

# Organisations - Review of the Licensing and Registration of Clubs (Amendment) (Northern Ireland) 2021

## Overview

The Department for Communities is conducting a review of the implementation and effectiveness of those provisions within the [Licensing and Registration of Clubs \(Amendment\) Act \(NI\) 2021](#) <<https://www.legislation.gov.uk/nia/2021/7/contents>> ('the Act') which came into operation on 1 October 2021.

The Act made amendments to both the Licensing (NI) Order 1996 ('the Licensing Order') and the Registration of Clubs (NI) Order 1996 ('the Clubs Order'). The Licensing Order regulates the sale and consumption of alcoholic drinks in licensed premises in Northern Ireland, whilst the Clubs Order regulates the supply and consumption of alcoholic drinks in private members' clubs.

## Survey description

The Act placed a requirement on the Department for Communities to review and report on the implementation and effectiveness of each of the provisions in Parts 1 and 2 of the Act, as soon as practicable after the third anniversary of the date that provision came into operation. As the Act made many changes to the Licensing Order and the Clubs Order, provisions were commenced in five separate phases.

In order to help the Department to complete the review and report on the implementation and effectiveness of the first phase of changes which commenced on 1 October 2021, surveys have been created to capture views and experiences of these changes.

## Why your views matter

The surveys are aimed at the general public, licence holders and registered club officials. The Department would also be interested in hearing from any other interested parties or organisations for example legal advisors, churches, trade bodies, and health organisations.

This version of the survey is specifically for other interested parties or organisations. Other versions of the survey are available [here](#) <<https://www.communities-ni.gov.uk/consultations/first-review-licensing-and-registration-clubs-amendment-act-northern-ireland-2021>> .

Your responses to this survey will make an important contribution to the Department's report and may help shape future changes to policy and legislation. The survey is expected to take 10 minutes to complete.

## Introduction

### Give us your views

The Department for Communities is seeking your views and experiences of the changes made to liquor licensing and registered clubs legislation which came into operation on 1 October 2021.

The questions have been designed around your response to the opening question below and will guide you through the survey from your point of view as an organisation. You do not have to answer every question, just those you feel are relevant to you.

### Privacy, Confidentiality and Access to Survey Responses

This survey does not ask you for any personal information such as name and contact details, and as such we would also be grateful if you do not provide any other personal or identifying information.

Your response, and all other responses to this survey, may also be disclosed on request in accordance with the Freedom of Information Act 2000 (FOIA) and the Environmental Information Regulations 2004 (EIR). However, all disclosures will be in line with the requirements of the Data Protection Act 2018 (DPA) and the UK General Data Protection Regulation (UK GDPR).

Please read the Department's [Privacy Notice](#) <<https://www.communities-ni.gov.uk/dfc-privacy-notice>> before completing this survey.

## 1 Please indicate in what capacity you are completing this survey.

Please select only one item

- Individual/member of public
- Organisation X**
- Licence holder
- An official of a registered club (private members' club registered to supply alcoholic drinks to its members and guests)

## Type of organisation

### 1a Please state the type of organisation you are responding on behalf of.

Please select only one item

- Legal advisor
- Church
- Trade body
- Health X**
- Other (please state which type below)

## Sections 1 and 30 - Removal of additional restrictions at Easter

This section of the Act deals with the hours during which alcoholic drinks can be sold in licensed premises or supplied in registered clubs throughout the Easter weekend. Additional restrictions previously in place included that late licences could not be granted past midnight the day before Good Friday, on Good Friday itself alcoholic drinks could only be served in licensed premises and supplied in registered clubs between 5:00pm and 11:00pm, and off-licences were not allowed to open Easter Sunday. However, since Easter 2022, the additional restrictions relating to the opening hours for licensed premises and registered clubs over the Easter weekend have been removed and opening hours are now the same as every other weekend throughout the year.

Licensed premises and registered clubs may now serve alcoholic drinks from 11:30am on Good Friday and off-licences may open on Easter Sunday from 10:00am until 10:00pm.

The aim of this section was to:

bring Easter weekend opening hours in line with the rest of the United Kingdom and the Republic of Ireland; make Northern Ireland more attractive for people who are visiting or planning to visit Northern Ireland; and assist the hospitality sector who had reported significant loss of revenue over this weekend.

### 2 Based on the experience(s) of your organisation, do you think the policy aims of this section have been met?

*Please select only one item*

- Yes
- No
- Don't know X**

Provide a brief explanation for your answer below.

**We have no outcome information as to the effect of increased opening hours. It is unlikely that there is sufficient evidence to support or oppose modest changes to alcohol accessibility. However, strong evidence shows that increasing access to alcohol through more outlets & longer trading hours contributes to alcohol related harm. Conversely restricting the availability is associated with reducing harm. In a society where the cost of alcohol related harm is extreme, these principles must be integrated into such planning and decision making around alcohol law. Alcohol related harm creates numerous negative mental, physical & social effects.**

## Sections 2 and 31 – Removal of restrictions on late opening on Sunday

The Act changed the permitted hours alcoholic drinks could be sold in certain licensed premises and supplied in registered clubs for consumption on the premises on a Sunday night. Premises licensed to sell for consumption on the premises and registered clubs could only remain open on a Sunday night until 10:00pm under general permitted hours, or midnight with additional permitted hours or an authorisation for a special occasion.

