



Professional Association of Self-Caterers UK

PASC UK NEWSLETTER

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COMMENTARY

Firstly, thanks for all the emails wishing us a good holiday and for holding back on the number of calls and email whilst we were away. Huge thanks for that. Much appreciated. We had a great break 😊

Short newsletter today, as we need to get onto chasing up the Welsh Government and as you'll see below... the Isle of Wight Council.....

The Mini Budget didn't have anything for us a sector and we will now have to await the further measures that the Chancellor has promised in November. We will continue to lobby for further support, particularly a VAT reduction and Business Rates discount or holiday.

We continue to chase for greater detail on the energy support package provided by the Government, there are some updates on this in the section below, but still nothing clear for those on LPG or Oil.

The English Call for Evidence is complete, and with over 4,000 responses, has shown that there is appetite for change in England, we are reasonably confident that the majority will go for a light touch Registration scheme, Option 4 in the Call, and as soon as we have more information on the shape of the responses, we will let you know.

Whilst DCMS (the Govt Dept responsible for the Call and pulling together the forthcoming Consultation) is analysing the responses, PASC UK will be gathering evidence from the Members and Readers of this newsletter, as well as colleagues in the sector, particularly the 40 or so organisations that formed the 'Safe and Legal' campaign, to produce a paper that will cover the future of self-catering in England.

We may need to be radical in what we propose. The sector is reputation constantly blighted by the 'second homes' issue, and one of the key asks of such a document would be to propose and get agreement with Government on what a self-catering business is, and what a second home is. We will be pulling together Surveys on all of this over the coming days and weeks and will be asking for as many of you as possible to take part and contribute.

We have also had notice this week of an English Council taking steps to radically change the landscape for self-catering in their area. The Isle of Wight Council has announced that any holiday let, open for more than 140 days a year, must apply for Planning Permission to operate as a holiday let. We don't have all the details yet and will come back with more on this next week. If this passes the Planning Inspectorate, it's highly likely that this could be followed by other Councils in areas where 'second homes' is a burning issue, almost a Licensing Scheme by stealth.

You should all have received your 2022 Membership Packs by now, if you haven't let us know, if any details were wrong, please also let us know and we can amend and resend.

In Wales, our two key objectives remain firstly, the reversal of the decisions to effectively fine businesses for not achieving 70 days let during Covid Lockdowns and secondly, to get agreement on the still outstanding list of exemptions from paying the Council Tax Premium if businesses cannot achieve 182 days. As Welsh owners will see below, there is a Visit Wales virtual conference on their marketing plans, we urge as many of you as possible to join this session and ask Visit Wales what they are specifically doing to help owners achieve 182 days let prior to end of March next year.

We have had to cancel the date of the Access Webinar for a second time. Huge apologies for the inconvenience. I have been invited to the House of Commons on that day to meet all the South West England MP's, just too good an opportunity to miss. As soon as I have got new dates from all the speakers, we will update everyone who has registered.

Finally for this week we have seen that Awaze is possibly going to be put up for sale, many readers of this newsletter do use Cottages.com or Hoseasons as a booking platform:
<https://www.travolution.com/news/cottages.com-owner-awaze-tipped-for-2bn-sale-or-public-listing/>

Having had a previous career in buying and selling companies £2bn looks a bit like clickbait to me, but who knows these days? We will write a further commentary on how private equity style businesses may find times more challenging over the coming years in a future newsletter.

Your comments and feedback are always welcome, please send to chair@pascuk.co.uk

Wishing each and every one of you all the very best at this challenging time.

Alistair

GOVERNMENT SUPPORT FOR ENERGY BILLS UPDATE 4 Oct

There is still limited information available about what precise form the support will be, particularly for LPG and oil. We are told that Government and Energy Company meetings will continue this week and next, prior to full detail being revealed.

All the information we have currently is below, with any changes and further notes provided in red.

To address the soaring price of energy the Government has introduced a new Government Energy Bill Relief Scheme (GEBRS) to reduce the amount that businesses will need to pay. It will take the form of a discount of wholesale gas and electricity prices for all non-domestic customers.

It will apply to all fixed contracts agreed after 1st April 2022, as well as deemed, variable and flexible tariffs. The discount will be applied to bills automatically.

To deliver the support Government has set a Supported Wholesale Price which is expected to be £211 per MWh for electricity (21.1p/kWh) and £75 per MWh for gas (7.5p/kWh) – estimated to be half of wholesale prices this winter. It includes the removal of green levies.

It will apply for an ‘initial’ six months, from 1st October 2022 to 31st March 2023. The discount will be applied automatically and will be seen from October bills onwards – most likely received in November.

The scheme applies across England, Scotland and Wales. An equivalent mechanism will apply in Northern Ireland and further details will be published shortly.

Further details will also be published on other energy sources – such as gas oil and alternative fuels. **Nothing provided at time of writing.**

A review of the scheme will be published in three months ahead of any further decisions.

How the discount will work:

For those on **fixed price contracts** taken out after 1st April 2022 that is priced higher than the Supported Wholesale Price a discount will be applied to bring prices down to the Supported Price. The level of the discount will be the difference between the Supported Price and the wholesale price of energy on the day the contract was agreed. Government will publish a list of the wholesale prices they will be using to calculate this for every day from 1st April 2022.

