

30 June 2021

Protect Duty consultation
Protect and Prepare
5th Floor NE, Peel Building
Office for Security and Counter Terrorism
Home Office
2 Marsham Street
London
SW1P 4D

By email: ProtectDuty@homeoffice.gov.uk

Dear Sirs

[Institute of Licensing response to Home Office consultation re the proposed Protect Duty](#)

The Institute of Licensing (IoL) is the professional body for licensing practitioners, representing regulators (local authority and police), private practice and industry practitioners across the UK. We are pleased to have the opportunity to respond to the consultation, particularly in the light of the recent publication of the first volume of the Manchester Arena Inquiry, which the IoL assisted with in relation to matters relating to the Licensing Act 2003.

Institute of Licensing members have been surveyed to gather views in relation to the Protect Duty consultation. The results of that survey are attached for your attention. We expect that many of our members will have made their own response direct to the Home Office, which is reflected by the relatively low number of survey responses received. That said, the last 12 months have been extremely testing and demanding for all our members in all sectors as a result of the challenges of the COVID-19 pandemic, and the rapidly changing regulatory landscape across licensed sectors, particularly within the licensed hospitality, entertainment and retail sectors.

The general consensus (with exceptions) from our members is supportive of a Protect Duty, and the need for venues and organisations responsible for or utilising public locations to be aware of, to adequately risk assess and finally to be able to respond appropriately to the threat of a terrorist attack. Most supported the use of capacity to determine those venues to which the Protect Duty should apply, as this would appear to be the most consistent and readily understood of the possible criteria that could be applied. The suggested threshold of 100 as the venue capacity is generally supported although there were some suggestions that this figure could be higher.

When considering the local authority functions which have the potential to result in the best protective security and organisational preparedness outcomes at public spaces, responses acknowledge that the

licensing function (including sports grounds licensing) is one which should be considered, alongside Health and Safety, fire safety and building control processes, Safety Advisory Groups (for event planning), and Local Resilience Forums.

The Institute of Licensing would be keen to work with Home Office officials in discussing and developing the Protect Duty proposals and considering how those duties might work within the licensing regime and other local authority functions. We are fortunate to have extremely experienced expert practitioners within our membership, from regulatory and industry sectors, as well as within venue management, and event planning and organisation fields. In addition, our membership includes the leading licensing lawyers in the field, who between them have very many decades experience of the practical application of similar provisions and the possible legal pitfalls to be avoided.

Please do not hesitate to contact us in relation to this response and any questions or discussion points which we may be able to assist with.

Yours faithfully



Sue Nelson
Executive Officer.

Protect Duty Consultation - IoL member survey Report

2. About you

3. What region are you based in?				Response Percent	Response Total
1	East Midlands	<input type="checkbox"/>		5.56%	1
2	Eastern	<input type="checkbox"/>		5.56%	1
3	Home Counties			0.00%	0
4	London	<input type="checkbox"/>		38.89%	7
5	Northern Ireland			0.00%	0
6	North East			0.00%	0
7	North West	<input type="checkbox"/>		16.67%	3
8	Scotland			0.00%	0
9	South East	<input type="checkbox"/>		11.11%	2
10	South West			0.00%	0
11	Wales	<input type="checkbox"/>		5.56%	1
12	West Midlands	<input type="checkbox"/>		16.67%	3
				answered	18
				skipped	0

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

4. 1. To what extent do you agree or disagree with the following statement: 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				Response Percent	Response Total
1	Strongly Disagree	<input type="checkbox"/>		11.11%	2
2	Disagree	<input type="checkbox"/>		5.56%	1
3	Neither Agree nor Disagree	<input type="checkbox"/>		5.56%	1
4	Agree	<input type="checkbox"/>		44.44%	8
5	Strongly Agree	<input type="checkbox"/>		33.33%	6
				answered	18
				skipped	0

5. 2. To what extent do you agree or disagree with the following statement: 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

			Response Percent	Response Total
1	Strongly Disagree	<input type="text"/>	11.11%	2
2	Disagree		0.00%	0
3	Neither Agree nor Disagree		0.00%	0
4	Agree	<input type="text"/>	38.89%	7
5	Strongly Agree	<input type="text"/>	50.00%	9
			answered	18
			skipped	0

6. 3. 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 ?

			Response Percent	Response Total
1	a. Capacity (as currently used in Fire Safety Regulations)	<input type="text"/>	66.67%	12
2	b. Annual revenue		0.00%	0
3	c. Staffing levels		0.00%	0
4	d. Other (max 100 words):	<input type="text"/>	33.33%	6
			answered	18
			skipped	0

d. Other (max 100 words): (6)

1	I believe that every premises in the hospitality industry should have a process in place that would address issues surrounding searching and identification of suspicious persons/devices. Part of a unique process that I use as a violence reduction measure includes this.
2	High profile/prominence of venue
3	All venues should be covered irrespective of size capacity etc.
4	Should be subject to risk assessment per venue based on type of attraction / location / demographic, etc. To be assessed by the venue and emergency services in co-operation.
5	None, what is the point of having a Police Force with their own experts in this field. Once again everything is being put onto the Licensing trade to Police and Protect the public whilst the Police are sat in offices - shocking!
6	High Profile/Prominence of venue

Comments: (6)

6. 3. 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 ?

