequently present the results within this consultation response document, providing additional guidance to develop a framework for policy behind the Duty.

The coding was updated throughout the consultation analysis period to ensure that new themes were identified and encompassed throughout the process.

Fixed responses were often employed at the beginning of a section as a quantitative baseline, but most questions also provided the opportunity to select a free text response if required.

The following breakdown, in descending order, provides an indication of the demographics that those who chose to respond online identified with:

- 33% were members of the public, 33% owned or operated one or more PAL, 30% were responsible for security at one or more PAL, 17% represented the views of one or more PAL, 17% stated “other organisation”, 13% work in a business within a PAL and 11% have business dealings with one or more PALs.²
- 32% worked for a large organisation (250+ employees), 29% worked for a micro-organisation (1-9 employees), 12% stated “not applicable”, 11% worked for a small organisation (10-49 employees), and 11% worked for a medium organisation (50-249 employees). 5% did not know their organisation’s size.
- 23% work for a company, 17% work for a non-profit body or mutual organisation, 13% work for a local authority, 4% work for a public corporation, 3% are sole proprietors, 2% work within central Government and 1% work for a partnership. 37% identified with “other” for their business or organisation.
- 34% of responses were from Places of Worship, 25% were from Events, 21% were from Entertainment, 19% were from Hospitality and 18% were from Education.

² Respondents were given the opportunity to identify and select multiple options meaning that the percentages exceeded 100%

- 17% of responses were from the South-East of England, 17% were from Greater London, 13% identified with “multiple locations”, 10% were from North-West England, and 9% stated “other”.
- 72% of respondents operate or are located in urban areas whilst 28% stated rural.

It is assessed that those who responded are likely to be heavily invested or potentially affected by any incumbent Duty, giving a more polarised analytical outcome than if all members of the public or all businesses had responded.

This notion is further highlighted when considering campaign responses. Respondents with a vested interest may be part of larger groups who communicate similar or identical responses in an effort to influence results, and subsequently, the direction of any incoming Duty. Such activity may be organised through leaders of an organisation and specific suggested text provided through a variety of means.

Due to the replication within certain responses, it was established that there were 296 campaign responses submitted as part of the consultation, predominantly from the faith sector.

Percentages highlighted throughout the consultation response document have been rounded to the closest whole number. Each question may have received a different number of responses, based on the type of question and the respondent’s choice of whether to answer.

The consultation findings, as reflected through the Consultation Response Documents, can only be used to record the various opinions of the members of the stakeholder and non-stakeholder participants who have chosen to respond to the proposals contained within the Consultation Document. Due to the self-selecting nature of the method, findings should not be aggregated up to be representative of any type of participant, nor be used to represent the wider opinion of any particular sectors.

The document will now present the key statistics and themes from the four sections of the consultation.

SECTION 1: WHO (OR WHERE) SHOULD LEGISLATION APPLY TO?

Section 1 of the consultation primarily focused on who, and where, the Duty should apply to, seeking the views of respondents through eighteen questions.

Support of a legislative requirement for the Duty

The first question seeks the appetite for there to be a requirement for appropriate security measures against terrorist attacks in publicly accessible locations.

<i>Q1. Venues and organisations owning, operating or responsible for publicly accessible locations should take appropriate and proportionate measures to protect the public from attacks in these locations</i>	Strongly Agree/Agree	Neither agree nor disagree	Strongly disagree/disagree
Total respondents: 2345	71%	11%	18%

Fundamentally, feedback suggested that such measures would be welcomed, as a 71% majority of respondent's stated that they support appropriate and proportionate measures to protect the public at public locations.

Respondents were also given the opportunity in section one to outline which specific places that they felt the Protect Duty should apply to through free text responses. Rather than one particular place, all publicly accessible locations was the most popular option and mentioned 53 times. This was followed by all locations in general which was selected by 32 people and generalised large gatherings by 31 people. Private venues received 20 mentions.

Conversely, when considering places that should remain out of scope for the Protect Duty, 128 people felt that places of worship should be excluded. This was trailed by 84 suggestions for charity or voluntary organisations, and 40 for nondescript small organisations.

Duty Criteria, Metrics and Organisational Thresholds

Of the three proposed criteria for venues that the Protect Duty should apply to, capacity was significantly more favoured than the other two proposals, with 39% of all responses.

<p><i>Q3. We propose that a targeted Protect Duty applies only to certain public venues. What criteria would best determine which venues a Duty should apply to?</i></p> <p>Total respondents: 2388</p>	Capacity	Annual Revenue	Staffing Levels	Other
	39%	9%	5%	47%

Respondents were permitted to select multiple criteria and/or provide further comment. Of those who selected other, the following four suggested criteria featured most prominently:

- Evaluated risk of a publicly accessible location;
- Average, rather than maximum, capacity of a publicly accessible location;
- Geographical setting of a publicly accessible location; and
- Type of event held at a publicly accessible location

When considering the potential for capacity to be the key criteria for venues within scope of the Protect Duty, we suggested a venue capacity of 100 persons as an appropriate threshold and sought feedback.

