

Short-term Lets Registration White Paper

Foreword by Professor Marina Novelli (PhD), University of Brighton



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I was delighted to have been invited by Airbnb in 2020 to join a team of experts as the academic coordinator of the research, which underpins the development of their proposed registration system for short-term rentals in the UK.

The consultation process with communities across the UK allowed us to explore all the options available. In partnership with Airbnb and BritainThinks, we spoke to over 70 stakeholders from across the country including local authorities, destination marketing organisations, residents' associations, Hosts on Airbnb, trade associations, business groups, policy makers, politicians and communities' representatives.

As we look towards a post-pandemic future, it's more important than ever that we work closely with communities for the long-term sustainability of tourism. The impact of COVID-19 showed us the power of communities coming together and, in a post-COV-ID world, it is vital to ensure that tourism can help communities recover. Airbnb's report represents a true collaboration between Hosts, communities and policy makers across the UK to jointly develop proposals for a better, more harmonious relationship between tourism and communities.

Airbnb's desire to develop their relationships with local communities and work with government, policy makers, private sector operators and city leaders to develop a host registration system that is accessible and effective for all. That means creating opportunities for growth, but also playing by the rules as the most effective way forward. Now is the time to think about a better, more responsible regulatory environment for short-term lets in the UK. By addressing challenges head on, through a clear policy framework, we can ensure that the restart of tourism benefits consumers, businesses, and communities long-term.

That is why I would like to encourage the Government to support this registration system, so that local communities can continue to benefit from the tourism that the shortterm rentals' market bring to the UK, so that local people can continue benefiting from the additional income that this generates and the general public can be confident that large platforms such as Airbnb are playing their fair part in business and society.

Professor Marina Novelli (PhD)

is the Professor of Tourism and International Development and Academic Lead for the university's Responsible Futures Research and Enterprise Agenda. She coordinated the research process and collaborated with consultants BritainThinks for Airbnb's registration roadshow consultations.





Executive Summary

- 1. Short-term lets are temporary arrangements between Hosts and visitors wishing to rent on a non-permanent basis whether a single room or whole property in a given location
- 2. Short-term lets provide an opportunity for people to earn a little more money to cover their bills by renting out a room, or their home when they are out of town. They contribute to the UK economy through increased tourism and the associated benefits that brings to areas across the country, particularly in the context of the COVID-19 pandemic, which has left the travel industry on its knees.
- **3.** The growth of the short-term letting industry has brought with it a number of policy challenges. That is why Airbnb has in recent years proactively engaged with local representatives and councils across the UK to better understand how we can together maximise the benefits of short-term letting, and mitigate those challenges, in a locally appropriate way.
- **4.** Following an extensive consultation with key stakeholders across the UK, this paper is calling on the Government to bring in a clear, modern and simple nationwide registration system for short-term lets.
- 5. Local authorities, the police and fire services, as well as other regulatory bodies, already have duties and existing functions which fall into the scope of short-term lets regulation. These include a number of powers to take action against short-term lets that they have concerns about. A national registration system would serve to significantly increase transparency and oversight, giving these local stakeholders visibility on short-term lets which may be breaking applicable rules and allowing them to quickly take action which benefits the local community.
- 6. The nationwide registration system would be an industry-wide solution, allowing local authorities and other agencies to notify platforms offering services in the UK about issues with short-term lets in their area. This means that platforms can individually or as a group remove bad actors when local authorities or the emergency services identify illegal behaviour, preventing people from getting around the relevant rules by simply switching their listing to another operator.
- 7. A registration system would benefit local authorities, communities across the country and the hundreds of thousands of Hosts and millions of visitors who use platforms, including Airbnb, to book sleeping accommodation in the UK each year. It

will ensure that the UK continues to lead the way in progressive regulation and continues to be seen as a nation that values innovation and creative solutions to policy challenges.

- 8. Where the registration system provides evidence of impact on housing pressure, we recognise that there may be a desire for more control over short-term lets. Therefore, this paper also recommends that the Government should issue new planning guidance on distinguishing between commercial short-term letting activity and non-commercial/amateur short-term letting activity, on the basis of proportionality of activity.
- **9.** We recommend that this defines the specific types of shortterm letting activity, which would constitute a change of use that requires planning permission ("commercial short-term letting activity"), and what short-term letting activity does not amount to a change of use requiring planning permission ("non-commercial/amateur short-term letting activity").
- **10.** Apart from areas which have already introduced local restrictions, such as London, we believe that the standard definition of "commercial activity" should be properties occupied for short-term lets over 140 nights per year, consistent with the existing threshold for commercial activity that triggers a tax liability to pay Business Rates. We welcome further discussions with governments about how to define housing pressure.
- **11.** Creating this clarity will make it easier for local authorities to determine when planning permission is required in a particular case, and focus their enforcement efforts against unauthorised actors who are listing properties intensively on a short-term basis.