For those on **non-fixed contracts** it is a little more complex. A per unit discount will be applied up to a maximum of the difference between the Supported Price and the average expected wholesale price for energy across the period. The maximum discount is expected to be 40.5p/kWh for electricity and 11.5p/kWh for gas but will be confirmed on 30th September.

Therefore, there will be fluctuations in the price paid by those on non-fixed contracts and prices could increase month-to-month.

Government is working with suppliers to support all customers in being able to access a fixed price contract for the duration of the scheme.

Those on **flexible purchase contracts**, will have the level of their reduction offered calculated by suppliers according to the specifics of that company's contract and will also be subject to the Maximum Discount.

The basis of your price reduction will depend on the difference between your monthly weighted average baseload price (determined by your individual hedging approach) and the government supported price. In this case the maximum support available per unit of energy will also be limited by the maximum discount.

Government Guidance here: <https://www.gov.uk/guidance/energy-bill-relief-scheme-help-for-businesses-and-other-non-domestic-customers>

Questions and answers:

Will the price paid be the Supported Wholesale Price?

No. The final price will also include other costs such as network charges and operating costs – which could be a significant element of the bill, while reflecting competition between suppliers. Those on variable tariffs may see additional fluctuations.

Businesses that have paid more than the Supported Price and the Maximum discount combined will pay more than the Supported Price – either through a variable rate or a fixed contract that is above the estimate of average prices on the day it was taken out.

Those on a fixed contract will see a discount on the price they have fixed – this will be the difference between the cap price and the Government-published wholesale price on the day on which the contract was agreed.

What is the price of wholesale price on the day of my fixed contract?

This will be published shortly by Government and will be a critical component of the final bill you pay.

What do I need to do to access this support?

Nothing. The discount will be automatically applied to bills. It is advisable to scrutinise your bills to ensure that the discount is being applied and to consider what form of tariff is preferable for your business.

I signed a fixed contract before 1st April 2022 do I benefit from this support?

No. This only applies to contracts signed after 1st April 2022 as Government assumes prices were lower than the Support Price ahead of this period.

I fixed my rate below the support price, do I receive any support?

No. Support is only applicable to those on a deal paying more than the Supported Price.

What is the maximum discount?

This will be confirmed on 30th September but is estimated to be 40.5p/kWh for electricity and 11.5p/kWh for gas. **No further details at time of writing.**

Should I fix my prices?

This is a decision for individual businesses but the Government is working to make it easier for businesses to fix for the duration of the scheme. This will provide greater certainty as variable tariffs could still lead to increases in your bills – if wholesale prices are higher than the maximum discount and the supported price.

Will the scheme be extended beyond six months?

The scheme is currently scheduled to last for six months but a review will take place, with the results being published within the next three months. Government has said the scheme is for an 'initial' six months. Further support is expected at the end of the scheme to protect sectors at risk, with hospitality specifically named.

Is this the only support available?

This support specifically targets business energy prices. An Energy Price Guarantee has been provided to households to shield them from very high prices. PASC UK is pushing for additional support measures, including a reduction in the rate of VAT for the sector and a business rates holiday.

I am on a fixed price contract, how much will I pay?

Your bill will be reduced by a discount (per kWh) equivalent to the Support Price and the price of wholesale energy on the day that your contract was agreed.

As an example:

Fixed price agreed: 70p/kWh electricity

Wholesale price on day of fix: 35p/kWh electricity

Supported wholesale price: 21.1p/kWh electricity

Discount of 35 minus 21.1 p/kWh = 13.9p/kWh

Fixed price of 70 minus 13.9p/kWh = **56.1p/kWh = the rate paid**

I am on a variable tariff, how much will I pay?

Your supplier will set the variable price and a discount will apply to those for each unit of energy. The discount will be set at a maximum level of the difference between the Supported Price and the average expected wholesale price – which will be set on 30th September. Your price will fluctuate throughout the period as the discount changes.

I have hedged my prices this winter, what does that mean for my prices?

A discount will be applied based on the difference between your monthly weighted average

baseload price and the supported price. A maximum discount will apply.

(Thanks to UKH for the above information).

MAJOR COUNCIL INTERVENTION ON HOLIDAY LETS ON ISLE OF WIGHT

This last week has seen a major intervention by the Council on the Isle of Wight that will impact a huge proportion of self-caterers on the island.

Essentially, they are seeking to get Council and Planning Inspectorate approval to make it mandatory for all holiday lets, operating for more than 140 days per year, to apply for Planning Permission to operate as holiday lets.

Firstly, it's worth noting that on an individual basis it is possible for a Council to insist on an individual owner applying for a change of use, whereby the obvious primary use is commercial, holiday lets, not residential. We have heard of this particularly where properties in residential areas have caused local noise disruption. Unsurprisingly in those cases, planning to operate as a holiday let is rarely given.

It's a theme that we are going to see repeated across England, Wales and Scotland are already either putting Licensing into effect or plan to do so. This is not dissimilar but more by the back door.