<p><i>Q4. What capacity level do you think would be appropriate to determine venues in scope of the Duty?</i></p> <p>Total respondents: 806</p>	100 persons	Higher than 100 persons	Lower than 100 persons
	53%	31%	16%

Although the majority of the respondents to this question felt that a 100 person venue capacity was an appropriate threshold for inclusion, respondents were also given the opportunity to provide their thoughts on what the exact number for capacity should be; 806 participants provided a free text response.

<p><i>Q5. What threshold would you propose for inclusion in the scope of the Protect Duty for this criterion?</i></p> <p>Total respondents: 1582</p>	Mean average of all responses	Mean capacity of respondents who suggested that the threshold should be higher than 100 persons	Mean capacity of respondents who suggested that the threshold should be lower than 100 persons
	303	824	47

Additionally, we proposed that the number of staff employed by organisations should be considered as a criterion for the Duty, and suggested that organisations with 250 or more employees should be within scope.

<p><i>Q10. We propose that a Protect Duty would also apply to certain organisations operating at publicly accessible locations. If an organisation's size were a criterion for its inclusion in the scope of the Duty, what would be an appropriate threshold?</i></p> <p>Total respondents: 2348</p>	All	Micro (1-9)	Small (10-49)	Medium (50-249)	Large (250+)	Other
	28%	2%	8%	16%	21%	25%

In parallel with the free text responses from question one, 28% of the respondents to question ten suggested that all organisations (with any number of employees) should be included within the Duty.

Respondents were also asked to provide further detail into the reasoning behind their chosen metric. Those that suggested all organisations should be in scope most commonly stated that this was due to the belief that the risk of an attack can occur anywhere and that all lives should be protected. Respondents also considered that all organisations have a

duty of care and that there should be a collective effort by all to support protective measures in the workplace.

Those that elected for the threshold for inclusion to focus on medium or large sized organisations felt that such organisations would be in a better place to manage any subsequent requirements of the Duty in terms of their resources and experience. Other respondents expressed views that any suggested measures would be a burden to small or micro-organisations, that all lives should be protected regardless of the organisation’s size, and that the term “organisation” needs to be clearly defined.

Responsibility and Working Together

The consultation presented several questions regarding who should have the responsibility for security measures at publicly accessible locations and how organisations can best work together to achieve shared protective goals.

<p><i>Q2. Venues and organisations owning, operating or responsible for publicly accessible locations should prepare their staff to respond appropriately in the event of a terrorist attack to best protect themselves and any members of the public present</i></p> <p>Total respondents: 2345</p>	Strongly Agree/Agree	Neither agree nor disagree	Strongly disagree/disagree
	71%	11%	18%

71% of respondents to question two felt that organisations should have an obligation to appropriately prepare their employees to respond appropriately to an attack.

<p><i>Q6. We propose that a requirement to consider security and implement appropriate mitigations at a venue should fall to the owner and/or operator of the venue. Do you consider this appropriate?</i></p> <p>Total respondents: 2349</p>	Yes	No
	67%	33%

When considering who should own the Duty requirements at a venue, the majority of respondents considered it appropriate that this should fall to the owners or operators of a venue.

For those that responded “no”, they were given the opportunity in question seven to provide supplementary information to explain why. The most popular view, with 136 mentions, was that the responsibility lies with the Police. The next most common responses were focused on the resources of an organisation and their limiting effects - financially (122) and through not having enough staff to manage the additional responsibility (116).

<p><i>Q8. We propose that where there is a shared organisational responsibility for a venue, or multiple organisations operating at a venue within scope, the parties would have to work together to meet the requirements. Do you consider this is appropriate?</i></p> <p>Total respondents: 1198</p>	Yes	No
	82%	18%

A notable number of respondents to question eight, 82%, felt that parties should have to work together to consider security requirements where there is a shared responsibility for a venue. Of the 18% of the responses that felt multiple organisations should not work together to meet the requirements of the Duty, question nine provided an opportunity to outline why. Respondents cited that this could be problematic for many organisations, especially those in voluntary or community-based sectors. Other less-commonly presented views were that a shared responsibility could lead to confusion of assigning responsibility and avoiding liability, leading to the suggestion that one party should take the lead, whoever that may be.