		Response Percent	Response Total
1	CAPACITY DETERMINES THE SIZE OF THE PUBLIC VENUE. THIS IS MORE APPLICABLE SINCE IT WILL REFLECT ON STAFFING LEVELS TO MAINTAIN THE PUBLIC SAFETY WHILE THEY ARE INSIDE THE VENUE. LICENCED PREMISES HAVE A DUTY FOR PUBLIC SAFETY AND THERE IS NO REASON WHY TERRORIST THREAT SHOULD NOT BE ANY DIFFERENT THAN CONSIDERATIONS GIVEN TO PROTECTION OF PUBLIC THROUGH FIRE SAFETY OR FOOD SAFETY. THIS APPROACH WILL ALSO ENSURE THAT LICENSED PREMISES THAT HAVE CAPACITY LESS THAN 5-10 WILL PROBABLY FIND IT EASIER TO MANAGE THE RISK OF TERRORIST THREAT ON THEIR PREMISES UNLESS THEY ARE LOCATED IN AN AREA WHICH CARRIES HIGHER RISKS OF THREAT.		
2	Plus capacity		
3	Used in Fire safety Reg, so this should just become the norm.		
4	Those venues that attract a large capacity i.e Music, Concert Halls, where large capacities of persons are known.		
5	If only certain venues are covered by a Protect Duty then this would create "soft targets" with other venues and shift the target accordingly.		
6	And capacity		

7. If you answered (a) to Question 3:4. We have proposed a venue capacity of 100 persons or more as a threshold. What capacity level do you think would be appropriate to determine venues in scope of the Duty?

		Response Percent	Response Total
1	Open-Ended Question	100.00%	14

7. If you answered (a) to Question 3:4. We have proposed a venue capacity of 100 persons or more as a threshold. What capacity level do you think would be appropriate to determine venues in scope of the Duty?

		Response Percent	Response Total
1	CAPACITY NUMBER IS MORE RELEVANT IN CONNECTION WITH LICENSABLE ACTIVITY - ESPECIALLY THE PROVISION OF REGULATED ENTERTAINMENT. THIS MUST TAKE PRIORITY. THEN IF OTHER TWO LICENSABLE ACTIVITIES ARE ALSO LICENSED (ALCOHOL & FOOD) THEN THE DUTY BECOMES A MUST. THE NEXT CATEGORY IS LICENSED PREMISES WITH FOOD & ALCOHOL (WHICH CAN BE BASED ON CAPACITY) AND THE FINAL CATEGORY IS JUST ALCOHOL RETAIL FOR CONSUMPTION OFF THE PREMISES.		
2	Probably ok		
3	100		
4	100		
5	Threshold scope should start at 500 this is to avoid punitive requirements for small operators.		
6	100		
7	Agree with 100 plus		
8	General duties on venues with capacity <100 eg awareness raising, duty to liaise with others, including enforcement agencies. More prescriptive duties for >100 capacity		
9	Agree 100		
10	I would have thought higher than this, say 250?		
11	I think 100 would be an appropriate threshold.		
12	500		
13	100 may be a figure to work from a targeted Protect Duty but all staff - regardless of the size of a venue - should be at least trained or made aware of how to react in such situations		
14	100		
		answered	14
		skipped	4

8. If you answered (b - d) to Question 3.5. What threshold would you propose for inclusion in the scope of the Protect Duty for this criterion?

		Response Percent	Response Total
1	Open-Ended Question	100.00%	3
1	TO ME THIS IS NOT RELEVANT AND WOULD BE SEEN AS ARBITORY - NOT PROPORTIONATE AND RELEVANT APPROACH TO CONDITIONS APPLIED		
2	Any premises operating during the night time economy as a hospitality venue		
3	Wherever the public have access irrespective of size or capacity		
		answered	3
		skipped	15

9. 6. 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?

			Response Percent	Response Total
1	Yes	<input type="text"/>	94.44%	17
2	No	<input type="checkbox"/>	5.56%	1
			answered	18
			skipped	0

10. 7. If you answered @SQ@No@SQ@ to Question 6, please explain why not:(max 100 words)

			Response Percent	Response Total
1	Open-Ended Question		100.00%	1
1	Difficult. Cannot answer "Yes" as it assumes the owner/operator has all available expertise in order to implement "appropriate" mitigations. In essence I agree - Yes - but not to the extent that they would fail in ignorance.			
			answered	1
			skipped	17

11. 8. 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?

			Response Percent	Response Total
1	Yes	<input type="text"/>	94.44%	17
2	No	<input type="checkbox"/>	5.56%	1
			answered	18
			skipped	0

12. 9. If you answered @SQ@no@SQ@ to Question 8 please explain why not:(max 100 words)

			Response Percent	Response Total
1	Open-Ended Question		100.00%	1
1	I beleive that shared responsibility is no responsibility at all. Responsibility should be placed on the person/company who are the prime operator at the venue/location.			
			answered	1
			skipped	17

13. 10.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?

		Response Percent	Response Total
1	a. All organisations	55.56%	10
2	b. Micro (1-9 employees) and above	0.00%	0
3	c. Small (10-49 employees) and above	5.56%	1
4	d. Medium (50-249 employees) and above	5.56%	1
5	e. Large (250+ employees)	22.22%	4
6	f. Other (max 100 words):	11.11%	2
		answered	18
		skipped	0
f. Other (max 100 words): (2)			
1	Would prefer >5 employees as this is consistent with Health and Safety at Work Act duty to record risk assessments		
2	None - I agree with staff training and venue mitigation to prevent attack however we already pay vast sums of money for the Police to sit in offices when they should be visible and protecting the public.		

14. 11.What is your reasoning for your answer to Question 10?

		Response Percent	Response Total
1	Open-Ended Question	100.00%	18

14. 11.What is your reasoning for your answer to Question 10?