We are seeking more detail on this intervention, and to see the working papers and evidence that The Isle of Wight Council and will give a fuller update as soon as possible. I have not been able to find the details of this on the Isle of Wight Council website pre publishing this newsletter, just newspaper reports from Members.

This should be of concern to all operators that operate under Residential Planning consent, especially in the more toxic areas of England, such as Cornwall, Cumbria and the East Coast.

Further update next week. Here's the newspaper article,:

<https://www.islandecho.co.uk/islands-rental-market-has-shrunk-by-almost-85-since-the-start-of-covid/>

NEW PASC UK WEBINAR PROGRAMME FOR OCT/NOV NEW ONES ADDED

We will be adding to the Webinar programme in October/November over the coming weeks. Previous webinars can be viewed on the PASC UK Website at: <https://www.pascuk.co.uk/webinars/>

APOLOGIES DATE WILL HAVE TO BE CHANGED AGAIN ON ACCESS WEBINAR

1/ WEBINAR ON HOW BECOMING AN ACCESSIBLE BUSINESS CAN BOOST BOOKINGS

Open to all.

Date: NEW DATE TO BE ANNOUNCED SOON

The Accessible market in the UK is substantial, and few owners focus on this area. This webinar will bring together the data on the size of the market, and steps that you can take to be able to offer this as a selling point of your business.

Ross leads on Access at Visit England, Annette is s recognised access expert in Hospitality and both Diane and Cheryl run award winning accessible accommodation and will all be able to share their tips on how to either enter or improve your offer to serve this market.

Chair: Alistair Handyside, PASC UK

Speakers:

- Ross Calladine, Head of Business Support. Visit England.
- Diane Howarth. Owner. Cottage in The Dales
- Cheryl Dixon. Owner. Northayne Holiday Cottages
- Annette Burgess. Visit England Assessment Services

**This webinar will be recorded and placed on the PASC UK website
Open to all readers of this newsletter.**

Topic: PASC UK Visit England Accessible Webinar

Register in advance for this webinar:

https://us06web.zoom.us/webinar/register/WN_Dflqt_88So-bj-FI5dtvHg

After registering, you will receive a confirmation email containing information about joining the webinar.

2/ OPEN WEBINAR TO UPDATE SELF-CATERING IN WALES

Open to all. Will recorded and placed on the PASC UK website

Date: Monday 17th October 2022 1100-1230

This webinar will cover all the various interventions that the Welsh Government has introduced this year, including the 182-day rule, Tourism Levy, changes to how Business Rates are assessed and the recent fiasco about charging businesses for Council Tax during the pandemic. We will bring together a panel to update you on what is happening, what is being done about and what operators can do to help. Limited to first 500 registering.

Panel:

- Adrian Greason Walker, Director Wales Tourism Alliance
- David Chapman, Director UKH Wales Branch
- Alistair Handyside, Chair PASC UK
- More TBA

Register in advance for this webinar:

https://us06web.zoom.us/webinar/register/WN_2igvfKyRTeuk-dtVq7KNVQ

After registering you will receive a confirmation email containing information about joining the webinar.

3/ MEMBERS MEETING ON SETTING PRICES

Members only, will be recorded for Members.

Date: Wednesday 19th October 2022 1100-1200

This meeting will cover various strategies to help Members set their pricing going forwards. We will be pulling together a panel of experts to guide Members through these. Limited to first 100 registering.

Panel:

- Alistair Handyside, Chair PASC UK
- Robert Kennedy, Director SuperControl
- Kelly Odor, Marketing Director, Bookster
- Further panellists TBC

Register in advance for this meeting:

<https://us06web.zoom.us/meeting/register/tZUvce6hpjovHNNYWzclsslxB1gJm3BIsiZl>

After registering, you will receive a confirmation email containing information about joining the meeting.

4/ MEMBERS MEETING ON GUEST COMPLAINTS AND GUEST BEHAVIOUR 2022 STYLE

Members only, will be recorded for Members.

Date: Tuesday 25th October 2022 1100-1200

There does seem to have been a significant change in guest behaviour post reopening after the pandemic. Much more on this next week. This Members meeting will try and cover the various aspects of this, what should be in your Terms and Conditions, what effect 'Rules' might have and how to prepare strategies in the event of complaints or problems with guests. Limited to 100 Members, first come first served.

Panel:

- Alistair Handyside, Chair PASC UK
- Tom Chartres Moore, Partner, Stephens Scown Solicitors
- Further panellists TBC

Register in advance for this meeting:

<https://us06web.zoom.us/meeting/register/tZMpduChpj0tHtMaCcmicPAyYuaR86FqFaJQ>

After registering you will receive a confirmation email containing information about joining the meeting

5/ GENERAL MEETING ON SETTING PRICES

Open to all. Will recorded and placed on the PASC UK website

Date: Thursday 27th October 2022 1100-1200

This webinar will cover various strategies to help Members set their pricing going forwards. We will be pulling together a panel of experts to guide Members through these. Limited to first 500 registering.