Exemptions from the Duty

Annex 1 of the public consultation described areas that could potentially be excluded from requirements under the Duty, as there are already existing legislative requirements in place that are likely to achieve similar outcomes to those proposed by the Duty. These were predominantly transport-related and included elements from the rail, aviation and maritime sectors. To supplement these proposals, the consultation sought the views of the public as to whether they felt that there should be any additional exemptions or exclusions from the Duty.

<p><i>Q16. Referring to Annex 1, do you consider that there should be other exemptions from a Protect Duty?</i></p> <p>Total respondents: 2340</p>	Yes	No
	42%	58%

For those who suggested that there should be further exemptions to those outlined in annex 1 of the public consultation, the most common responses focused on the following:

- Exemptions based on risk assessments;
- Exemptions based on rural locations; and
- Exemptions based on activity particularly focused on community, voluntary and faith-based venues.

When considering specific types of venues, there was a strong response to the consultation from Places of Worship. They, amongst voluntary and smaller organisations, sought exemption due to concerns over financial implications, the burden to operations and in some cases, rural locations.

Other Considerations

For question fourteen³, 93% of respondents confirmed an understanding of the definition of a publicly accessible location and how their organisation falls within it. Whilst this is a high proportion, it is imperative that all information regarding publicly accessible locations, and the Duty in general, is as concise and understandable to all in scope.

³ Total respondents: 763

SECTION 2: WHAT SHOULD THE REQUIREMENTS BE?

Section 2 of the consultation presented twenty-three questions that sought feedback regarding potential protective security and preparedness considerations currently undertaken by stakeholder and potential requirements for organisations under the Duty.

Protective Security and Preparedness

The primary focus of the Duty is to improve protective security and preparedness measures in publicly accessible locations. Appropriate measures would be identified in response to risk assessments, and those responding to the survey were asked the following:

Q19. Does your organisation currently undertake a risk assessment for terrorism? Total respondents: 1083	Yes	No
	50%	50%

For the 50% of respondents to question nineteen that do currently conduct risk assessments, their input to the consultation provided the following data:

- 83% produce the risk assessment within their organisation whilst the remaining 17% outsource the process; and
- Those that produce risk assessments internally spend, on average, four days per annum on this task

A breakdown of the frequency that risk assessments are reviewed by those responding is presented below.

Q22. How frequently does your organisation typically review this risk assessment? Total respondents: 977	Multiple times per year	Around once per year	Around once every two years	Around once every three or more years	Other
	41%	37%	6%	4%	12%

Respondents were given the opportunity, through question twenty-three, to detail the protective security and preparedness measures that they currently employ to combat terrorist threats from a list provided. These results provide an indication of what measures organisations currently find most useful or easy to access. The three most selected security measures utilised by respondents were:

<p><i>Q23. What mitigations against terrorism risks does your organisation currently undertake?</i></p> <p>Total respondents: 1083</p>	<p>No. of respondents</p>
<p>Liaison with police or other resource (e.g., security consultant) on threats and appropriate security measures</p>	<p>529</p>
<p>Work to ensure security behaviours are adopted by the workforce</p>	<p>502</p>
<p>Staff training is undertaken to raise awareness of the threat and what to do</p>	<p>498</p>

Question twenty-four⁴ asked respondents about the financial resources provided by their organisation on a yearly basis for mitigation measures against terrorist attacks; 25% of respondents to this question provided a figure which resulted in an overall median average⁵ of £20,000 and a mean average⁶ of £9,640,000. The two most prevalent free text responses highlighted were that organisations did not spend a large amount financially, or that any money spent was event-specific.

⁴ Total respondents: 1148

⁵ The middle value within a data set distribution

⁶ The value when adding a data set together and dividing by the total amount of numbers

Current measures to provide security in public spaces

The consultation considered the potential for specific requirements under a Protect Duty to improve security at open public spaces. Respondents were asked what existing activities and mechanisms realised the best protective security and organisational preparedness measures at public spaces.

<p><i>Q25. What are the existing activities and mechanisms which you consider result in the best protective security and organisational preparedness outcomes at public spaces?</i></p> <p>Total respondents: 1083</p>	<p>No. of respondents</p>
<p>Staff awareness raising and training courses</p>	<p>698</p>
<p>Communications campaigns e.g., Action Counters Terrorism and “See It. Say It. Sorted.”</p>	<p>642</p>
<p>Advice and guidance products and tools</p>	<p>476</p>

The results highlight a clear value placed by respondents on comprehensive and accessible educational tools, training material, and communication campaigns and messaging.

