

10 January 2025

Dear Cabinet Secretary,

Visitor Accommodation (Register and Levy) Etc. (Wales) Bill

We wish to draw your attention to the provisions of the above draft Bill.

Its intention is to ask tourists to pay a small levy in order to contribute to the costs of maintaining the host community. The draft Bill already goes further than that, capturing accommodation usually made available, on a short-term basis, for business, leisure and education trips.

The purposes of the overnight stay are not defined but they appear to capture any kind of overnight stay unless specifically exempted; the draft Bill contains a list in section 9. Women and children escaping domestic violence or abuse are not included in that list. The draft Bill does envisage that women and children using such accommodation in extremis will come within the ambit of the law, albeit being able to claim an amount equivalent to the cost of the levy within 30 days of their last night's stay.

However, there are no provisions on how a refund might be reclaimed; it is left to powers for Welsh Government to introduce such provisions at some future date.

We understand the reason given for not including women and children fleeing violence in the list of exemptions in section 9 is that it would be insensitive to ask for that information to be disclosed at time of booking.

Our concern is that a woman in these circumstances is unlikely to have access to much money at short notice. It is not a welcome position that she will have to eat into what she has to pay the levy, for any children as well as herself, and then address herself to reclaiming the tax within a month of leaving. This is unrealistic and the chances of it happening at all will be low in most cases. The draft legislation, as is, displays insensitivity to the realities of a flight from abuse.

Women in this position cannot have been within the initial policy intention, which was aimed at leisure or business tourists.

In response to a question on this point put the Cabinet Secretary for Finance on 26 November 2024, he replied, “There are safeguards in the Bill so people who are placed in accommodation because of domestic abuse will not pay the levy”.

We welcome women’s refuges falling outside the definition of “visitor accommodation” and, so, the scope of the draft Bill. However, women seeking their own emergency accommodation and needing to use commercially available accommodation for a short period will have to pay the levy. As far as we can see, there is no dispensation for women “placed” in such accommodation either.

The only “safeguard” is a window of opportunity to claim back the amount equivalent to the levy, without further detail.

We would be grateful if you would speak to the Cabinet Secretary for Finance and ask him to reconsider the current lack of protection for women and girls in an emergency situation.

We are certain that a feminist government has no intention of treating women in these circumstances with anything but compassion. Unfortunately, the draft Bill does not deliver that and we urge Welsh Government to amend it appropriately.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Victoria Vasey'.

Victoria Vasey
Director, WEN Wales

cc Finance Committee