

**NORTHERN IRELAND ASSEMBLY
COMMITTEE FOR COMMUNITIES**

**CALL FOR EVIDENCE AND VIEWS ON THE LICENSING AND
REGISTRATION OF CLUBS (AMENDMENT) BILL**

Please note that in most cases your written submissions will be published on our website and may be quoted in the Committee's report or in Committee meetings (which are public and broadcast).

If you would like to request that what you tell us is published without your name, please contact the Clerk at the following email address:
Committee.Communities@niassembly.gov.uk or by calling 028 9052 1939.

We will consider all requests for information to be treated anonymously.

Please provide comment on any or all parts of the template. If you do not agree with a particular clause, please consider suggesting how it should be amended to meet its objective.

Please indicate if you are providing a submission:

- as an individual
- on behalf of an organisation or business

SUBMISSION FROM: [Click or tap here to enter text.](#)

If you are responding on behalf of an organisation or business, please tell us briefly how it relates to the subject matter of the Bill:

Please note that the Royal College of Psychiatrists is the statutory body responsible for the supervision of the training and accreditation of Psychiatrists in the UK and for providing guidelines and advice regarding the treatment, care and prevention of mental and behavioural disorders. Among its principal aims are to improve the outcomes for those with mental illness and to improve the mental health of individuals, families and communities.

The College has approximately 440 members in Northern Ireland, including Doctors in training. These Doctors provide the backbone of the local Psychiatric service, offering inpatient, day patient and outpatient treatment, as well as specialist care and consultation across a large range of settings.

This is submitted on behalf of the Royal College of Psychiatrists in Northern Ireland Devolved Council after referral to our Faculty of Addictions Psychiatry.

The Royal College of Psychiatrists in Northern Ireland recognises that there is a desire to balance the demand for individual freedom of choice and the opportunity for local businesses to continue to provide a high level of service to their customers - against the risk of adding to or hindering current efforts to reduce the major social and health harms associated with alcohol use across our society.

Many of the proposed changes in the consultation are aimed at making very modest changes to either access to alcohol or opening hours to consume alcohol. There is very little evidence to support or oppose any of these proposals individually, but their collective effect would be to increase the availability of alcohol and provide longer drinking hours. The impact of increased availability of alcohol on health is well established. Strong evidence shows that increasing access to alcohol through more outlets and longer trading hours affects a range of alcohol-related harms. Overall, the evidence suggests that restricting the availability of alcohol can contribute to a reduction in alcohol-related problems. Any change to licensing laws should consider this impact, the impact on crime, disorder and threats to public safety.

1. The Policy Objectives of the Bill

The policy objectives of the Bill are *“to introduce a balanced package of measures to update the law in respect of the retail sale of alcoholic drinks and to make it more responsive to the current social and economic environment”*.

1. What are your views on the overall policy objectives? Do you think that the Bill will meet those objectives? If not, why not?

See above.

2. Easter Opening Hours and Additional Permitted Opening Hours

What are your views on the provisions in the Bill on:

(2a) The removal of restrictions at Easter [Cl**auses **1** & **23**]?**

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(2b) Additional permitted hours for certain licensed premises [Cl**ause **2**]?**

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(2c) PSNI authorisation for additional permitted hours for smaller pubs [Cl**ause **4**]?**

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3. “Drinking-up Time” and the Alignment of Alcohol and Entertainment Licences

The Bill contains provisions to extend the current “drinking up” time in licensed premises and private members’ clubs from 30 minutes to 1 hour [**Clauses 5 & 24**].

The Department for Communities states that the aim is to discourage customers from drinking too quickly and to allow a more gradual departure from premises at closing time, especially from large venues.

(3a) What are your views on the extension of “drinking-up” time?

While the intention to discourage customers from drinking up quickly and to encourage a more gradual departure is good, it is equally possible that people will purchase more alcohol to drink over the longer drinking up period and this will in effect lead to an increase in alcohol consumption.

(3b) What impact do you think it would have on alcohol consumption towards closing time and during ‘drinking up’ time?

It is likely that consumption will increase.

(3c) What impact do you think it would have on issues such as anti-social behaviour and crowd dispersal?

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(3d) Do you have any comments on the proposals to align closing time for liquor and entertainment licences [Clause 3**]**

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4. Supporting Tourism, Special Events and Small Producers

(4a) Do you think that the provisions contained within the Bill will have a positive impact on hospitality and/or tourism and in Northern Ireland? If so, how?

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(4b) What are your views on the proposals relating to permitted hours for special events [Clauses 6 & 25**]**

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(4c) What are your views on the provisions of the Bill that are aimed at supporting small local producers of beer, cider and spirits [Clause 8]? What impact do you envisage this could have on tourism? Do you feel that the regulatory framework, as outlined in the Bill, is sufficiently robust?

While we appreciate the need to support local producers and tourism, this should be balanced against the known risk of increased harm associated with increased number of alcohol outlets. Increased health and social harm are associated with increased density of alcohol outlets.

5. Children and Young People (under the age of 18)

The Bill contains a number of provisions directly relevant to children and young people. The Committee is keen to hear your views on the provisions of the Bill relating to children and young people and the proposed additional safeguarding measures, where relevant.

What are your views on:

(5a) The removal of the requirement of a licensed premises or registered club to hold a children's certificate [Clauses 10 & 26]?

It seems reasonable that the current law requiring a children's certificate be revoked on the understanding that exactly the same conditions would apply and be enforced.