Further questions within the consultation gave us the opportunity to seek additional thoughts on the existing functions of Local Authorities which realise outcomes beneficial for mitigating terrorist threats:

<p><i>Q26. What are the existing local authority functions which currently result in the best protective security and organisational preparedness outcomes at public spaces?</i></p> <p>Total respondents: 1083</p>	<p>No. of respondents</p>
<p>Health and Safety, Fire Safety and building control processes</p>	<p>643</p>
<p>Safety Advisory Groups (for events)</p>	<p>477</p>
<p>Community Safety Partnerships</p>	<p>442</p>
<p>Licensing Committee’s (sale of alcohol and late-night entertainment)</p>	<p>382</p>
<p>Licensing for Sports Ground Safety</p>	<p>345</p>

Working together to improve security at public spaces

For the Duty to be realised, it is key that mandated organisations understand the risks posed and work together to mitigate them where appropriate to do so. This is particularly important for public spaces, where there may be several parties responsible for considering security linked to a large event, or a location with regular and predictable public usage.

Question twenty-nine focused on how those working in such locations could be encouraged to engage with partner organisations to best consider and mitigate threats. This was a free text question, and the ten highest recurring grouped responses were as follows:

<p><i>Q29. How could organisations who work at public spaces be encouraged or required to engage with partner organisations (e.g., police) to ensure there is a better understanding of terrorist threat, the management of risk and mitigating measures?</i></p> <p>Total respondents: 1397</p>	No. of respondents
Engagement with the police	195
Make engagement mandatory and legislate it	180
Improve collaboration	130
Convene local meetings and forums	129
Training	118
Make engagement a condition of licensing	96
Provide clear guidelines	85
More visits and checks from the police	80
Provide funding and resources	76
Provide advice and information	73

Responses highlighted the need for legislation to require all parties to consider threats and mitigations, and also effective engagement and communication between partner organisations, utilising a wide range of means to do so.

Collaboration and sharing of best practice were key features of the responses, relating to questions of the expected standards for public security throughout the consultation. Question thirty sought views on the potential for a legislative requirement for local authorities and other invested partners to develop a variety of plans to combat terrorism and ensure public safety; 35% of respondents provided a positive response to this concept whilst 41% opposed and 24% provided a response with no opinion regarding support. Key

suggestions taken from this question were that any plans should be proportionate to the risk, with clearly defined responsibilities and sufficient resources to be implemented.

Question thirty-two asked respondents what organisations they considered were best placed to lead on building such relationships to consider threat relating to public spaces.

<i>Q32. What organisation/s could play a leading role in bringing together and convening such partnerships?</i>	
Total respondents: 1631	
Local Authorities	20%
Emergency Services	7%
Businesses and Business Owners	6%
Government departments, inc. Home Office	6%
Community Schemes	4%
UK Intelligence Community	3%
CT Police, inc. NaCTSO	3%
Security Industry Authority	3%
Health and Safety Executive	2%
Other	46%

The results presented underline that respondents considered that Local Authorities, and thereafter the Emergency Services, businesses, and the Government, could play a significant role in bringing together partnerships which could consider issues relating to security at public spaces.

Whilst examining partnership-working across sites that already have, or may potentially have, a legislative requirement to consider security, 77% of those that responded to this question supported the proposal in question thirty-five⁷ that it is reasonable to require relevant organisations (for example those surrounding a site where transport security legislation applies) to work in partnership to achieve security outcomes. Those that provided support added that partnership-working would reduce the vulnerabilities of sites and ultimately benefit all parties holistically, including those surrounding public sites.

⁷ Total respondents: 1631

Current Government security advice

Question thirty-six⁸ asked those responding to the consultation if they felt it was appropriate for current Government security guidance (e.g., in relation to bus and coach operators) to become legislative guidance under the Protect Duty to achieve greater assurance of security considerations at affected locations. Of those that responded to this question, 65% supported this measure, predominantly in the belief that it would ensure organisations comply and create a consistent approach, contributing to the common theme to improve public safety broadly, as seen throughout the consultation responses. Of those that opposed, the key view was that current guidance is sufficient, that such legislation would not allow flexibility and may add additional costs.

A similar response was received for question thirty-seven⁹ when considering security guidance for products that could be used as a weapon and if organisations should have an obligation to comply under the Duty; 62% of respondents to this question supported such a requirement with the same common explanations of support provided to question thirty-six. Those who supported and opposed both raised the issue that any guidance would need to be highly definitive of the type of weapons involved, chiefly because any object can be potentially treated as a weapon.

Financial implications of the Duty

A recurring subject throughout the consultation and its responses was concern that the Duty may negatively impact organisations financially. The consultation was supported by Annex 3 which highlighted potential costs associated with the duty, together with the subsequent benefits to those affected. Question forty¹⁰ offered the opportunity for those responding to provide comment on the Annex 3 impact note.

Analysis revealed that 66% of respondents to this question disagreed with the cost and benefit estimates. The main reasons for disapproval include:

- General additional costs, not just for businesses but for the public purse, such as added policing requirements due to the enforcement measures.
- Potential closure of organisations due to additional costs. In particular, small businesses, charities, voluntary organisations and places of worship were deemed most at risk.
- The potential increase in insurance costs.
- The vagueness of expense and overstatement of benefit.

