

**Wales Tourism Alliance Position Statement**

**Statutory Registration**

**Introduction**

Firstly, the WTA does not support a licensing scheme, as a ‘licensing scheme’ suggests that un-elected public sector officers will gain statutory powers to preside over whether a business is able to operate.

However, the WTA are not against a light touch ‘registration scheme’. That is a registration scheme that allows businesses to voluntarily ‘self-assess’ and enter their own business details. This we believe will ensure a certain level of quality, develop safe and legal practise and remove those who are not operating within the law and who maybe trading uncompetitively.

The WTA broadly agrees that the following basic principles should be:

* **All paid accommodation has to register**
* **The Statutory Registration Scheme must be centrally managed**
* **The Registration cycle should be annual on a rolling basis**
* **The property’s valid registration numbers must be present on all advertising platforms**
* **The annual registration fee should be around £100 per property**

This would achieve the long-standing policy objective of a ‘level playing field’ for all businesses, and at the same time finally provide the key data on the entire tourism accommodation sector.

**Who should have to apply for Statutory Registration?**

All property that is let even for a single night must register. All property, regardless of size, however many days let and where ever they advertise will shortly have to have a written Fire Risk Assessment by law. This effectively becomes the base level for Statutory Registration.

**Policy: All paid accommodation has to Register.**

**It should be a centrally run scheme?**

It needs to be centrally run in order to maintain clarity and consistency across Wales. It will also be able to provide nationwide data that has long been required in order to be able to develop strategic insight.

**Policy: The Statutory Registration Scheme must be centrally run**

**Frequency of Registration**

The frequency should be annual because the primary health and safety requirements of a Fire Risk Assessments and Gas Certificates are annual. Indeed, the Covid “Good to Go” scheme and website is a perfect model for how this could be administered centrally Compliance checks, if felt necessary, could be carried out by local authorities in collaboration with Welsh Government.

**Policy**: **Annual.**

**Should properties require a valid Registration Number to advertise their property, should this number be displayed?**

Without having to have a Registration Number and a requirement to display it on all advertising nothing actually changes, bad actors can continue to advertise, those that think it does not apply to them continue to advertise and there will still be no ‘level playing field’.

OTAs, marketing bodies, booking platforms and the general public should not have access to all information on ownership of any property via a statutory scheme. OTAs should though have access to the business name and registration number, if OTAs advertise properties that are not registered then they should be subject to penalties.

Other than the registration number and name of the property no other information should be released for reasons of data protection. Customers will also need to be able to confirm that the property is registered and documentation is up to date in a similar way to checking with the current ‘scores on the doors’ system.

**Policy: The property’s valid registration numbers must be present on all advertising platforms**

**The annual registration fee should be around £100 per property**

If there is to be a registration scheme then we believe all property that is rented out for a commercial fee, whether it be for one night in the year or for the full year should be registered and within the scope of any statutory scheme.

**Policy. The Registration Fee should be around £100 per property.**

What information should be collected? (Please tick all that apply).

|  |  |  |  |
| --- | --- | --- | --- |
|  | To be collected at registration | To be collected annually | Should not be collected |
| 1. Address of the premises/dwelling(s)
 | X |  |  |
| 1. Name of the premises/dwelling owner
 | X |  |  |
| 1. Address and contact details of premises/dwelling owner
 | X |  |  |
| 1. Address and contact details of operator/manager, if different
 | X |  |  |
| 1. Whether the premises/dwelling to be let is a dwelling or part of a dwelling, such as a room or outbuilding
 | X |  |  |
| 1. Self-certification of adherence to relevant regulations
 |  |  |  |
| 1. Proof (e.g., a photograph or electronic upload) of adherence to regulations
 |  | X |  |
| 1. Detail about the accommodation unit(s) (e.g., number of units, number of bedspaces, accessibility)
 | X |  |  |
| 1. If relevant, confirmation that in any rental, lease or other agreement that the responsible person has authorisation to use the premises for short-term letting purposes
 | X |  |  |
| 1. Whether planning permission has been granted or is not
 | X |  |  |

We suggest that the person registering is required to confirm each year whether the information that was provided at initial registration, or at in the previous year’s registration, is still accurate. The information should be presented to the person registering as a prompt to review the information with a positive confirmation required. This is similar to the process for reconfirming eligibility for tax-free childcare which is required every quarter, for example.

**Concluding statement:** The WTA believes that whatever scheme is devised it should be light touch. It should be simple and easy to use and include all static structures but exclude temporary structures and vehicles. We do not believe that there should be a fit & proper person test.

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