		Response Percent	Response Total
1	THIS WOULD TAKE CARE OF AREA LOCATION WHERE MULTIPLE OPERATORS ARE INVOLVED E.G. TRAIN STATIONS OR SHOPPING MALLS. EACH ONE HAS THE DUTY TO SHARE COLLECTIVELY		
2	Trying to keep it reasonable. Below 50 employees most people will be known to one another and outsiders would stand out.		
3	I believe that acts of terror are not limited to any particular venue or the size of the premises that they operate therefore, safety/security measures should be introduced at all relevant premises.		
4	Available resources and potentially more risk of threat		
5	Because all employers have a duty of care regardless of the size so they should all have some awareness regarding the duty to protect.		
6	To reduce the potential burden for small and medium sized businesses.		
7	Staff Training and the need for this to be covered at both small and large premises.		
8	All public venues should have the Duty. To leave some out would increase the risk for the public. Cover everything and then there will not be gaps and confusion. All or nothing		
9	Any event which allows public access either free or paid, has a duty to ensure there are policies and procedures in place to ensure the safety of the public.		
10	Would prefer >5 employees as this is consistent with Health and Safety at Work Act duty to record risk assessments		
11	If your Organisation wishes to run an event then your Organisation should take some of the responsibility for the protection of persons attending the event		
12	To avoid soft targets being created.		
13	High capacity places are the moat at risk, but also included should be specified high profile buildings of lower capacity.		
14	I think this is an appropriate threshold and will reflect the size / capacity of the business.		
15	The duty should be based on the number of people attending the event/venue, not on who is organising the event. The risk is the same regardless.		
16	Money and it is the role and responsibility of the Police and if I am wrong then why have a Police Force?		
17	Regardless of the size of the venue within the area it is surely in everyone's interest that all staff undergo at least some training to make them prepared for such situations		
18	Available resources and potentially more risk of threat		
		answered	18
		skipped	0

15. 12.We have proposed a Protect Duty would apply to organisations with 250 or more employees. Is it clear as to whether your organisation falls within this criteria?

		Response Percent	Response Total
1	Yes	<input type="text" value="88.89%"/>	16
2	No	<input type="text" value="11.11%"/>	2
		answered	18
		skipped	0

16. 13.If you answered @SQ@no@SQ@ to Question 12, why not?(max 100 words)				
			Response Percent	Response Total
1	Open-Ended Question		100.00%	2
1	AGAIN ARBITRARY THE COLLECTIVE RESPONSIBILITY CAN BE PROPORTIONATE APPLIED ON STAFFING LEVEL OR THE TURNOVER OR BOTH THAT IS MORE FAIRER			
2	Warwick District employs far more than 250 employees, but most of us have nothing to do with the Spa Centre. The duty should apply to the event or to the venue (based on capacity/attendance) - anyone can hire a public space for almost any purpose employing 10 people doesn't reduce the risk.			
			answered	2
			skipped	16

17. 14.Are you clear about whether your organisation falls within the scope of the definition of a 'publicly accessible location' (a 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)?				
			Response Percent	Response Total
1	Yes	<input type="text"/>	100.00%	18
2	No	<input type="text"/>	0.00%	0
			answered	18
			skipped	0

18. 15. If you answered @SQ@no@SQ@ to Question 14, why not?(max 100 words)				
			Response Percent	Response Total
1	Open-Ended Question		0.00%	0
No answers found.				
			answered	0
			skipped	18

19. 16.Referring to Annex 1, do you consider that there should be other exemptions from a Protect Duty?				
			Response Percent	Response Total
1	Yes	<input type="text"/>	31.25%	5
2	No	<input type="text"/>	68.75%	11
			answered	16
			skipped	2

20. 17.If you answered @SQ@yes@SQ@ to Question 16, please detail what or who and why? (max 200 words)				
			Response Percent	Response Total
1	Open-Ended Question		100.00%	4
1	Spaces under certain sq/m (e.g. small but publicly accessible parks)			
2	Answered Yes because I haven't seen Annex 1 and cannot appropriately respond.			
3	There should not be a Protect Duty it's scandalous!			
4	Spaces under a certain sq/m area (e.g. small but publicly accessible park)			
			answered	4
			skipped	14

21. 18.Are there any other issues regarding who legislation should apply to that you would like to offer views on?(max 200 words)				
			Response Percent	Response Total
1	Open-Ended Question		100.00%	3
1	MULTIPLE LICENSED PREMISES OR OTHER BUSINESSES THAT ARE LOCATED IN A SINGLE PUBLIC ASSESSIBLE AREA MUST ALL SHARE THE DUTY ALONG WITH RESPONSIBLE AUTHORITIES IN A JOINT APPROACH			
2	The definition of who needs to be carefully worded to ensure it provides a distinct, clear and unambiguous description of who legislation should apply to.			
3	I cannot believe that we are asking organisations and businesses to pay yet more money on top of the bills that they are already struggling to cope with.			
			answered	3
			skipped	15

4. Section 2: What should the requirements be?

22. 19.Does your organisation currently undertake a risk assessment for terrorism?				
			Response Percent	Response Total
1	Yes	<input type="text"/>	77.78%	7
2	No	<input type="text"/>	22.22%	2
			answered	9
			skipped	9

23. [Linked to Question 19]20.Is this process undertaken by an in-house or an externally appointed individual?				
			Response Percent	Response Total
1	In house	<input type="text"/>	57.14%	4

23. [Linked to Question 19]20.Is this process undertaken by an in-house or an externally appointed individual?				
			Response Percent	Response Total
2	External	<input type="text"/>	42.86%	3
			answered	7
			skipped	11