⁸ Total respondents: 1351

⁹ Total respondents: 1371

¹⁰ Total respondents: 977

Many of the reasons above were also noted through responses to other questions within the consultation. The findings have been fed into our proposals and a Duty Impact Assessment is to be completed to further consider financial implications, in tandem with any wider impact.

SECTION 3: HOW SHOULD COMPLIANCE WORK?

Section 3 of the consultation sought views through three questions on how compliance with the Duty's requirements could be achieved through developing an inspectorate regime and appropriate sanctions for non-compliance. An effective inspectorate would be a key component to oversee the effectiveness of the Duty in further improving public security, providing appropriate advice and education, and, where required, taking appropriate sanctions.

Outlook for a Protect Duty Inspectorate

Question forty-two¹¹ sought views as to how an inspectorate function could be used to improve organisational security culture, in line with the envisaged aim of the Protect Duty. We requested a free text response and initially analysed data from the 385 participants that provided responses in support or opposition for an inspection regime. Of those respondents, there was an even divide for (194) and against (191).

For those in support, the most common themes focused on an inspectorate being able to identify key areas for improvement or vulnerabilities, act as a means of sharing best practice, and to deliver a key objective of the Duty - to improve public safety. Additionally, a popular opinion was that the measures proposed as part of the Duty inspectorate were overdue and necessary.

Conversely, those that disagreed with an inspection function suggested it was a heavy-handed approach which could have significant financial implications and cited challenges that may arise, especially regarding taking forward enforcement action.

¹¹ Total respondents: 1780

Inspectorate Introduction and Operating Mechanisms

In question forty-four, participants were given the opportunity to provide supplementary comments regarding how an inspection and enforcement regime could best operate. There were a wide range of responses, and many detailed specific measures which could best ensure compliance with the Duty as per the table below.

<i>Q44. Suggested compliance measures by respondents</i>	No. of respondents
Total respondents: 1780	
Training	115
Regular visits or inspections	104
Audits	65
Penalties or punishments	64
Checks or spot checks	56
Replicating Health and Safety measures	56
Regular unannounced visits or inspections	46
Annual visits or inspections	44
Accreditation system	44
Self-assessments	43

Other respondents provided a more strategic view, outlining considerations to be made before the introduction of any system. The most frequent response was that any inspectorate needed to educate those affected adequately through providing comprehensive advice from the offset and utilising best practice from similar models. Other recurrent themes regarding a Duty Inspection and enforcement function were that it should:

- Be based on a simple and flexible approach, tailored to different organisations
- Undertake effective communication, engagement and collaboration
- Develop a consistent and transparent system
- Combine with other inspectorates, such as Health and Safety or licensing regime
- Grant organisations the opportunity to give feedback to the inspection and enforcement process; and
- Organisations in scope should have clear roles and responsibilities

To ensure participation by those that come under the scope of the Duty, consideration has to be given to how non-compliance will be assessed, and enforcement action taken. The consultation outlined the potential for the use of civil penalties (fines) for those who fail to consider and take forward reasonable security measures. Question forty-three¹² sought

¹² Total respondents: 1780

views on the use of fines, asking the opinion of those taking part in the consultation as to whether they considered it was a reasonable sanction.

Of those who chose to provide a free text comment, 29% offered support, 31% opposed the concept, and the remaining 40% supplied responses with other comments. Those in support noted that the use of civil penalties would increase compliance, organisational buy-in and accountability. Some felt that such measures were necessary for such a regime to operate appropriately and that ultimately, they would assist in enhancing public safety. Those who opposed, suggested that civil penalties were unfair, organisations should not be punished instead of the terrorists, plans to instigate them were currently ambiguous, that it would potentially be costly to organisations, that it could ultimately lead to closure of businesses, and that it would be a challenge to enforce.

Some respondents made suggestions that they considered would improve the proposals regarding inspection and enforcement as presented within the consultation. These included:

- Only employing civil penalties as a last option in cases of continual failure to comply
- Educating those in scope of the Duty instead of enforcing civil penalties
- Developing a sliding scale of civil penalties for those who persistently ignore requirements as part of the Duty; and
- Aligning civil penalties with those in Health and Safety regulations.

Additionally, there were also alternatives proposed to the use of civil sanctions including:

- Incentivisation of best practice through rewards or grants;
- A public rating system;
- Temporary or permanent closure of organisations; and
- Criminal prosecution.

Other Considerations

With regards to civil penalties within question forty-three, it was observed that the terminology of “reasonable steps” was deemed unclear to some, and it has been noted that a more comprehensive definition would be invaluable as part of any legislation. This will also apply for the term “reasonably practicable”, and any other similar requirements defined in legislation and Guidance forming part of an enforcement model.

