



**RESPONSE OF THE COUNCIL FOR PUBLIC AFFAIRS OF THE
PRESBYTERIAN CHURCH IN IRELAND TO THE CALL FOR EVIDENCE BY THE
NORTHERN IRELAND ASSEMBLY COMMITTEE FOR COMMUNITIES ON THE
LICENSING AND REGISTRATION OF CLUBS (AMENDMENT) BILL**

DECEMBER 2020

Background

1. The Presbyterian Church in Ireland (PCI) has over 217,000 members belonging to 535 congregations across 19 Presbyteries throughout Ireland, north and south. The Council for Public Affairs is authorised by the General Assembly of the Presbyterian Church in Ireland to speak on behalf of PCI on matters of public policy. The Church's Council for Social Witness seeks to deliver an effective social witness service on behalf of PCI and to the wider community through the provision of residential care, nursing care, respite care and supporting housing for vulnerable people including the elderly, those with disabilities and those transitioning from the criminal justice system. The Council for Social Witness also oversees safeguarding for children and vulnerable adults for the denomination.
2. PCI has an interest in alcohol policy as a provider of services and pastoral care to those with addictions and their families. PCI operates a residential substance misuse treatment centre, situated near the centre of Belfast, which offers a range of services, advice and information, treatment programmes, and ongoing support services funded by the Health and Social Care Trusts. We also provide supported accommodation for people in early recovery who were homeless or living circumstances detrimental to their recovery. Additionally, congregations offer a range of pastoral support to individuals and families directly affected by alcohol misuse.

General comments on the Bill

3. When this legislation was introduced back in 2016 PCI did not oppose the clauses as introduced that provided for additional opening hours, recognising that the extension to opening hours on the Thursday before Good Friday represented a modest change, and that extensions to 'drinking-up time' were for a trial period which would then be reviewed.
4. Clauses 1 and 23 of this new legislation remove most of the restrictions on licensed premises and registered clubs so that Easter weekend permitted hours now mirror what is available for any other weekend during the rest of the year. The rationale for this is both based on economic reasons - in 2016 Hospitality Ulster estimated that approximately £16 million in revenue was lost due to these restrictions; and, that elsewhere on these islands similar restrictions no longer exist.

5. The changes proposed in 2020 are significantly different to the more modest changes proposed in 2016, but PCI notes that the response of the public consultation was overwhelming in support of the extended opening hours, if slightly less so for opening on Easter Sunday. PCI would like to place on record that Easter remains a significant and important time for many, of all denominations and none, across Northern Ireland, and we do not think it unreasonable for society to mark that in a relatively small way by treating opening hours differently over that time. While of course those who wish to observe Easter are not obliged now to participate in extended opening hours, we would comment with regret that many of the rhythms of life, often based on religious custom and which allow space for rest and reflection for the good of all, are increasingly squeezed out of society. We would also ask that consideration be given to the introduction of protections for workers who would choose not to work on Good Friday and Easter Sunday out of their desire to observe this religious occasion, ensuring they have the ability to attend public worship and other activities.
6. PCI also notes that under clause 2 of the Bill certain licensed premises are to be allowed one additional hour of late opening on a maximum of 104 occasions in any year (except for Christmas Day). Again this is a significant change to what was proposed in 2016 where such extensions would be permitted up to a maximum of 12 times in any year. PCI notes the significant support for this proposal through the public consultation but would highlight the difference in opinion which emerged between those representing the hospitality sector and those organisations responding from a public health perspective.
7. Recognising that more alcohol is being consumed in the unregulated environment of the home, alongside the introduction of home delivery, it does seem counter-intuitive to be introducing new measures to extend drinking time in licensed premises which may have a detrimental impact on resources allocated to public health and safety. PCI is concerned that the Explanatory and Financial Memorandum accompanying the Bill does not include estimated figures from the PSNI on the additional administrative costs likely to be incurred as result of the increase in applications for later opening, and that the Minister was not in a position to provide these figures during the Second Reading of the Bill.
8. PCI would draw the Committee's attention to paragraph 27 of the EFM which states that:

