



**Northern Ireland
Assembly**

COMMITTEE FOR COMMUNITIES

Please use this form to submit written submissions in relation to the Licensing and Registration of Clubs (Amendment) Bill. Return to committee.communities@niassembly.gov.uk by Wednesday 19 October 2016.

Name: Janice Gault

Organisation: (if applicable) Northern Ireland Hotels Federation

Date: September 2016

(where possible, please structure your response to the specific clauses of the Bill and, if appropriate, suggest alternative or additional wording to clauses, which may assist the Committee's consideration of the need for any amendments to the Bill)

Part 1

Clause 1 Additional Easter hours (Article 30, 44,45,47A)

There is a proposed minor change to Easter opening hours and this does not take into account the tourism element of the hospitality Industry. The amendment does not take into consideration events that may be held in the region over the Easter period. Nor does it address the current Easter regime may effectively discourage organisations from staging such events.

Ideally we would like more flexibility around this time and that specific events could be facilitated by special licence.

Clause 2 Additional Hours (Article 30A)

This does not address major events such as MTV or shows like the BBC Good Food

Show. The current framework means that events of this nature have been unable to sell alcohol on a commercial basis. The amended Order does not address the changing nature of events and the timings that they may require to make Northern Ireland a more attractive destination. Under the draft programme for Government one key indicator is to make Northern Ireland a more attractive destination. Whilst the NIHF does not condone in any manner the irresponsible consumption or sale of alcohol, the proposed framework does little to provide a flexible approach to events, festivals and conferences of an international nature. These events bring great economic benefit to the local economy and licensing should not present a barrier to their staging.

Clauses 5&6

The Federation agrees with this extension and also the alignment of liquor, entertainment and refreshment provision.

Clause 7

Removal of children's certificates: the Federation agrees with this measure but has concerns in relation to the licensing treatment of children on hotel premises. The proposal is to put safeguards in place to remove young people from a bar or area primarily used for the consumption of intoxicating liquor. This does not take into account family events or weddings. The material question is the use of the function room or area in which the event is taking place – the NIHF would argue that in the case of a wedding it is not being used mainly or exclusively for the consumption of alcohol on that occasion. The NIHF would like to request amendments to the Bill to clarify and reflect this important element of hotel use. Currently it is possible that hotels might be seen to be breaking the law if persons under 18 are at a wedding or family celebration. This is an important income stream for the sector and we would not like it be jeopardised by legal ambiguity which perhaps unintentionally serves to restrict.

Clause 8

The staging of formals and under 18 events is a key amendment for the Hotels. The NIHF would like to see a simple and clear process for hotel premises to apply to hold events for under 18-year-old in designated parts of their building. The Federation would like this to be a simple process executed in line with licence applications and for all premises including clubs to be subjected to the same code or practice and set of rules. The NIHF estimates the formal business to be worth £1.4m over the course of a year. In the 2015-16 season, some of this business has been displaced across the border. Hotels rely on events of this nature to see them through the quieter off peak season and they are important in terms of employment and survival for many premises. The NIHF would also add that many young people's first experience of a hotel is a lasting one. This emotional bond can lead to a loyalty to a local hotel with weddings and family events being booked as a result.

The NIHF also feels that hotels can offer a well policed, safe and responsible environment for young people to enjoy themselves in an appropriate manner.

Clause 10

The NIHF agrees that licence conditions should be shown in restaurants and guest houses

Clause 11

The NIHF feels this clause may not have been fully thought out and may not take into consider new or differing products coming to market

Clause 13

A code of practice is a responsible and sensible approach. However, the Federation would ask if it is to be mandatory and what costs are to be incurred in meeting it? The NIHF has concerns that it will be subjective and open to abuse.

PART 2 – Registration of Clubs Clauses 15-22

The NIHF feels that a number of elements within the proposed changes for clubs will

allow this sector to compete on an unfair playing field with hotels. These premises in the main do not pay rates and are not subject to the same licensing requirements and staffing levels as hotels. The Federation queries the need for the amount of licences to be made available to clubs and also feels the extension of hours for which a young person is allowed on a clubs premises to be particularly difficult to police by volunteer members who may play on the same teams or manage the young people.

The nature of clubs is that they are membership based and are not supposed to stage commercial event to attract the public. The NIHF therefore queries the need for clubs to advertise in the public arena when they have the capacity in this day and age to make direct contact with their members.

For official use only

Date received: _____

Ref Number: _____