24. [Where 19 = Yes]21.When you do undertake a terrorism risk assessment, how many working days a year do you estimate your organisation typically spend on this task? (Where this is undertaken by multiple staff, please include total days spent by all staff)?(max 100 words)				
			Response Percent	Response Total
1	Open-Ended Question		100.00%	4
1	1			
2	This is carried out weekly depending on the current threat assessment from the government but non intrusive searching is done at every event.			
3	National threat Risk/level - we also have individual risk assessments depending on circumstances. Externally we get SECCO reports and operation orders. We adapt our way of working for any increased risks such as major events/significant events and we will carry out additional risk assessment where required.			
4	Not Known			
			answered	4
			skipped	14

25. 22.How frequently does your organisation typically review this risk assessment?				
			Response Percent	Response Total
1	a. Multiple times per year	<input type="text"/>	25.00%	2
2	b. Around once per year		0.00%	0
3	c. Around once every 2 years	<input type="text"/>	12.50%	1
4	d. Around once every 3 or more years		0.00%	0
5	e. Other (please specify)	<input type="text"/>	62.50%	5
			answered	8
			skipped	10
e. Other (please specify) (5)				

25. 22.How frequently does your organisation typically review this risk assessment?			Response Percent	Response Total
1	THE ASSESSMENT SHOULD BE CARRIED OUT WITH THE POLICE WHO CAN PROVIDE MORE GUIDANCE ON THE POTENTIAL THREAT			
2	unknown			
3	In line with national intel/threat risk review			
4	Not Sure not my area			
5	Unknown			

26. 23.What mitigations against terrorism risks does your organisation currently undertake (select all that apply)?			Response Percent	Response Total
1	a. Well defined organisational security protocols and procedures, including for response to terrorist attack	<input type="checkbox"/>	55.56%	5
2	b. Measures are in place to spot and disrupt hostile reconnaissance	<input type="checkbox"/>	44.44%	4
3	c. Work to ensure security behaviours are adopted by the workforce	<input type="checkbox"/>	77.78%	7
4	d. Personnel security policies and procedures consider security risks	<input type="checkbox"/>	44.44%	4
5	e. Site/location vulnerabilities (to terrorist threats) and appropriate physical mitigations are considered	<input type="checkbox"/>	44.44%	4
6	f. Evacuation, invacuation, lockdown procedures are in place and are understood and exercised by staff	<input type="checkbox"/>	55.56%	5
7	g. Staff training is undertaken to raise awareness of the threat and what to do	<input type="checkbox"/>	77.78%	7
8	h. Business continuity procedures or app (e.g. ACT app) include information on how to respond to attacks	<input type="checkbox"/>	33.33%	3
9	i. Liaison with police or other resource (e.g. security consultant) on threats and appropriate security measures	<input type="checkbox"/>	77.78%	7
10	j. Involved in local security initiatives	<input type="checkbox"/>	55.56%	5
11	k. Other (please specify):	<input type="checkbox"/>	11.11%	1
			answered	9
			skipped	9
k. Other (please specify): (1)				

26. 23.What mitigations against terrorism risks does your organisation currently undertake (select all that apply)?			Response Percent	Response Total
1	This is answered from a policing perspective.			

27. 24.How much money does your organisation typically spend on new or revised security measures that would mitigate against terrorist risks in one financial year?(max 100 words)			Response Percent	Response Total
1	Open-Ended Question		100.00%	4
1	£0			
2	£1000 plus			
3	A substantial amount of the police budget goes towards this each year.			
4	Not Known			
			answered	4
			skipped	14

28. 25.What are the existing activities and mechanisms which you consider result in the best protective security and organisational preparedness outcomes at public spaces (select all that apply)?			Response Percent	Response Total
1	a. Communications campaigns e.g. Action Counters Terrorism and See It, Say It, Sorted	<input type="text"/>	55.56%	5
2	b. Staff awareness raising and training courses	<input type="text"/>	66.67%	6
3	c. Advice and guidance products and tools	<input type="text"/>	22.22%	2
4	d. Local authority mechanisms and processes	<input type="text"/>	55.56%	5
5	e. Other (please specify):	<input type="text"/>	33.33%	3
			answered	9
			skipped	9
e. Other (please specify): (3)				
1	Liaison with MPS CTSA, partnerships with business sectors			
2	Organisational learning, casino & beach learning and information sharing in preparedness and planning. Linking of businesses and other agencies, sharing best practice, open lines of communication. Pub Licensee WhatsApp Groups and Pubwatch Groups.			
3	Liaison with MPS CTSA, partnerships with business sectors			

29. 26.What are the existing local authority functions which currently result in the best protective security and organisational preparedness outcomes at public spaces? (select all that apply)

			Response Percent	Response Total
1	a. CONTEST and Protect Boards	<input type="checkbox"/>	22.22%	2
2	b. Community Safety Partnerships	<input type="checkbox"/>	66.67%	6
3	c. Licensing for sports grounds safety	<input type="checkbox"/>	55.56%	5
4	d. Planning processes	<input type="checkbox"/>	33.33%	3
5	e. Local Resilience Forums	<input type="checkbox"/>	88.89%	8
6	f. Safety Advisory Groups (for events)	<input type="checkbox"/>	77.78%	7
7	g. Business Improvement Districts (which can be set up by Local Authorities, businesses or individuals to benefit local businesses)	<input type="checkbox"/>	55.56%	5
8	h. Licensing Committees (for the sale and supply of alcohol, the provision of late-night entertainment and refreshment)	<input type="checkbox"/>	33.33%	3
9	i. Health and Safety, fire safety and building control processes.	<input type="checkbox"/>	66.67%	6
10	j. Other (max 100 words):		0.00%	0
			answered	9
			skipped	9
j. Other (max 100 words): (0)				
No answers found.				