Panel:

- Alistair Handyside, Chair PASC UK
- Robert Kennedy, Director SuperControl
- Kelly Odor, Marketing Director, Bookster
- Further panellists TBC

Register in advance for this webinar:

https://us06web.zoom.us/webinar/register/WN_icahhRTNQ7OcdurXhmsclQ

After registering you will receive a confirmation email containing information about joining the webinar.

MPLC CHASING FOR PAYMENT

We have been notified that MPLC are chasing self-catering businesses to pay their licence, this is in addition to a TV licence and any licence that you may have to pay PRS/PPL above.

PASC UK have not had any direct negotiations with MPLC as we have with PRS/PPL primarily because we have not had any Members notifying us of demands being made to them to pay up.

We contacted UK Hospitality who have been leading on negotiations with MPLC to get an update on the situation, and it does not make great reading. Essentially MPLC are maintaining that we do need these licences. You can see the full correspondence from UKH below. We will follow up again when back from leave and try and establish what the fees payable may be.

Dear Alistair,

In a time of rising costs, we are aware that many of our members are being contacted by MPLC to arrange payments for the use of television and visual content. As you may know, there is a difference of opinion between MPLC and the hospitality sector around one of the tariffs being presented to hospitality businesses at the moment.

There are two tariffs MPLC are seeking payment for which are outlined below.

Bar/restaurant tariff

The MPLC tariff quoted as 'bar/restaurant' applies if you have televisions in receptions/lobby/bar areas showing 'film' content to guests and visitors (Film includes pre-recorded TV programmes or motion pictures). Live broadcasts are exempt. For example, a reception / bar area broadcasting rolling news to customers and nothing else would not be liable for the fee (the venue would need to demonstrate that only live broadcast was displayed, for example, staff were made aware that only live content was allowed). However, a public bar/lobby area which was showing pre-recorded TV programmes and/or motion pictures with copyright that is covered by MPLC's member companies could be liable to pay the fee.

Guest room tariff

The MPLC tariff quoted as 'Hotel / Guest bedrooms' is more complicated and this is where UKH and other trade bodies have a difference of opinion with MPLC.

MPLC state that 'MPLC licence for Hotel/Guest Bedrooms is required in addition to the TV Licence and any other MPLC licence you may already hold for communal areas such as the bar, guest lounge, the gym or reception'. The difference of opinion between MPLC and trade bodies lies around whether a hotel room is considered a public or private place for the purposes of the specific element of broadcast that they are claiming for (section 19 of the Copyright Act – 'performance of the copyrighted work in public'). To date, there has not been any court case to definitively settle the matter.

UKH and other trade bodies, do not agree with MPLC that they have an absolute right to collect copyright payments for guest bedrooms in the way they are claiming. We believe the legal case to do so is uncertain. Although UKH have sought legal opinion to help clarify the situation we have been unable to arrive at any definitive position yet, largely because this is still relatively new in UK copyright law with no case precedent in the UK to which to refer.

However, **at present it is down to individual venues as to whether to decide to pay or not for guest bedrooms**, as only the venues will be aware of whether content falling within MPLC's claims are broadcast on site.

Although MPLC relented from pursuing claims during the closures forced by the pandemic, little has legally changed on this matter since Covid struck and now trading has resumed, so has the debate! This issue remains a priority area for UKH to pursue, we are in active discussions with the Intellectual Property Office currently and continue to seek clarity and resolution on this issue. Due to the lack of case precedent, UKH are not able to offer legal advice to members on this matter at present, and none of the information above should be regarded as this.

In October last year a UKHospitality podcast discussed the MPLC issue - although we are still on a journey to resolving the issues around the topic, you may be interested in listening to the discussion around it which can be found on the UKH podcast player listed as S4, Episode 3 – or [listen here](#).

WALES UPDATE

If you are affected by what is happening in Wales and do not get the direct Wales only communications, please email me at chair@pascuk.co.uk , put Wales Newsletter in the subject line and we will add you to the Wales Only circulation list.

VIRTUAL MEETING ON TOURISM TAX WITH WELSH GOVERNMENT

Alongside the various face to face meetings being held with the Welsh Government on the Tourism Tax, (PASC UK or PASC UK Members will be present at all of these) the Welsh Government has announced a virtual zoom style meeting.

This will be on the 27 October from 0930-1100

To register your interest, please email visitorlevy@gov.wales giving your name, business name and contact details.

We urge as many of you as possible to sign up for this, and to look at the briefing notes below in the section announcing the launch of this consultation.

Their notice is as follows:

The Welsh Government is holding a virtual session on [the visitor levy consultation](#) on **Thursday 27 October, 9.30am - 11:00am**. This is intended to cover the same information about the consultation as will be given during the four in-person events taking place over the coming weeks and includes an opportunity to put questions to Welsh Government officials.

If you are interested in attending, please email visitorlevy@gov.wales to register your interest and enable the team to determine the appropriate technological solution depending on the numbers attending.

WALES VALUATION OFFICE OUTRAGE UPDATE

We have been chasing the Welsh Government and VOA on this since first reported. So far nothing from Rebecca Evans, so that is the number one priority.

We have heard from the VOA, who are, of course, just doing their job by the letter of the 70-day legislation.

