

# PASC UK

## Policy on Statutory Registration April 2023

### Introduction

Despite some issues with the questions and Scope in the Consultation, which was published before we could conclude our meetings, and has excluded professional self-caterers, bed and breakfasts and asks further questions about exemption for many more who let property for money, these are the headlines that will form the basis of the PASC UK suggested responses to the Statutory Registration Consultation. We understand that this is in line with the primary hospitality associations.

### Conclusion of base policies regarding the Statutory Registration Consultation.

**All paid accommodation has to register**

**The Statutory Registration Scheme must be all-England**

**Registration cycle should be annual**

**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 this vibrant, diverse sector. Notes on each base policy and infographics to illustrate the process of registration follow:

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

All property that is let even for a single night must register. From 1 October 2023 every property, regardless of size, how many days let and where they advertise must have a written Fire Risk Assessment by law. This therefore becomes the base level for Statutory Registration.

It also removes all the potential grey areas. If there are exemptions, such as in the Scope which excludes professional self-caterers (there's no definition) many might claim they did not register because they thought they were 'professional'. If they allow an occasional use, for example room to let, how would this ever be measured? Exemptions will also considerably muddy the water for local data.

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

### Why it must be a National Scheme?

There are three options are in the Consultation, and all that PASC UK works with have been unanimous from the start that the policy must be for an All-England scheme. This has always been about a level playing field for operators on a health and safety basis. Unless it is an All-England Scheme then it will not be able to be used for marketing that accommodation is safe and legal in England. Without it being All-England, there will be no National Data.

**Policy: The Statutory Registration Scheme must be all-England**

### Frequency of Registration

The frequency should be annual because the primary health and safety requirements of a Fire Risk Assessments and a Gas Certificates are annual.

**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 advertising, (platforms can do this and many do display abroad already), nothing actually changes, bad actors can continue to advertise, those that think it does not apply to them continue to advertise and there still is no 'level playing field'.

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

### What might the Registration Process look like?

We have drawn up some infographics to show how we think the online registration process would look. To the tens of thousands of businesses that registered for Visit England's 'Good to Go' Covid Scheme and the AA's 'Covid Confident' this will be very familiar.

**Step 1. Collect Basic Business details.**

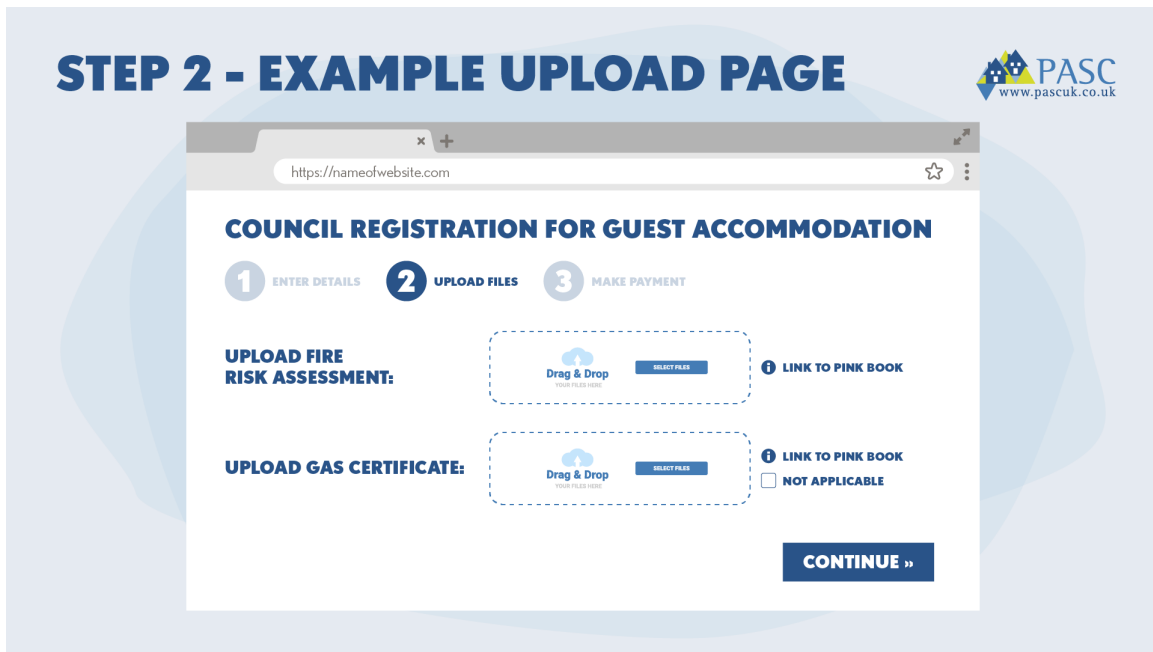
The image shows a screenshot of a web browser displaying a registration form. The page title is "STEP 1 - ENTER DETAILS" in large blue letters. In the top right corner, there is a logo for "PASC" with the website address "www.pascuk.co.uk". The browser's address bar shows "https://nameofwebsite.com". The main heading of the form is "COUNCIL REGISTRATION FOR GUEST ACCOMMODATION". Below this, there are three numbered steps: "1 ENTER DETAILS", "2 UPLOAD FILES", and "3 MAKE PAYMENT". The "1 ENTER DETAILS" step is active. The form contains the following fields: "NAME:", "BUSINESS NAME:", "ADDRESS:", "TOWN:", "POSTCODE:", "COUNCIL TAX NO:", and "OR BUSINESS RATES NO:". A blue "CONTINUE" button is located at the bottom right of the form.