30. 27.What are the existing local authority functions which have the potential to result in the best protective security and organisational preparedness outcomes at public spaces? (select all that apply)

			Response Percent	Response Total
1	a. CONTEST and Protect Boards	<input type="checkbox"/>	22.22%	2
2	b. Community Safety Partnerships	<input type="checkbox"/>	66.67%	6
3	c. Licensing for sports grounds safety	<input type="checkbox"/>	77.78%	7
4	d. Planning processes	<input type="checkbox"/>	55.56%	5
5	e. Local Resilience Forums	<input type="checkbox"/>	66.67%	6
6	f. Safety Advisory Groups (for events)	<input type="checkbox"/>	88.89%	8
7	g. Business Improvement Districts (which can be set up by Local Authorities, businesses or individuals to benefit local businesses)	<input type="checkbox"/>	33.33%	3

30. 27.What are the existing local authority functions which have the potential to result in the best protective security and organisational preparedness outcomes at public spaces? (select all that apply)				
			Response Percent	Response Total
8	h. Licensing Committees (for the sale and supply of alcohol, the provision of late-night entertainment and refreshment)	<input type="checkbox"/>	55.56%	5
9	i. Health and Safety, fire safety and building control processes.	<input type="checkbox"/>	55.56%	5
10	j. Other (max 100 words):		0.00%	0
			answered	9
			skipped	9
j. Other (max 100 words): (0)				
No answers found.				

31. [Linked to Question 27]28.For your preferred option/s what would be required to improve or support this/these to realise more effective security outcomes?(max 100 words)				
			Response Percent	Response Total
1	Open-Ended Question		100.00%	5
1	JOINT PARTNERSHIP APPROACH THAT TAKES INTO ACCOUNT DIVERSIFIED COMMUNITY MEMBERS, RANGE OF LICENSED PREMISES OPERATORS, POLICE, FIRE, PUBLIC HEALTH (NHS HOSPITALS) AND COUNCIL AUTHORITIES. THE FORUM HAS RESPONSIBILITY TO DETERMINE THE EFFECTIVE SECURITY OUTCOMES AND GUIDE THE LICENSED PREMISES AND OTHER BUSINESSES BY WARDS OR CIP, ETC			
2	A better understanding of terror tactics and and awareness for all staff to take it seriously			
3	Staff and members training			
4	Makes CT a part of daily business.			
5	Staff and member training			
			answered	5
			skipped	13

32. 29.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?(max 100 words)				
			Response Percent	Response Total
1	Open-Ended Question		100.00%	6

32. 29.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?(max 100 words)

		Response Percent	Response Total
1	THESE SHOULD BE INCLUDED IN THE ABOVE FORUM WHERE IT APPLIES - ESPECIALLY DOOR OR ENTRY SUPERVISORS		
2	Often it is the case that the Police officers involved have very little or no knowledge of the subject matter. There should be specifically trained officers and an appointed person at each premises to develop this		
3	through the BID, or through mandating via licenses liaising with police counter-terrorism advisors if a venue / business is of a particular size etc. Make it a mandatory condition of their licence, planning approval, contract or permission (as applicable)		
4	CCTV and mandatory conditions on premises licences to deal with terrorism threat. ESAG groups for events. Include in Event Management plans and also Business Improvement Districts (BIDS)		
5	Regulation requirement (Statutory Duty)		
6	Through the BID, or through mandating via licenses liaising with police counter-terrorism advisors if a venue / business is of a particular size etc. Make it a mandatory condition of their licence, planning approval, contract or permission (as applicable)		
		answered	6
		skipped	12

33. 30.What are your views on a potential legislative requirement for local authorities (and relevant public authorities such as Highways Agencies) and other relevant local partners to develop a strategic plan to combat terrorism, to ensure public security, through partnership working?(max 100 words)

		Response Percent	Response Total
1	Open-Ended Question	100.00%	4
1	SEE ANSWER 28		
2	Too many cooks is often the case with partnership working. Often authorities will engage early on but then their enthusiasm will wain causing the process to fall away.		
3	There should be a legislative requirement in place but who is responsible? Consider who should do it, could it be done in a shared manner such as in Cheshire all the Local Authorities work together collaboratively to ensure there's a consistent approach across the County.		
4	Supportive		
		answered	4
		skipped	14

34. [Linked to Question 30]31.What in your view would be the key components of such a legislative provision and associated guidance?(max 100 words)

		Response Percent	Response Total
1	Open-Ended Question	100.00%	5

34. [Linked to Question 30]31.What in your view would be the key components of such a legislative provision and associated guidance?(max 100 words)			
		Response Percent	Response Total
1	There would need to be a person who could 'own' this and then meet with specified persons on a regular basis.		
2	It would be a statutory duty to develop a strategic plan, requirement to consult with key stakeholders, regularly reviewed. Detailed guidance with case studies of good practice would be helpful.		
3	H&S/Terrorism Act - Communications between the agencies. Considered as part of building work and joint working groups. Risk Assessment, Active Security, Physical Security and Response. Recovery plans for larger organisations.		
4	Agree		
5	It would be a statutory duty to develop a strategic plan, requirement to consult with key stakeholders, regularly reviewed. Detailed guidance with case studies of good practice would be helpful.		
		answered	5
		skipped	13