We are also seeking to find someone who fully understands the process of making Appeals to local councils on this, to use their discretionary powers, to write a short paper for Members to be able to make speedy appeals to try and get the decision reversed.

If anyone thinks they could do this, or knows someone that can, let us know. PASC UK would be willing to pay for the creation of this paper. Please contact me urgently at chair@pascuk.co.uk if you can help in any way.

We will also be following up on trying to get clarity on when the 182-day regime formally starts, Rebecca Evans has said it is from April 2022, which would of course be retrospective, and we continue to advise owners that they should assume that this is the case, and do everything possible to achieve 182 days before the end of March 2023. This would ensure that you remained on Business Rates.

However, the Welsh Government page on self-catering Business Rates, which can be found here: https://businesswales.gov.wales/non-domestic-rates-self-catering-properties-wales?fbclid=IwAR1XuSykwmwzo3XttnyQH-EFxmC6ahq9P9s3q-Vp_CFXlQoWbClbY7DvG0T8

This has not been updated properly in our view and we will be challenging it.

What it does have is this section, which is why we need to help on how best to try and appeal decisions on not achieving 70 days in Covid.

What if my property does not meet the criteria due to exceptional circumstances?

If your property is unavailable to let for 140 days or not actually let for 70 days due to adverse or unforeseen circumstances, such as flooding, which has resulted in damage to the building, this could result in your property being classed as domestic and therefore subject to an assessment for council tax.

A property classed as a domestic property would be subject to all the exemptions and discounts available in relation to council tax. For example, article 3 of the Council Tax (Exempt Dwellings) Order 1992 provides for circumstances where a dwelling is to be exempt from Council Tax. Class A provides that a dwelling that is vacant, substantially unfurnished and requires or is undergoing major repair work or structural alteration is exempt for a period of 12 months. Class C provides an exemption for properties which have been empty for a continuous period of less than six months and are substantially unfurnished.

Local authorities also have discretionary powers under section 13A(1)(c) of the Local Government Finance Act 1992 to reduce council tax bills for properties by any amount (including reducing a bill to zero). You should contact your local authority in this instance who can advise if you are eligible for such a council tax exemption, discount or discretionary relief.

If your property comes back into use as a self-catering let and you can provide evidence to support 140 days available to let and 70 days of actual lettings in the previous 12 months, you can apply to the VOA to be reassessed for non-domestic rating purposes.

We continue to chase up on all the actions detail below.

As covered last week (27 Sept), the Wales Valuation Office have been sending notifications out over recent days regarding the period April 2020 to March 2021 saying that business have been taken off the Business Rates list for not complying with the required 70 days let during Covid.

This was the period of regular lockdowns, Tier restrictions, and County Restrictions as well as group sizes, remember 'one household' and the Rule of six?

A quick check shows that there were less than 80 days available to most businesses in Wales and less if you were a larger property. All Welsh self-catering business were unable to comply with being available to rent for 140 days, there just weren't enough legal open days to do this.

Businesses have been contacted notifying them that as they did not achieve 70 days let in this period then they are automatically reverted to Council Tax, and Council tax bills are now payable immediately. (One received was for £12,000).

Please can you send any supporting evidence of this at once to chair@pascuk.co.uk and put Wales 70 Days in the subject line? We will use to build our case against this completely immoral action by the Welsh Government.

What happens this week as a result?

1/ We have gathered the data on what dates businesses were actually closed by law during the period, and what restrictions were in place when allowed to trade. The example below shows the Conwy example. Other Counties had local lockdowns too.

Lockdown	23-Mar	Days Lost	Local lockdowns	Additional Days Lost	No Travel into Wales Restricted travel within Wales	Highly restricted days lost
			e.g Conwy			
Apr-20	Lockdown	30				
May	Lockdown	31				
June	Lockdown	30				
July	Opened 11.7	10				
August	Open	0				
September	Open					
October	Closed 23.10 - 5.11	9	1.10 - 14.10	13	From 14.10	9
November	Closed 5.11	30				
December	Open 2.12, Closed 19.12	15			From 4.12 - 19.12	15
Jan-21	Lockdown	31				
February	Lockdown	28				
March	Lockdown	31				
Total Lockdown		245		13		24
Year Total		365				
Total Days lost/heavily restricted		282				
Free to trade		83				

2/ This evidence will be presented at the Wales Rate Payer Forum last Wednesday and we received the usual promises of looking into it and getting back to us.

3/ One of our close colleagues had a meeting with Vaughn Gethin on Wednesday where this was brought up repeatedly. He too promised to get his team to look into it.

4/ We had a Wales Tourism Alliance Meeting on Thursday where this was top of the agenda and a series of actions were agreed.

5/ As a result, last Thursday, prior to your Chair going on leave, we wrote as PASC UK, UK Hospitality Cymru, and the Wales Tourism Alliance to Rebecca Evans, the Welsh Valuation Office and THE Welsh Local Government Association to demand that this disgusting decision is reversed and insist upon a meeting.

As soon as we have any feedback, we will let you know.