Certain licensed premises and registered clubs can now open until 11:00pm on a Sunday night under general permitted hours and 1:00am the following morning with additional permitted hours or an authorisation for a special occasion. Larger pubs (which are structurally adapted to provide substantial refreshment and/or entertainment) and hotels can also open until 2:00am the following morning with further additional permitted hours.

The aim of this section was to modernise the law to allow premises to react to changing local and international consumer behaviours and expectations.

### 3 Based on the experience(s) of your organisation, do you think the policy aims of this section have been met?

*Please select only one item*

- Yes No
- Don't know X**
- Provide a brief explanation for your answer below.

**Our organisation is not aware of any evidence that has been obtained to monitor the effects of this extension. However, in practical terms it is likely that longer opening hours will be associated with increased amount of alcohol consumed and increased levels of intoxication. We are aware of the association between alcohol and health related harm, crime and disorder and threats to public safety.**

### Section 3 – Public houses and hotels: further additional hours

This section of the Act allows certain larger pubs (which are structurally adapted to provide substantial refreshment and/or entertainment) and hotels, which already hold a court order permitting late opening until 1:00am on a regular basis, to apply to a court for a further additional hour, allowing them to sell alcoholic drinks until 2:00am (or for an additional three hours, from 11:00pm until 2:00am, on nights not previously granted by a court), up to 104 times per year.

Safeguards have also been put in place for residents living in the vicinity of premises which are granted a court order to open until 2:00am, allowing them to raise an objection or, if they have been inconvenienced by, for example, disorder or noise nuisance, a complaint.

If an objection is received a court order may not be granted for the late-night opening, or it may be revoked.

If a complaint is upheld, the court order may be revoked, modified or terms and conditions may be added

to it. The aim of this section was to:

modernise the law to allow premises to react to changing local and international consumer behaviours and expectations; enhance the night-time economy;

assist the hospitality industry in its recovery following the impact of the COVID-19 pandemic; and

provide safeguards to residents in the vicinity of licensed premises who may be affected by the later 2:00am opening.

#### 4 Based on the experience(s) of your organisation, do you think the policy aims of this section have been met?

*Please select only one item*

Yes

No

**Don't know X**

Provide a brief explanation for your answer below.

**It is not clear what the impact of this has been on drinking patterns. However, with longer hours available to drink, it is likely consumption will increase. We appreciate the desire to support the economy, to cater for tourism and to allow more individual freedom of choice. However, alcohol excess in NI is associated with higher levels of harm than in other parts of Europe and it is a health priority to tackle alcohol related harms. Increasing the availability and access to alcohol does not chime with this objective. We very much support Minimum Unit Pricing of alcohol which aims to reduce accessibility to large quantities of cheap alcohol.**

### Section 4 – Alignment of closing time for liquor and entertainment

This change in the Act ensures that entertainment provided in licensed premises during later opening until 1:00am, or further later opening until 2:00am, cannot continue past the end of drinking-up time\*. If a licence holder wishes to continue entertainment beyond drinking-up time, then any order granted for later opening or further later opening is invalidated, and the sale of alcoholic drinks must stop at 11:00pm.

The aim of this section was to:

prevent illegal sales of alcoholic drinks when entertainment continued after drinking-up time;

and assist the PSNI in enforcing liquor licensing legislation.

\* Drinking-up time is the term used for the period of 60 minutes after the hours permitting the sale or supply of alcoholic drinks have ended, where alcoholic drinks may still be consumed.

#### 5 Based on the experience(s) of your organisation, do you think the policy aims of this section have been met?

*Please select only one item*

Yes

No

**Don't know X**

Provide a brief explanation for your answer below.

## Section 5 - Police authorisations for additional hours

Before the Act made changes to the licensing law, the police could already provide small pubs with an authorisation permitting the sale of alcoholic drinks until 1:00am. This section made two further changes:

certain larger pubs, which had been granted permission by a court to sell alcoholic drinks on a regular basis until 1:00am, may now also apply to the police for 20 additional occasions per year on an ad-hoc basis. These licensed premises must continue to provide entertainment and/or substantial refreshment on the ad-hoc nights authorised by the police; and

it increased the number of times smaller pubs (which are not structurally adapted to provide entertainment or serve meals and cannot apply to a court to sell alcoholic drinks until 1:00am) can apply to the police to sell alcoholic drinks until 1.00am from 20 occasions per year to 104.

Safeguards were also put in place allowing complaints to be made to the court if the business was conducted in such a manner to cause undue inconvenience to local residents, or if the hours caused undue inconvenience to residents living in the vicinity of the licensed premises.

If a complaint is upheld, the authorisation may be revoked, modified or terms and conditions may be added to it.