35. [Linked to Question 30]32.What organisation/s could play a leading role in bringing together and convening such partnerships?(max 100 words)			
		Response Percent	Response Total
1	Open-Ended Question	100.00%	7
1	POLICE AUTHORITY		
2	Police/Fire/Ambulance/Local authority/Appointed persons from venues		
3	Local authority, police and security industry / sector.		
4	Local Authority resilience forum and police along with CT Security provision and licensing.		
5	Local Authority		
6	Emergency Planning co-ordinating the Local Resilience Forum partners		
7	Local authority, police and security industry / sector.		
		answered	7
		skipped	11

36. [Linked to Question 30]33. What requirements to improve protective security and preparedness could be realistically achieved by such partnerships?(max 100 words)			
		Response Percent	Response Total
1	Open-Ended Question	100.00%	4

36. [Linked to Question 30]33. What requirements to improve protective security and preparedness could be realistically achieved by such partnerships?(max 100 words)			Response Percent	Response Total
1	AWARENESS BUILDING, AND SUPPORT FOR MEASURES TO BE IMPLEMENTED BY LICENSED PREMISES			
2	Assessment of Risk, Training of staff so they have an awareness. Sign Post to guidance, CT act and business communications and co ordinating practice. Business continuity plans, Live communications, Intel Sharing, Risk levels - keeping contacts up to date, having a list of relevant contacts. What to do if see something out of the ordinary (Educate). People actively looking out for suspicious behaviour.			
3	Layout , Design and staff Training			
4	Current reach is high risk areas & venues- need to expand to cover lower risk areas			
			answered	4
			skipped	14

37. 34. Do you have any additional proposals to put forward which could improve security at public spaces?(max 100 words)			Response Percent	Response Total
1	Open-Ended Question		100.00%	2
1	I am an ex Police Officer with many skills in this area. People such as myself should be allowed to engage with such a project to develop it to an acceptable standard			
2	Appropriate training and run mock exercises of plan to determine what does/does not work. Proactive staff - challenge suspicious behaviour. Designing Out Crime Officers can help with plans when developing outside spaces to recommend and incorporate measures.			
			answered	2
			skipped	16

38. 35.Where there is an existing legislative requirement for security (e.g. at certain sports grounds and transport sites, or in future those organisations and venues subject to a Protect Duty), is it reasonable to require relevant organisations (for example those surrounding the site) to work in partnership to achieve security outcomes?(max 100 words)			Response Percent	Response Total
1	Open-Ended Question		100.00%	5
1	AGAIN PARTNERSHIP APPROACH WITH POLICE TAKING THE LEAD			
2	Not sure			
3	Yes			
4	Yes Comms is essential but also helps build a network of resilience.			
5	Yes			
			answered	5
			skipped	13

39. 36. Where there is currently Government security guidance (e.g. bus and coach operators and commercial ports and UK flagged ships) would it be appropriate for this guidance to become legislative guidance under the Protect Duty to achieve greater certainty on security considerations and outcomes?(max 100 words)

		Response Percent	Response Total
1	Open-Ended Question	100.00%	6
1	YES - THIS MUST BE MORE ENFORCEABLE RATHER THAN ASSUMED		
2	Yes		
3	Yes make the guidance ACOP's		
4	Yes - Make it mandatory to follow.		
5	Yes		
6	Yes make the guidance ACOP's		
		answered	6
		skipped	12

40. 37. Where Government has published security guidance (e.g. bus and coach operators and commercial ports and UK flagged ships) or put in place voluntary schemes for products that could be used as weapons, would it be reasonable for businesses and other operators responsible to be mandated to follow that guidance under a Protect Duty?(max 100 words)

		Response Percent	Response Total
1	Open-Ended Question	100.00%	6
1	YES		
2	Yes		
3	Yes		
4	Yes - any guidance or scheme should be mandated any business under the protect duty should be aware of it. This should be considered as a minimum.		
5	Yes		
6	Yes		
		answered	6
		skipped	12

41. 38. To what extent do you agree with the following statement: Compliance with a Protect Duty would require greater effort (e.g. time, staff resource) than compliance for comparable legal and other obligations (e.g. fire safety, health and safety, Licensing Act 2003 guidance, licensing for sports grounds, Safety Advisory Groups)?

		Response Percent	Response Total
1	Strongly Disagree	0.00%	0
2	Disagree	<input type="text" value="12.50%"/>	1

41. 38. To what extent do you agree with the following statement: Compliance with a Protect Duty would require greater effort (e.g. time, staff resource) than compliance for comparable legal and other obligations (e.g. fire safety, health and safety, Licensing Act 2003 guidance, licensing for sports grounds, Safety Advisory Groups)?

			Response Percent	Response Total
3	Neither Agree nor Disagree	<input type="text"/>	25.00%	2
4	Agree	<input type="text"/>	25.00%	2
5	Strongly Agree	<input type="text"/>	37.50%	3
			answered	8
			skipped	10

42. 39. How do you think these new requirements/mitigations will affect:

	Not at all	Increase	Decrease	Response Total
a. Number of customers/visitors visiting venues in scope of the duty?	62.5% (5)	12.5% (1)	25.0% (2)	8
b. The public's perception of the terrorist threat?	37.5% (3)	62.5% (5)	0.0% (0)	8
c. Vigilance of the workforce/use of good security behaviours by staff?	12.5% (1)	87.5% (7)	0.0% (0)	8
			answered	8
			skipped	10

43. 40. Annex 3 sets out the anticipated costs and benefits of intervention in the form of a Protect Duty. Please provide any comments you have on this Annex. (max 100 words)

			Response Percent	Response Total
1	Open-Ended Question		0.00%	0
No answers found.				
			answered	0
			skipped	18