VISIT WALES MARKETING INDUSTRY UPDATE

Date: 13 October 2022

Time: 1030 -1200

PASC UK urges as many Members as possible in Wales to register for this meeting and to use the question session to challenge Visit Wales on specifically what they are doing to help Welsh self-catering businesses get past the 182-day threshold. The more of you that attend and ask this question, the more likely we are to be able to pressure them into doing something to support the sector. It's first come, first served by this Friday, 7th October at 3:00 pm.

Register here: <https://wales.business-events.org.uk/en/events/visit-wales-marketing-industry-update/>

This is their press release:

Registration is now open for the Visit Wales online session where businesses will have the opportunity to hear about marketing activity over the autumn and winter period.

The session will take place via MS Teams on 13 October 2022 from 10.30am to 12pm.

Join to hear us running through our "above the line" (ATL) marketing activity, introducing the Themed Year for 2023 - carefully chosen to enable every destination and product in Wales to take part and work together in promoting Wales – and taking attendees through our industry guide, which will be available online.

The session will also include updates and overviews of:

- Autumn and Winter consumer campaigns
- Themed Year for 2023
- Travel Trade and Business Events activity
- World Cup activity
- Consumer audiences being targeted over the next 6 months

Businesses will have the opportunity to raise questions during a short Question and Answer session.

Resources will be available to all those attending including a breakdown of audience types and an Industry guide for the themed year 2023.

Please register to join us by 3:00pm, 7 October on:

<https://wales.business-events.org.uk/en/events/visit-wales-marketing-industry-update/>

Places will be allocated on a first come first served basis and all attendees will receive a meeting link prior to the event.

TWO NEW GOVERNMENT CONSULTATIONS IN WALES REPEAT

Tourism Tax Consultation Launched in Wales

The Welsh Government launched a 12-week consultation into what they are calling a 'discretionary visitor levy for local authorities'.

We recommend that those wishing to submit responses hang fire for the next few weeks. There are meetings going on with businesses and Associations with the Welsh Government on this tax, and we will be providing notes and guidance on helping answer the questions posed by the consultation.

For clarity PASC UK is 100% opposed to the introduction of a visitor levy.

More information here: <https://gov.wales/visitor-levy>

Here are some thoughts on why it is a really bad idea. Feel free to feedback and comment to chair@pascuk.co.uk

Why is it a Bed Tax?

All the evidence shows that pressure on local services is caused by the day visitor, not the staying visitor. Yet only the overnight stays will be taxed.

Why are you even thinking about introducing it now?

Consumer confidence is at its lowest ebb for 50 years, inflation is rampant and bookings are already slowing dramatically.

Does the Government not understand the 'market rate'?

Consumers do not, and have no need to, understand what makes up a price for accommodation. The market price is a UK price, a budget for a family holiday in most cases. Charge more than the market price and guests will look elsewhere. Operators who are registered for VAT have to include that in the price, they cannot charge more, if a business actually pays Business Rates, it does not mean they can charge more. The same will apply to any Levy, which will have to be absorbed by the businesses themselves

How much will it be?

Charging £5 per person per night at an expensive hotel in Cardiff may not have a huge impact, but the same levy on a sleeps six holiday cottage would add £210 to a family holiday for a week. This is utterly unsustainable.

Who will it apply to?

Will it be for only those over 16? How will this be checked?

What about the Online Travel Agents?

How can operators be sure that if it is introduced it's a level playing field and that off-grid operators on these platforms will have to pay it to?

Competitive disadvantage

The imposition of such a tax will make Wales look more expensive than other parts of the UK. Consumers will think that they have to pay a tax to visit and stay. The market price covered elsewhere is no respecter of boundaries. The imposition of this tax will reduce tourism in Wales.

Impact on the visitor economy

The Wales tourism industry is largely made up of micro businesses/SMEs and the sector is vitally important to rural as well as urban economies, enhancing the provision of facilities and amenities, which are accessed by residents and visitors alike. In Wales, 25% of all VAT registered businesses are in the visitor economy, which has proved to be highly resilient in the face of austerity, offering significant employment opportunities where alternatives are very limited. Adding the burden of charging, absorbing, and collecting the tax is an ill-considered intervention at this time particularly.

Why has Plaid Cymru changed its view?

Recognising the VAT tax burden, Plaid Cymru's 2017 manifesto included a reduction in tourism VAT to 5% as an explicit policy, stating that existing tourism taxes are "unfair". Why the turnaround now in 2022?

Negative publicity

The imposition of an additional tax has major implications for Brand Wales and for already marginalised groups in society. A Welsh tourism tax would generate significant negative PR along the lines of 'paying for the privilege to holiday in Wales'. Wales' experience of the Severn Bridge tolls underlines this, highlighting the dampening effect of tolls on visitor numbers, trade and traffic.

Welsh Government plans to reform Business Rates.

This one is about reforming Business Rates. Launched last week it will also run for twelve weeks, so once again we have time to get our arguments and concerns lined up, and PASC UK will provide notes and guidance on responding.

We should be very wary of point 4. The review of reliefs..... the likelihood of self-catering continuing to benefit from Small Business Rates Relief seems unlikely.

The statement says....

The consultation covers a wide range of improvements to the NDR system in Wales. Our proposals include the following.