SECTION 4: HOW SHOULD GOVERNMENT BEST SUPPORT AND WORK WITH PARTNERS?

Section 4 of the consultation focused on how the Government currently provides advice and guidance to those responsible for publicly accessible locations, and how these efforts could be enhanced and new mechanisms progressed to support the delivery of the Protect Duty; fourteen questions were presented to examine these themes.

Advice, guidance and support

Question forty-eight provided a range of mechanisms to provide advice, types of information and tools that could assist organisations in complying with the Protect Duty and asked which they considered would be most helpful.

<i>Q48. What would you find most useful to help you to comply with a Protect Duty?</i>	Percentage of respondents that felt measure would be useful in assisting compliance (%)
Total respondents: 1083	
A single, digital service where you could access relevant material, advice and training in one place	74%
A risk assessment template	73%
Information on undertaking a risk assessment for terrorism threats	62%
Easy to digest information regarding threat and attack methodologies	62%
Advice on what constitutes reasonably practicable and appropriate mitigations appropriate for my circumstances	61%
Staff training and awareness courses	60%
Advice relating to how an organisation can prepare for terrorism attack	55%
Advice relating to protective security mitigations	54%
E-learning products	54%
Advice relating to personnel and people security	53%

Additionally, there was an option to provide a response through free text. The following were the most consistently grouped responses considered helpful to assist compliance:

- Organisation-specific guidance
- Support from local Police; and

- Funding to implement the Duty

Questions fifty-six¹³ and fifty-seven¹⁴ asked participants what advice and support would be required for those responsible for organisations and venues within the scope of Protect Duty, and those potentially involved in partnership-working at public spaces.

Some of the most prevalent themes included:

- Ensuring advice is sector-specific and not designed to encapsulate all. Places of Worship, voluntary organisations and smaller businesses operating within the same venue were all highlighted as particularly important examples of where specific advice would be required for users.
- A strong focus on clarity, with clear detailed guidance to be available for all. This also extends to roles and responsibilities, ensuring that expectations for responsible people are well-defined, especially in relation to those operating across public spaces or with multiple parties. Some referenced who should be providing expert security advice with the most referenced being security industry experts, Counter Terrorism Security Advisors and the Police.
- Communication was seen as an issue of strong significance, with the suggestion that there should be dedicated points of contact for those in scope. This aligns with a strong response regarding the importance of engaging on a local level with invested parties including the Police, Local Authorities and the private security sector.
- Developing security awareness and understanding through a variety of easily accessible formats such as advertising campaigns, posters, briefings, newsletters and online forums.
- Providing adequate funding and resources where there is a potential impact to sector-specific organisations such as Places of Worship or voluntary organisations and also for those potentially supporting the Duty, such as Police and Local Authorities.
- The importance of information-sharing was highlighted, including the circulation of best practice nationally and internationally. Respondents requested that any information provided was regularly reviewed and updated. Additional significance was placed at a local level with regards to the benefits of Business Improvement Districts and Local Resilience Forums.

¹³ Total respondents: 1185

¹⁴ Total respondents: 1185

- Considering flexible training such as classroom, practical and online, especially directed at sites or locations which may need bespoke material, such as Places of Worship and voluntary or community organisations. Risk assessments were the most prominently mentioned product that required additional training and support.

Other less mentioned considerations included:

- Guidance regarding physical security measures, in particular, CCTV
- Additional manpower to support those in scope, predominantly Counter Terrorism Security Advisors and Police
- Further support with risk assessments and the compliance process, ensuring enough time is granted for organisations to implement policies and plans; and
- Ensuring advice is regular, consistent and realistic (including information on threat levels).

To assess the uptake and value of the advice currently provided by Government on protective security, preparedness, and threats, question forty-five asked respondents that operate or own organisations or venues if they accessed such material.

<p><i>45. Do you currently access Government advice (primarily from Counter Terrorism Policing and the Centre for the Protection of National Infrastructure) regarding threat, protective security and preparedness?</i></p> <p>Total respondents: 1083</p>	Yes	No
	55%	45%

For the 55% of respondents to question forty-five that indicated they do access Government advice, the following were cited as the most valuable aspects provided and utilised:

- Counter Terrorism Security Advisors
- Threat levels, and general, current, local and specific attack methodologies
- Government training and advice products with ACT, “Run Hide Tell” and PREVENT highlighted; and
- Government departments including CPNI and NaCTSO

Other, valued considerations were:

- The circulation of intelligence
- Accessibility of information
- Venue and event support
- Direct updates through messages or internet; and

- Publicly Accessible Locations guidance, formerly Crowded Places guidance.