44. 41. Are there any other issues regarding what parties within the scope of a Protect Duty should be required to do that you would like to offer views on? (max 200 words)

			Response Percent	Response Total
1	Open-Ended Question		100.00%	1
1	DIVERSIFIED COMMUNITY LEADERS			
			answered	1
			skipped	17

5. Section 3: How should compliance work?

45. 42.How can an inspection regime best be used to support improvements to security culture and practices?(max 100 words)			Response Percent	Response Total
1	Open-Ended Question		100.00%	4
1	INSPECTIONS WITHIN CURRENT LICENSING REGIME MODEL CAN BE ENHANCED TO INCLUDE PUBLIC SECURITY DUTY			
2	By having qualified person who have been properly trained to carry out this duty			
3	To ensure that things have been put in place, also to offer support, guidance and advice to organisations.			
4	incorporate requirements into Health and Safety Executive and H&S regulatory regime			
			answered	4
			skipped	14

46. 43. What are your views on the use of civil penalties (fines) for organisations who persistently fail to take reasonable steps to reduce the potential impact of attacks associated with ensuring compliance with a Protect Duty?(max 100 words)			Response Percent	Response Total
1	Open-Ended Question		100.00%	4
1	THEY MUST BE FAIR AND PROPORTIONATE			
2	It would depend on the process by which the fines/penalties are enforced and how genuine mistakes or errors would be viewed			
3	There needs to be some consequence otherwise people will not do it.			
4	Supportive of CPNs			
			answered	4
			skipped	14

47. 44.Do you have any other comments regarding how a compliance regime (inspection and enforcement) could operate?(max 100 words)			Response Percent	Response Total
1	Open-Ended Question		100.00%	2
1	Who does it? Who would have capacity - levels of requirement need to be appropriate to the business size and there should be a Engage, Encourage, Explain and Enforce approach. A mechanism to bring about compliance prior to enforcement that is justified and proportionate. Possible would need a bespoke team of partners such as local authority, police and CT. There would need to be an Audit for mandatory requirements. Also include specific teams such as licensing.			
2	See above - allocate function to HSE and inspection regime to LA regulatory teams (H&S officers) - and provide additional support, training & funding . HSE to enforce in premises that LAs own and operate			
			answered	2

47. 44.Do you have any other comments regarding how a compliance regime (inspection and enforcement) could operate?(max 100 words)			
		Response Percent	Response Total
		skipped	16

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

48. 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?			
		Response Percent	Response Total
1	Yes	60.00%	3
2	No	40.00%	2
		answered	5
		skipped	13

49. [If 45 = Yes]46. What, if anything, do you find most valuable in current advice and guidance? (max 100 words)			
		Response Percent	Response Total
1	Open-Ended Question	100.00%	2
1	TO RESEARCH AND USE THE INFORMATION ON PUBLIC SAFETY POLICY		
2	Business Sentinel - which is a brief that goes to partners in the CT world. Also the National threat Level, Gov Guidance on Health Rgs and licensing Act.		
		answered	2
		skipped	16

50. [If 45 = No]47. Why do you not currently access this advice and guidance?			
		Response Percent	Response Total
1	a. I did not know it existed	50.00%	1
2	b. I do not think I need to address the threat	50.00%	1
3	c. I do not have the time to access this	0.00%	0
4	d. It is too confusing to find what I want	0.00%	0
5	e. Other (max 100 words):	0.00%	0
		answered	2
		skipped	16

50. [If 45 = No]47. Why do you not currently access this advice and guidance?				
			Response Percent	Response Total
e. Other (max 100 words): (0)				
No answers found.				

51. [If 45 = No]47. Why do you not currently access this advice and guidance?				
			Response Percent	Response Total
1	a. A single, digital service where you could access relevant material, advice and training in one place	<input type="text"/>	33.33%	1
2	b. Easy to digest information regarding threat and attack methodologies		0.00%	0
3	c. A risk assessment template	<input type="text"/>	100.00%	3
4	d. Information on undertaking a risk assessment for terrorism threats	<input type="text"/>	33.33%	1
5	e. Advice relating to protective security mitigations	<input type="text"/>	33.33%	1
6	f. Advice relating to personnel and people security		0.00%	0
7	g. Advice relating to how an organisation can prepare for terrorism attack	<input type="text"/>	33.33%	1
8	h. Advice on what constitutes reasonably practicable and appropriate mitigations appropriate for my circumstances		0.00%	0
9	i. Development of product certifications or standards for aspects of the approach		0.00%	0
10	j. Staff training and awareness courses	<input type="text"/>	66.67%	2
11	k. E-learning products		0.00%	0
12	l. An App		0.00%	0
13	m. A sector meeting where I can talk about the Duty with experts and other similar organisations	<input type="text"/>	33.33%	1
14	n. A local meeting where I can talk about the Duty with experts and other similar organisations	<input type="text"/>	33.33%	1
15	Other (max 100 words):		0.00%	0
			answered	3
			skipped	15
Other (max 100 words): (0)				
No answers found.				

52. 49. Counter-Terrorism Policing are working with Government and the Private Sector to design a digital service to provide access to relevant counter-terrorism material, advice and training in one place for organisations operating in publicly accessible locations. Do you anticipate that you would access counter terrorism information through this service if it were available to you?

		Response Percent	Response Total
1	Yes	100.00%	5
2	No	0.00%	0
		answered	5
		skipped	13
Comments: (2)			
1	SEE ANSWER 47		
2	Content appropriate to licensing conditions should be included in this.		