1/More frequent revaluation cycles, a change which many stakeholders have been calling for to ensure that rates valuations more accurately reflect up-to-date market conditions, along with additional measures necessary to support this.

2/ Improving the flow of information between government and ratepayers, taking advantage of digital services.

3/ Providing the Welsh Government with more flexible legislation to amend reliefs and exemptions in future years.

4/ A review of reliefs and exemptions to ensure the arrangements align with our Programme for Government commitments and the available support is targeted in the most effective way.

5/ Providing greater scope to vary the multiplier to help align annual increases with our economic development priorities.

6/ Improving the administration of valuation functions and rating lists to streamline processes and reduce the burden on government and ratepayers.

7/ Further measures to ensure we can continue tackling avoidance.

More information here: <https://gov.wales/reforming-non-domestic-rates-wales>

NEWSLETTER INDEX (WHERE TO FIND PREVIOUS INFORMATION)

All previous content is indexed and can be found on the 2022 Index on the Newsletter page. Look for PASC UK Index 2022. This will be updated weekly.

<https://www.pascuk.co.uk/newsletters/>

GENERAL INFORMATION SECTION

PASC UK SOCIAL MEDIA

Please consider following PASC UK on Social Media, it gives us a way to contact you quickly in the event of any changes or announcements that are made. We promise not to bombard you and to try to keep it relevant and topical.

PASC UK on Twitter @PascUK

PASC UK on Facebook @pascukltd

This is where the latest news between newsletters gets posted.

MEMBERS AREA IS NOW LIVE

The Members area of the PASC UK website opened last week. Initially you will be able to check your account details and download any of the 25 Members only PASC UK papers. No longer will you need to ask Justin or myself 😊. The full list of the PASC UK Members Papers is detailed below. No longer will you need to ask Justin or myself 😊 We will add additional features over the next couple of weeks.

Anticipated questions:

1/ How do I log in?

On the main PASC website you will see a link in the top right-hand corner called "Member Login". Click this link and enter your email address and password. Once logged in you will be in the members area.

2/ I can't find my password.

Click on the "Member login" link on the far right of the menu on our website and click the "forgot password" link which is in blue text just below the "log in" button. Enter your email address in the field and click "request password reset" button.

3/ Who do I contact if I cannot get in?

If you are having difficulty, please email admin@pascuk.co.uk and Justin will investigate for you.

4/ My username doesn't match my email address, does it matter?

No, it doesn't, usually your username would be your email address, but through address changes and mis-typing, some don't match up. However, the only place those are used is in the login field, all correspondence will go to your usual email address. Unfortunately, it isn't possible to change the username once it has been set.

PASC UK MEMBERS ONLY PAPERS

This is the current list of Members Only papers available in the Members area of the website.

- [PASC UK Business Rates Claim Note England](#)

A guide to 'Claiming' your property in England. You cannot 'check' You cannot 'Check' your properties Business Rates until you have done this.

- [PASC UK Business Rates Check Note England](#)

The guide will take you through 'checking' your Business Rates in England. It is vital that you book a call with the Chair before completing and submitting this 'Check'.

- [PASC UK Template Privacy Policy June 2022](#)

All businesses in the UK are required to have an up-to-date Privacy and Cookie. Not having one can lead to fines. This document provides you with a template policy.

- [PASC UK Template, Privacy Policies explained June 22](#)

This document explains Privacy Policies

- [PASC UK Template Cookie Policy and Guidance June 22](#)

This document gives further guidance on Cookie and Privacy Policies

- [PASC UK Guidance on using CCTV 2021](#)

Having CCTV at business premises can bring benefits, however there are several stages of legal compliance that you need to go through to operate such a system.

- [PASC UK Template CCTV Policy June 2022](#)

This document provides you with a basic CCTV Template Policy.

- [PASC UK Guidance on completing a short form LIA](#)

A 'Legitimate Interests Assessment' is a requirement if you have CCTV. This will guide you through creating one.

- [PASC UK Template LIA](#)

This document is a template Legitimate Interests Assessment for CCTV

- [PASC UK Template Breach Risk Assessment \(Req if you have a GDPR breach\)](#)

This template will guide you through the steps to take if you have a breach of GDPR.

- [PASC UK Record of Processing \(This is what data that you store and for how long?\)](#)

This template gives you the headings for the types of data that you store and for how long.

- [PASC UK Template Internet Fair Usage Policy](#)

This template document can be inserted into your Terms and Conditions to cover fair internet usage at your business.

- [PASC UK EV Charging Guidance](#)

This guidance takes you through putting together an EV Charging Policy at your business, necessary even if you do not have EV charge points, to help protect against charging out of the window.

- [PASC UK EV Charging Policy for Member's T's & C's](#)

This template document can be inserted into your Terms and Conditions to cover EV charging at your business, whether you provide the facility or not so as to help maintain insurance cover.

- [PASC UK Ghosting Report](#)

Ghosting is the practice that is employed by some self-catering agents whereby they leave your property on their website after you have left, with 'this property no longer available' Book one of these. This report tells you the steps you can take to have the property removed.