For those that do not currently access government advice, 26% stated they did not know it existed, 24% did not feel that they needed to address the threat, 9% did not have the time to access the material and 4% found it too confusing. From those who opted to provide their own response, the most common thoughts were that the risks were deemed minimal, that they used other sources instead, or that they did not feel that the advice and guidance currently provided was useful.

Working Together

Question fifty-eight¹⁵ gave participants in the consultation the opportunity to provide their input as to how Government could best support compliance with the Duty. The primary theme in response to this question centred on resourcing and where finances should be directed. The most mentioned organisations were the Emergency Services, Local Authorities, Local Resilience Forums, Security Services and the Police.

Other themes which were recurring throughout responses from Section 4 included a need for:

- Clear, personalised advice and guidance from one source
- Training for those in scope, and those enforcing the Duty, through qualified professionals from multiple agencies at nil cost; and
- Giving local organisations an opportunity to be heard with sufficient time and support to complete risk assessments appropriately.

Expanding on the topic of working together, the consultation sought views on the role that local business partnerships (such as Business Improvement Districts, Local Enterprise partnerships, etc.) could have in supporting organisations and venues to deliver improved security through question fifty-three¹⁶; 83% of respondents to this question championed the role of local business partnerships in this role, with the importance of collaboration between invested parties highlighted as the most prominent response. Other suggestions as to what role local business partnerships could play in support included:

- Co-ordinating risk management
- Arranging meetings and forums
- Providing localised knowledge
- Supporting and encouraging organisations both within and outside the Protect Duty scope

¹⁵ Total respondents: 483

¹⁶ Total respondents: 961

- Communicating and liaising, particularly online, with all invested local stakeholders; and
- Developing localised policies and action plans.

For the 17% that disagreed that local business partnerships could play a supporting role, a suggested lack of expertise was the main reason provided. Additionally, some respondents considered that this was not an appropriate role for such partnerships in terms of responsibility and should sit with the Police or Local Authorities.

Improvements to security consciousness and culture

Question fifty-two¹⁷ asked respondents to give their opinion on how they would like to access information about countering terrorism and working with other local partners in the future.

The key response to this question revolved around engagement with relevant groups, meetings or forums, which can make an impact at local, regional and national levels, with the most suggested being:

- Local Resilience Forums
- Community Safety Partnerships
- Community Security Zones; and
- CONTEST Boards.

The following actions were noted as the most beneficial to developing and improving such groups generally:

- Greater engagement and collaboration with those participating, in particular by the Police
- Counter terrorism simulated exercises
- An increase in general funding; and
- Additional Police and security staff.

In other responses to question fifty-two, many respondents identified the importance of accessing information, which is user-friendly, current, online and found in one location. Additional proposals provided by smaller groups of respondents included being able to access:

- A portal offering risk assessments
- An application, with reference made to ACT

¹⁷ Total respondents: 461

- Traditional methods of communication including advertisements, e-mails, educational videos, a telephone helpline; and
- A point of contact for reporting incidents, potentially within an enforcement agency.

A new digital service is being developed by Counter Terrorism Policing, the Government and the Private Sector to provide access to relevant counter terrorism material, advice and training in one place for organisations operating in publicly accessible locations. Question forty-nine¹⁸ sought views on whether respondents would use this service, and 78% of all respondents to this question (and 82% of those responsible for security at publicly accessible location) anticipated that they would do so. Those that stated that they would not use the service felt that the risk was currently minimal and less relevant when considering rural areas.

For those who stated that they would use the service and are responsible for security for publicly accessible locations:

- 73% would do so for updates on the emerging terrorist threats
- 65% would do so to understand what risk management activities are required
- 55% would do so to access counter terrorism training
- 53% would do so to report suspected terrorist activity or concerns; and
- 49% would do so to understand what to do after an incident.

Question fifty-five¹⁹ sought feedback from respondents with regards to measures that the Government could consider to support the provision of high-quality advice and guidance by private sector security professionals. The main suggestions were:

- 57% support government standards for counter terrorism risk assessments and advice
- 53% support accredited training and qualifications for individual security professionals
- 46% support the regulation of counter terrorism consultants; and
- 44 % support a Government-regulated “approved contractors’ scheme.”

Respondents were given the opportunity to provide a free text comment through question fifty-four²⁰ as to what measures the Government could consider to incentivise and encourage further security considerations within organisations. Prevalent themes (consistent with other responses throughout the consultation) were on providing advice and information, better engagement and communication, and increased collaboration and co-

¹⁸ Total respondents: 2341

¹⁹ Total respondents: 1083

²⁰ Total respondents: 1150

ordination. In terms of specific and tangible incentives, the following were the most popular with those responding:

- Additional funding and resources, including for CTAs, Emergency Services and Local Authorities as recipients
- An accreditation scheme or reward system
- Discounts on business rates, taxes and insurance
- Locally available, free of cost support
- Low-cost, targeted training, including security staff, the Security Industry Authority and the Police as recipients; and
- A rating system made available to the public for review.