The aim of this section in respect of larger pubs and hotels was to:

provide flexibility with applications for late-night opening for important, but unexpected events, on an ad-hoc basis on 20 additional occasions per year; and provide expediency as applications are made to the police rather than through a court.

The aim of this section in respect of smaller pubs was to:

provide the same number of occasions for late-night opening to those provided to registered clubs.

The overall aim of this section was to:

modernise the law to allow premises to react to changing local and international consumer behaviours and expectations;

enhance the night-time economy; and

assist the hospitality industry in its recovery following the impact of the COVID-19 pandemic.

### 6 Based on the experience(s) of your organisation, do you think the policy aims of this section have been met?

*Please select only one item*

Yes

No

**Don't know X**

Provide a brief explanation for your answer below

## Sections 6 and 32 – Extension of ‘drinking-up time’

Premises which have been licensed to sell alcoholic drinks or clubs registered to supply alcoholic drinks for consumption on the premises, may also permit consumption of those drinks for an additional period of time after the hours which permit the sale or supply of alcoholic drinks has ended. This is commonly known as ‘drinking-up time’.

These sections of the Act increased ‘drinking-up time’ from 30 minutes to 60 minutes. The aim of this section was to:

- allow the gradual dispersal of customers from premises, managing the impact on neighbouring residents;
- allow customers to wait inside for taxis or lifts home; and
- provide staff more time to clear larger premises in an orderly fashion.

### 7 Based on the experience(s) of your organisation, do you think the policy aims of this section have been met?

*Please select only one item*

- Yes
- No
- Don't know X**

Provide a brief explanation for your answer below.

**Discouraging customers from drinking up quickly with a more gradual departure is in theory good. However, by extending hours it is also possible that this extra window of time is simply leading to extra alcohol being consumed and the faster drinking up is simply delayed until near closing. Overall, it is likely that alcohol consumption increases overall as a result.**

## Section 8 – Licensed race tracks: Sunday sales

This section of the Act now allows the sale of alcoholic drinks on Sundays (excluding Christmas Day) at a race track which has been licensed under the Licensing (Northern Ireland) Order 1996 to sell alcoholic drinks as a place of public entertainment and also licensed under the Betting, Gaming, Lotteries and Amusements (Northern Ireland) Order 1985. A licence granted to a place of public entertainment permits the sale of alcoholic drinks from 30 minutes before the entertainment and up to 30 minutes after, between the hours of 12:30pm and 11:00pm.

Currently, Downpatrick Racecourse is the only race track in Northern Ireland to have been granted both these licences.

Betting at race-tracks was not permitted on Sundays until the law was changed by the Betting and Gaming (NI) Order 2004. However, no corresponding change was made to liquor licensing legislation at that time, to allow alcoholic drinks to be sold on a Sunday.

The aim of this section was to:

align the Licensing (NI) Order 1996 with the Betting and Gaming (NI) Order 2004.

### 8 Based on the experience(s) of your organisation, do you think the policy aims of this section have been met?

*Please select only one item*

- Yes
- No
- Don't know X**

Provide a brief explanation for your answer below.

### Section 33 – Increase in number of authorisations for special occasions

Before the Act made changes to registration of clubs legislation, the police could already provide registered clubs with an authorisation for a special occasion permitting the supply of alcoholic drinks until 1:00am. This section of the Act increased the number of special occasions a registered club could apply to the police to open late until 1:00am, from 85 occasions per year to 104.

Safeguards were also put in place allowing complaints to be made to the court if business carried out in a club was conducted in such a manner to cause undue inconvenience to local residents, or if the hours caused undue inconvenience to residents living in the vicinity of the registered club.

If a complaint is upheld, the authorisation may be revoked, modified or terms and conditions may be added to it.

The aim of this section was to:

align late night opening in registered clubs with smaller pubs; and  
assist registered clubs' recovery following the impact of the COVID-19 pandemic.

#### 9 Based on the experience(s) of your organisation, do you think the policy aims of this section have been met?

*Please select only one item*

- Yes  
 No  
 **Don't know X**

Provide a brief explanation for your answer below.

#### Other factors

#### 10 Does your organisation think that any external factors, for example the COVID-19 pandemic and/or the cost of living crisis, have impacted any potential benefit from the changes made to the licensing and registration of clubs laws on 1 October 2021?

*Please select only one item*

- Yes  
 No  
 **Don't know X**

Provide a brief explanation of your answer below.

The benefits here sit more within the economy in terms of hospitality/ tourism and for individual freedom of choice, all of which we agree are important. However, alcohol consumption has likely overall increased in these settings as a result and the Royal College of Psychiatrists in Northern Ireland reiterate the need for public awareness around alcohol related harm and binge drinking.

Measures we are in support of to achieve this include:

- 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.

**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 450 members in Northern Ireland (including Doctors in training) who provide the backbone of the local Psychiatric service, offering acute and community 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.**

**Dated: 7th April 2025**



**Dr Julie Anderson Chair RCPsych NI & Vice President RCPsych  
- on behalf of RCPsych NI**

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