- [PASC UK Risk summary of 3rd Party suppliers at Holiday lets](#)

Having third party suppliers giving services to our guests at our businesses requires careful planning, in order not to void insurance. This paper explains the steps to take to maintain insurance cover. Covers chefs, mobile cooking companies, hot tub rental, bouncy castles. Entertainers etc.

- [PASC UK ICO Registration Paper](#)

This paper explains whether or not your business needs to register with the ICO. In 99% of cases PASC UK Members will need to do so. It costs £40 to register.

- [PASC UK ICO Registration FAQ's](#)

This document answers the most common questions about registering with the ICO and why you need to.

- [PASC UK Guidance on damage caused by guest and your T's & C's](#)

This document provides Members with another clause for their T's and C's. this one to protect you if guests cause damage to the property such that you have to cancel subsequent bookings and who pays.

- [PASC UK Template for clause in T's C's ref guest damage](#)

This is the template clause to add to your Terms and Conditions to protect you if guest damage causes future cancellations.

- [PASC UK Guest Comms Paper](#)

Improving the flow of Guest Communications from initial contact prebooking to post departure is one of the key elements to improving guest satisfaction and driving up repeat bookings. This paper should be taken in conjunction with the webinar on this subject in the Webinars section.

- [PASC UK Influencer Paper](#)

Many Members have reported being contacted by influencer or media offering coverage of your property in exchange for a free stay. There are several legal aspects to Members being offered this that they need to be aware of. These are covered in this Paper.

PASC UK MEMBERS LOGO UPDATED

We have updated the logos for Members to display on their websites. We now have a full set of Welsh versions too. A full variety of shapes and formats are available to suit all layouts.



MEMBER BENEFITS SUMMARISED

To carry out the lobbying work that we do on behalf of the Sector we need funding. 90% plus of this funding comes from Membership Subscriptions.

Members will get.

- Access to Telephone Support
- Prompt email support
- Access to Members Benefits and Discounts. (Buying Group Membership details below)
- Members only Webinars, (Including ask the Chair sessions)
- Book Surgery Appointments with the Chair
- Specific Discounts on key products
- PASC UK Guides to reducing Business Rates
- Hard Copy of the Visit England Pink Book
- 25 and growing Special Interest Papers including legal docs such Privacy and Cookie Policies

What will be available to non-members?

- The PASC UK Covid newsletters
- Email support when available. (Members support comes first).
- Free Webinars
- Cleaning protocols
- Some General interest Papers

We are currently making major investments in supporting you better and all this costs money, these include.

- Sponsorship of the Visit England Pink book, to help promote the safe and legal aspects of our sector
- Membership fees to the Tourism Alliance, UK Hospitality and Wales Tourism Alliance
- Surveys and reports to use data-based arguments to win support for the sector
- Legal papers to help inform and protect Members.

If you have not yet joined PASC UK, please consider joining NOW. Details below the Buying Club information. <https://bit.ly/3ptd4RU> Thanks.

BUYING CLUB MEMBER BENEFIT FOR PAID PASC UK MEMBERS

We are really pleased to announce a partnership with Purchasing for Business.

More details on the new PASC UK website here: <https://bit.ly/3ptd4RU>

This is a Buying Club, it's free to join if you are a paid up PASC UK Member. There will be no additional fee for Members to join the Club.

SUPPORT LOBBYING BY JOINING PASC UK

There is a huge amount of work and lobbying to do to help support you all in the self-catering sector. We don't ask very often, however, if we are to fight on so many fronts, we simply need more funds. There are thousands of you that have had the benefit of this newsletter and the lobbying done on behalf of the sector.

We are now asking that as many of you as possible join PASC UK. The fight is on so many fronts, and we get much better results when we engage proper legal advice and proper PR firms to assist with campaigns. Memberships to other organisations that provide common lobbying, information feeds and support also cost many thousands of pounds a year.

Membership fees are as follows: All per annum.

- Single cottage £70
- 2 – 4 Units £125
- 5 – 10 Units £200
- 11 + Units £300

For companies like cleaning firms, or industry support companies, Trade Membership is £200, and you will get a listing in the Trade Directory on the new website.

Members get telephone support and priority email support.

You can join here, simple form, takes 2 mins, and you'll get an invoice, payable by BACS or Credit Card. Just click on this link to go to the joining page: <https://www.pascuk.co.uk/join-us/>

Wishing each and every one of you all the best during these trying times.

Best regards

Alistair Handyside MBE
Executive Chair
The Professional Association of Self-Caterers UK
www.pascuk.co.uk
chair@pascuk.co.uk
07771 678028



Professional Association of Self-Caterers UK

DISCLAIMER

We are in completely uncharted territory here, and any suggestions that we make are merely that and you should carefully consider your own business policies, and if necessary, consult with your Professional Advisors. PASC is your lobbying Association, not a legal service. In addition, please be very wary of some of the advice given on internet communities, blogs and social media. There appear to be thousands of experts out there where my understanding is that there are very few.

To that end, any information you get from any source you must double check. I will always try and put the actual link to the information in the newsletters so that you can read and assess yourselves. These are unprecedented times, please take exceptional care.