53. [If 49= No]50. Why not?(max 100 words)

		Response Percent	Response Total
1	Open-Ended Question	0.00%	0
No answers found.			
		answered	0
		skipped	18

54. [If 49 = Yes]51. What would you most likely use this kind of service for (tick all that apply)?

		Response Percent	Response Total
1	a. To get general updates on how the terrorism risk is changing	100.00%	4
2	b. To support business planning activities	75.00%	3
3	c. To understand what risk management activities you need to do	75.00%	3
4	d. To access CT training	25.00%	1
5	e. To connect with other organisations to discuss counter terrorism	50.00%	2
6	f. To understand what to do after an incident	75.00%	3
7	g. Reporting of suspected terrorist activity/concerns	75.00%	3
		answered	4
		skipped	14

55. 52. Do you have any further comments or suggestions for how you might like to access counter-terrorism information and work with local partners on counter-terrorism issues in the future?(max 100 words)			Response Percent	Response Total
1	Open-Ended Question		100.00%	2
1	ONLINE DIGITAL PLATFORM WITH ALL LINKS AND CONNECTIONS TO RELEVANT ORGANISATIONS THAT PROVIDE SUPPORT			
2	Webinars/seminars - sharing of good practice, governing body and guest speakers to share experience.			
			answered	2
			skipped	16

56. 53. What role should local business partnerships (such as Business Improvement Districts, Local Enterprise partnerships, etc.) have in supporting organisations and venues to deliver improved security?(max 100 words)			Response Percent	Response Total
1	Open-Ended Question		100.00%	2
1	WITH SPECIFIC TERMS OF REFERENCE TO DELIVER THE INFORMATION ONLINE FOR PUBLIC AND BUSINESSES TO ACCESS. 1. IDENTIFY THE LEVELS OF THREAT 2. HOW IT AFFECTS PUBLIC SAFETY INCLUDING RESIDENTS 3. WHAT MITIGATING MEASURES TO PREPARE AND BE READY FOR THE THREAT 4. WHAT TO DO IF IT DOES HAPPEN 5. HOW SERVICES WILL BE MOBILISED IN THIS EVENT 6.BUILD COMMUNITY AWARENESS			
2	it is a Network which is very important and often under represented.			
			answered	2
			skipped	16

57. 54. Working with others, what could the Government best do to incentivise improved security practices?(max 100 words)			Response Percent	Response Total
1	Open-Ended Question		100.00%	3
1	BUILD AWARENESS WITHIN COMMUNITIES THROUGH VOLUNTARY SECTOR AND THE LOCAL POLICE			
2	By having realistic expectations and involving people with sufficient knowledge			
3	webinars/seminars some sort of portal of relevant information. Major updates with compulsory attendance. Program. Large businesses should be mandatory and smaller business signpost.			
			answered	3
			skipped	15

58. 55. To support the provision of high-quality advice and guidance from private sector security professionals providing counter terrorism security advice, Government should consider (tick all that apply)			Response Percent	Response Total

58. 55. To support the provision of high-quality advice and guidance from private sector security professionals providing counter terrorism security advice, Government should consider (tick all that apply)

			Response Percent	Response Total
1	a. Government supported standards for Counter Terrorism (CT) risk assessments and advice	<input type="checkbox"/>	100.00%	4
2	b. Qualifications / Accredited training for individual professionals	<input type="checkbox"/>	75.00%	3
3	c. Government supported 'approved contractors scheme'	<input type="checkbox"/>	75.00%	3
4	d. Regulation of CT consultants	<input type="checkbox"/>	25.00%	1
5	e. None		0.00%	0
6	g. I don't know		0.00%	0
7	f. Other (max 100 words):	<input type="checkbox"/>	25.00%	1
			answered	4
			skipped	14
f. Other (max 100 words): (1)				
1	AWARENESS BUILDING POLICE AND COMMUNITY LEADERS AND BUSINESS FORUMS			

59. 56. What advice and support do you think would be required for organisations and venues within the scope of a Protect Duty?(max 100 words)

			Response Percent	Response Total
1	Open-Ended Question		100.00%	3
1	AWARENESS AND TRAINING SUPPORT COMING OUT OF THE LOCAL PARTNERSHIP MODEL			
2	Regular input and mysteryshopper style visits			
3	Gov.uk - specific group to ensure consistency Consultation Liaison officer for consistency until the process is embedded.			
			answered	3
			skipped	15

60. 57. Given the complexity of public spaces, and the potential need for partnership working to achieve effective ways of working leading to improvements in protective security and preparedness, what additional bespoke support and expertise could be provided?(max 100 words)

			Response Percent	Response Total
1	Open-Ended Question		100.00%	3

60. 57. Given the complexity of public spaces, and the potential need for partnership working to achieve effective ways of working leading to improvements in protective security and preparedness, what additional bespoke support and expertise could be provided?(max 100 words)

		Response Percent	Response Total
1	SIGNAGE, LEAFLETS DISTRIBUTION AT ENTRY POINTS, SITE LOCATIONS TO REPORT ETC		
2	Training and regular updates		
3	SIA could feed in, but there needs to be an alignment to existing agencies, ie H&S, Local Authority, Licensing, SIA. There needs to be structure and hierarchy through various strands. Extension of existing groups within the LRF Contest Strategical and tactical meeting within LRF to ensure consistency		
		answered	3
		skipped	15

61. 58. Do you have any other proposals on what Government could do to support partners in the delivery of a Protect Duty?(max 200 words)

		Response Percent	Response Total
1	Open-Ended Question	100.00%	2
1	No		
2	Access to funding - Government needs to share successes and what is happening elsewhere in the country.		
		answered	2
		skipped	16