ANNEX A – ADDITIONAL CONSULTATION EVENT ISSUES

Additional points raised at consultation events, included:

- Should the Duty apply not only to the venue (within the threshold), but also to footprint just outside of the venue?
- How would the Duty apply to multi use commercial centres (e.g., retail, office and residential)?
- How would the Duty relate to events at public spaces organised by third parties, and where there may not be ticketing or a means to control access?
- Where locations involve multiple interested parties, how will legislation require those parties to work together, and deal with differing views on reasonably practicable mitigations?
- How would the Duty deal with franchisees, concessions staff, and tenants/leaseholders?
- Would an organisational component (organisations employing 250 staff or more) be fair and achieve the desired consistency and effective outcomes sought (e.g., applying to a large chain coffee shop, but not the same sized independent shop next door)?
- Would requirements be placed on UK organisations operating overseas?
- Could a Duty lead to less willingness to open up venues and spaces for public usage?
- Would the Duty define terrorism and terrorism acts, and what would this mean for incidents motivated by other causes, but which had similar outcomes and potentially revealed deficiencies in security considerations?
- Is there a risk of displacement of attack targets from those in scope to those out of scope?
- Will the Duty be mandated as part of the design and planning for new public realm developments and significant refurbishments?
- Should the Duty be linked to broader considerations than terrorism, for example to encourage greater resilience, cyber security and crime prevention?

GLOSSARY

Table 1: Glossary of terms used in the Protect Duty Consultation

<p>Attack methodologies</p>	<p>Different methods of attack used by terrorists. These have recently included attacks in the UK and Europe involving the use of Person Borne Improvised Explosive Devices (IEDs), postal IEDs, Vehicle As a Weapon, bladed weapons and firearms.</p>
<p>Action Counters Terrorism (ACT)</p>	<p>A national awareness scheme to protect buildings, business areas and their surrounding neighbourhoods from the threat of terrorism.</p>
<p>CT Awareness e-Learning</p>	<p>A nationally recognised corporate CT guidance product, developed by Counter Terrorism Policing, to help people better understand, and mitigate against, current terrorist methodology. It is available to all organisations, their staff and the general public. https://www.gov.uk/government/news/a-ct-awareness-elearning</p>
<p>Centre for the Protection of National Infrastructure (CPNI)</p>	<p>The UK Government's National Technical Authority for Physical and Personnel Protective Security. CPNI's produce authoritative guidance and advice based on detailed Physical and Personnel security research and development programmes.</p>
<p>Counter Terrorism Security Advisors (CTSAs)</p>	<p>Individuals who work within local police forces as officers and staff. Their primary role is to provide help, advice and guidance on all aspects of counter</p>

	terrorism protective security to industry sectors and others.
Large organisations	Organisations with 250 or more employees.
National Counter Terrorism Security Office (NaCTSO)	A police unit that supports the 'Protect and Prepare' strands of the Government's counter-terrorism strategy.
Public Venues	In the Protect Duty context these are permanent buildings (e.g., entertainment and sports venues) or temporary event locations (such as outdoor festivals) where there is a defined boundary and open access to the public.
Public Spaces	These are open public locations which usually have no clear boundaries or well-defined entrances / exit points 37 (e.g., city centre squares, bridges or busy thoroughfares, parks, and beaches).
Publicly Accessible Location	Any place to which the public or any section of the public has access, on payment or otherwise, as of right or by virtue of express or implied permission. Publicly accessible locations include a wide variety of everyday locations such as: sports stadiums; festivals and music venues; hotels; pubs; clubs; bars and casinos; high streets; retail stores; shopping centres and markets; schools and universities; medical centres and hospitals; places of worship; Government offices; job centres; transport hubs; parks; beaches; public

	squares and other open spaces. This list is not exhaustive.
Reasonably practicable (mitigations)	Requires owners/operators to weigh a risk against the effort, time and money needed to mitigate it.
Run, Hide, Tell	A Counter Terrorism Policing campaign which provides guidance on steps for keeping safe in the event of a firearms or weapons attack.
See, Check and Notify (SCaN)	Training which aims to help businesses and organisations maximise safety and security using their existing resources. It empowers staff to correctly identify suspicious activity and know what to do when they encounter it. It helps ensure that individuals or groups seeking to cause your organisation harm are unable to get the information they need to plan their actions.
See It. Say It. Sorted.	A Government campaign to encourage train passengers and station visitors to report any unusual items or activity