"The PSNI... advised that the proposals in the Bill would have implications for policing the night time economy and would lead to increased resourcing costs for the PSNI as well as other support services that assist police. The PSNI advised that there would be an impact on its shift system and therefore expected overall a major impact on resourcing both from a financial and staffing point of view".
9. In light of this PCI would ask the Committee to revisit the provisions to allow late opening up to a maximum of 104 occasions in any year (in reality, every weekend) and recommend reducing this amount to facilitate a joined-up approach across government and reduce potential stress on PSNI and public health resources. Also consideration should be given to the long working hours of staff and their personal safety in traveling home. PCI would also express concern about the potential detrimental impact of regular late opening of licensed premises where these are located in close proximity to residential areas, places of worship or church halls and community centres providing services and activities for children and young people.

10. With regard to the extension of 'drinking-up time' from 30 minutes to one hour, as provided for in Clauses 5 & 24, PCI notes the concern that this could lead to 'stockpiling' which in turn leads to binge-drinking – the very effect these changes are hoping to prevent. PCI notes that the 2016 legislation also sought to introduce this measure, although for a trial period with a review after 12 months. PCI would recommend that the Committee considers revisiting this proposal for a review after 12 months so that the impact of these changes can be monitored and amended as appropriate. Building in a review period to the provisions for extending opening hours would also be beneficial. Such reviews might consider the public health and safety impact of these changes, including the staffing and resource implications for the PSNI.
11. PCI welcomes the various measures set out that are designed to protect children and young people, whilst addressing the excessive consumption of alcohol. Specifically, PCI welcomes the role of the courts in determining whether part of a licensed premises is suitable to hold underage functions, and the need to be satisfied that appropriate steps are being taken to secure the safety of under 18s, and that under 18s do not have access to any other part of the premises used for the sale of alcohol. Specific attention should be paid to how young people will enter and exit the venue. Measures should also be put in place to ensure that all aspects of safeguarding for under 18s are taken into account, including appropriate information sharing between agencies and licensed premises.
12. PCI is also supportive of the move to make it an offence for gaming machines to be available where the function is being held. PCI would encourage continued efforts within formal, and informal, learning environments to educate children and young people on the risks associated with excessive alcohol consumption and helping them to make informed choices in this and other areas of their lives.
13. PCI hopes that the proposed restrictions on the advertising of drinks promotions in supermarkets will lead to a reduction in impulse purchases. However attention should also be paid to pricing so that the purchase of cheaper alcoholic drinks does not become more attractive than purchasing non-alcoholic alternatives. Specifically much research over the years has drawn attention to the high price of non-alcoholic drinks in licenced premises, with some alcoholic drinks being less expensive.

Further comments

14. Alcoholic drinks are consumed by a large proportion of the population and many of those who consume alcohol do so responsibly in moderation. It is important to recognise, however, that alcohol, when misused, has serious adverse effects for individuals, families and wider society. These effects are well documented. In previous public discussions about alcohol licensing, the Churches found common voice with Health and Social Care professionals, many of whom see the strain placed on Accident and Emergency Units and other public services, and with police officers who see at first hand the results of drink-driving, domestic violence and other forms of alcohol-related abuse. It is clear to us that public health, community safety and the wellbeing of individuals and families should be the primary concerns in all public policy-making about alcohol.
15. The trend has greatly changed in recent years, with the majority of alcohol now consumed at home. It is therefore vital that, as our society considers how to prevent and address alcohol abuse, responsible attitudes to alcohol are engendered, and that the total availability of alcohol from all types of licensed premises is appropriately controlled.

16. Expert reports consistently emphasise the need to address a variety of areas in order to effectively tackle alcohol abuse. These include pricing, labelling, availability, advertising, drink-driving measures, and early intervention and treatment. We understand that a new substance misuse strategy is due to be published for formal consultation in the next while. We believe this is an issue which demands continued formal and focused cooperation between service providers, the Executive Departments and the UK Government. Whilst reports suggest that progress has been made in recent years, there is still much work to be done, and we would welcome a reenergised public discussion on addressing the misuse of alcohol.

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**Rev Daniel Kane (Convener of the
Council for Public Affairs)**

A handwritten signature in black ink, appearing to read 'T. D. Gribben', with a horizontal line underneath.

**Rev Trevor D Gribben
(Clerk of the General Assembly)**