(5b) Permitting certain premises to hold underage functions; the conditions that must be met; the permitted opening hours; and, proposed enforcement action [Clauses 11 & 27]?

The proposal to permit underage functions in licensed premises beyond 9.00pm, provided the bar was closed in conjunction with strict conditions to be met - in order for such a function to take place, appears reasonable.

(5c) Permitting the attendance of young people to remain on licensed premises to attend a private function (e.g. a wedding reception) and the proposed conditions that must be met [Clauses 12 & 28]?

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(5d) The strengthening of the current law around the delivery of alcohol [Clauses 9] and the delivery of alcohol to young people [Clause 13]?

It seems prudent to adopt additional safeguards including prohibiting under 18s from receiving any deliveries of alcoholic drinks and requiring proof of age to be shown and recorded upon delivery.

(5e) The prohibition on self-service and sale of alcohol by vending machines [Clauses 15 & 30]?

The proposal to prevent the use of self-service, ensuring the sale and supply of alcoholic drinks is only under the direct supervision of a licence holder or member of staff, is strongly supported.

(5f) Permitting children and young people to be present in a sporting club to 11:00pm during the summer months (1 June to 31 August) [Clause 29]?

The Royal College of Psychiatrists in Northern Ireland do not have any evidence to inform an opinion on whether the health benefits of getting involved in sporting activities justifies extended access to the bar area in sports clubs compared to other licensed premises. However, it does note that some major sports in Northern Ireland are sponsored by the alcohol industry and may have a culture of drinking alcohol above low risk levels.

(5g) Permitting children and young people to attend an awards ceremony in a sporting club one night per calendar year (until 11pm) [Clause 29]?

(5h) Overall, do you feel the measures are adequate to protect children and young people from alcohol related harm? If not, why not?

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6. Alcohol Consumption and Alcohol-Related Harm

The Bill proposes to address certain aspects of alcohol consumption and related harm, for example:

- Introducing a number of restrictions on off-sales drinks promotions in supermarkets [Clause 16];
- Regulating the delivery of alcoholic drinks to young people [Clause 13];
- Prohibiting the awarding or redemption of loyalty or bonus points for the purchase of alcohol in licensed premises [Clause 17]; and
- Prohibiting the sale of alcohol by way of self-service or vending machine (with certain exceptions) [Clauses 15 & 30].

(6a) What impact do you think these measures will have on reducing alcohol consumption and preventing alcohol-related harm?

The Royal College of Psychiatrists in Northern Ireland supports the proposal to restrict the advertising of drinks promotions in supermarkets to the off-sales area. It is not clear if the proposal to restrict external advertisements for

supermarkets or other off-sales premises to within 200 metres of the premises could be either delivered or enforced. Proposed restrictions on off-sales drinks promotions do not go far enough. We suggest restrictions on multi-buy offers should be considered.

(6b) Do you have any other comments in relation to any other aspect of the Bill in relation to alcohol consumption and alcohol-related harm?

7. Regulation, Enforcement, Offences and Penalties

(7a) The Bill proposes to allow statutory approval for voluntary industry-led codes of practice in relation to the sale and supply of alcohol in licensed premises and registered clubs [Clauses [19](#) & [32](#)]. Do you feel these are an effective means of helping to regulate the industry? If not, what alternatives would you suggest?

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(7b) The Bill contains provisions to permit a court, when determining an application for an occasional licence, to impose terms and conditions on the licence with consequences for non-compliance [Clause [18](#)]. What are your views on this?

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(7c) What are your views on the measures in the Bill that would require a body corporate (licensee) to notify the courts and police of any change of directorship (within 28 days) [Clause [20](#)]?

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(7d) Throughout the Bill there are a number of new offences and/or penalties under The Licensing (NI) Order 1996, The Registration of Clubs (NI) Order 1996 and The Betting, Gaming, Lotteries and Amusements (NI) Order 1985. The Committee would welcome any comments you have in relation to these.

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8. Resource Implications for Certain Organisations/Bodies

8. What do you think the resource implications will be for:

(a) The PSNI:

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(b) Health and social services:

Increased availability of alcohol leads to increased alcohol related health harms - specifically in the form of alcohol use disorders, alcohol related liver disease, alcohol related brain damage and other alcohol related health conditions. This leads to increased morbidity and mortality, an increased demand on NHS and social services, increased hospitalisations and increased deaths.

(c) Other organisations (please specify):

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9. Registered Clubs

9. Do you have any additional comments on the provisions in the Bill which specifically relate to registered clubs [**Clauses 22 to 32**]?

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10. Additional Information

(10a) Are there any other measures *not included* in the Bill that you think should be included and why?

The Royal College of Psychiatrists in Northern Ireland recommends the following measures are considered:

- A voluntary ban on the sale of high strength beers through off-licences;
- A ban on multi-buy purchases such as "two for one" or other drinks' promotions which provide alcohol at substantially reduced prices;
- The introduction of minimum unit pricing;
- Ban all advertising for alcohol products which may encourage young people to drink to excess;

- Review the density of licensed premises around known hot spots for alcohol related public order offences;
- Prevent sales of alcohol to people who are already intoxicated on alcohol by providing better staff guidance training;
- Set up multidisciplinary groups involving licensing authorities, health bodies, PSNI, businesses and other relevant groups to monitor the night-time economy.

(10b) Do you have any other comments you would like to make?

Click or tap here to enter text.

Thank you

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