**Step 2.** Provide the required health and safety compliance documents, e.g., Fire Risk Assessment (FRAs), Gas Safety Certificate. We suggest that for further information on legislative issues that there is a link to the relevant section of the online version of the Visit England Pink Book.

<https://www.visitbritain.org/business-advice/know-your-legal-obligations>

We believe in keeping the requested information to a practical minimum, based on actual legal requirements was sensible, and would follow the 'proportionate' approach suggested by the Minister.

However, the Consultation asks if up to 22 pieces of documentation are required, including duplications. Our focus remains primarily around the legal Health and Safety requirements but understand that this Consultation is being launched in parallel with another Consultation where more property details will be required.

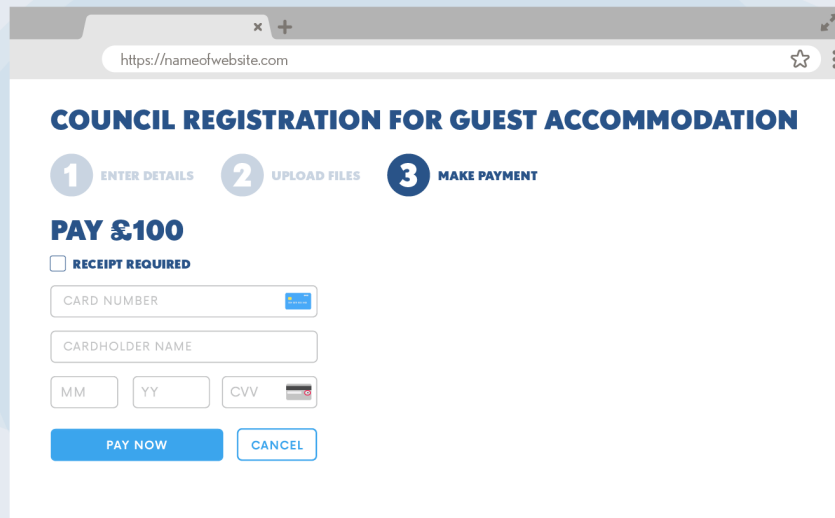


Step 3. It is critical that the scheme is properly financed, otherwise it will just wither and die. Councils shouldn't be asked to manage a scheme from existing budgets when they can't meet Statutory Requirements. Compliant businesses will benefit from the 'levelling of the playing field' and should pay for it.

Fees must be proportionate and £100 per property had long been our maximum fee for this process. (One registration fee per Business Rates Rateable Value (RV) or Council Tax reference number. Larger businesses will have multiple units on one RV or Council Tax Reference, similar to TV licensing).

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

## STEP 3 - MAKE PAYMENT



**COUNCIL REGISTRATION FOR GUEST ACCOMMODATION**

1 ENTER DETAILS 2 UPLOAD FILES 3 MAKE PAYMENT

**PAY £100**

RECEIPT REQUIRED

CARD NUMBER

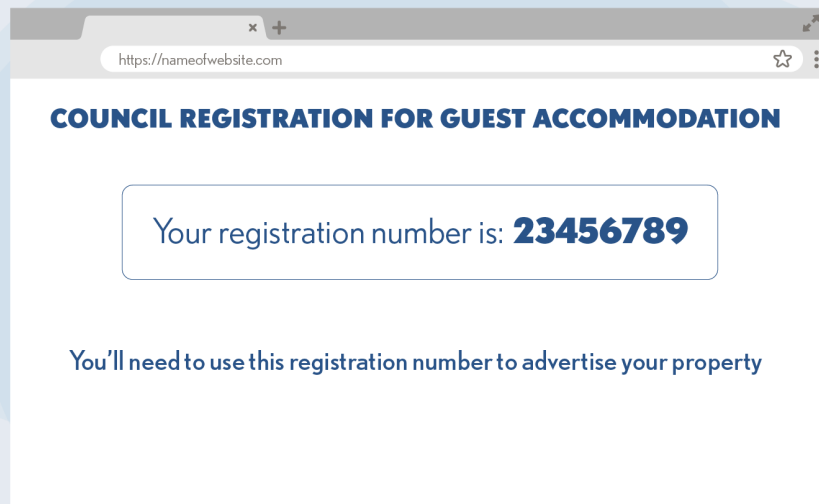
CARDHOLDER NAME

MM YY CVV

PAY NOW CANCEL

**Step 4.** Business receives their Registration Number on completion of provision of documents and successful payment and are free to continue trading displaying their Registration Number.

## SUCCESS



**COUNCIL REGISTRATION FOR GUEST ACCOMMODATION**

Your registration number is: **23456789**

You'll need to use this registration number to advertise your property

### Links to Consultations

The Consultation into a Registration Scheme for Holiday Lets:

<https://www.gov.uk/government/consultations/consultation-on-a-registration-scheme-for-short-term-lets-in-england/consultation-on-a-registration-scheme-for-short-term-lets-in-england>

The Consultation of a use class for short term lets:

<https://www.gov.uk/government/consultations/introduction-of-a-use-class-for-short-term-lets-and-associated-permitted-development-rights/introduction-of-a-use-class-for-short-term-lets-and-associated-permitted-development-rights>