Nationwide Consultation

- **12.** After backing the Mayor of London and London Councils' call for a <u>short-term lets registration system in London</u>, and proposing <u>a registration system in Scotland</u>, Airbnb announced its intention to consult with communities <u>across the UK on proposals for a clear</u>, <u>modern and simple nationwide registration system</u> in 2019.
- **13.** The consultation was carried out by BritainThinks and the University of Brighton, which spoke to 70 stakeholders from across the country, including from local authorities, destination marketing organisations, residents' associations, Hosts on Airbnb,

14. politicians and thought leaders from all corners of the country. BritainThinks has separately published findings from our stakeholder engagement process.

The consultation, which ran throughout 2020, sought to address three main objectives:

- To find out more about local perspectives on short-term lets;
- To establish whether a registration system could help contribute to shared goals and, if so, what that system should look like;
- To understand if there is more that Airbnb and governments can do to help Hosts better understand existing rules, and introduce new tools that can improve the operating environment for all.
- **15.** It should be noted that since embarking on this consultation, COVID-19 has fundamentally changed the way people across the world live, work and travel. The tourism industry has been severely impacted, as has the worldwide community of Hosts and guests who use online travel platforms.
- 16. This unprecedented crisis sets the regulation of the short-term lets sector in a new context. With the consultation still ongoing, it was important to also consult on how short-term lets could play a role in the national economic recovery as well as the recovery of the tourism industry. Stakeholders across the UK acknowledged that short-term lets can play a role in tourism recovery and economic recovery as a whole, so future considerations about changing the way the sector operates should drive forward the sustainable regrowth of short-term lets.

The Challenge

17. The short-term letting industry needs to work for - and have a positive impact on - the communities in which Hosts live and guests are visiting. Short-term letting platforms like Airbnb should be good partners to towns and cities across the UK.

- 18. People operating short-term lets are currently required to comply with a series of regulations, which are enforced by local authorities, the emergency services and other agencies. These include requirements to obtain planning permission where the short-term letting activity amounts to a material change of use, and to comply with health and safety legislation, for example.
- **19.** However, the UK does not currently have a registration scheme for short-term lets, allowing these various authorities trans-parent oversight over lets in their area and supporting them in their performance of their existing regulatory functions. A number of local authorities and politicians have previously stated that such a system run by the Government would help them manage these functions without eroding the benefits to families and small businesses.
- **20.** The key issues raised by stakeholders during the consultation broadly fit into the three categories: community impact such as housing market impact and data transparency; how Hosts follow the rules, particularly those around taxation, how Hosts follow the rules, particularly those around taxation, health and safety standards, and planning restrictions; and concerns about guests, particularly with issues such as littering, waste and noise.
- **21.** Despite these highlighted issues, stakeholders were clear that short-term lets provide benefits to local communities and that only a small minority of bad actors have been the focus of criticism and public scrutiny, particularly when it comes to irresponsible behaviour of either Hosts or guests.

The Solution

- **22.** Airbnb is calling for the Government to create a simple-to-use, national registration system for short-term lets, which would empower local authorities and communities, Hosts and guests in equal measure.
- **23.** Under the proposed registration system, Hosts would have to obtain a registration number from the Government or de-





volved authority in order to list their property on a short-term letting platform. This would involve entering in basic personal information, declaring they are doing the activity and generating a registration number as a result.

- 24. This system, which has the support of key players in the UK short-term letting industry, would greatly increase transparency, allowing local authorities and the emergency services to quickly notify platforms if a user is not abiding by the rules and supporting them in the performance of their existing functions.
- **25.** Platforms would play a role in enforcement by taking action against listings and Hosts when local authorities or the emergency services notify them of illegal activity. This would include suspension or permanent removal of listings, if appropriate.
- **26.** Short-term lets registration systems have been adopted at a national level in Europe by countries including Portugal, Greece, France and the Netherlands, showing that these types of solutions can work for Hosts, guests, communities and governments. All these systems have free registration for Hosts.
- 27. At their simplest, registration systems provide information to authorities about how properties in their area are being used, which then allows them to achieve a number of other policy and legal objectives for example mapping tourism flows or ensuring compliance with health and safety regulations.
- **28.** The registration system being proposed in this White Paper is designed to address the key issues that were raised during the national consultation
 - Greater transparency over short-term letting activity.
 - Better management of housing supply.
 - Monitoring health and safety standards of the sector.

- **29.** This White Paper also recommends that all Hosts attest to understanding existing health and safety standards as part of the registration process. This includes requirements on health and safety certificates, insurance, gas safety and cleaning standards.
- **30.** Local authorities would be able to use information from the register to enforce against issues such as waste disposal, noise and nuisance or planning breaches including the 90-night rule in London. Throughout the consultation process, local authorities agreed that access to a register of Hosts would help them with this work.
- **31.** The aim of the registration system is to create a better regulatory environment for all giving Hosts better tools to understand their obligations, without creating a disproportionate compliance burden on local authorities. It will give local authorities across the country access to more information and data and the Government more oversight over a crucial, and growing, sector.
- **32.** The broad principles of how such a scheme could be approached by the UK Government are:

• A simple, centralised and national system.

A one-stop, online, declarative registration system, where Hosts can input their personal information and instantly obtain a registration number through an online platform. The UK has a strong track record of establishing simple online systems of this nature, most notably in voter registration.

• Mandatory for Hosts in order to capture all short-term letting activity.

It is important that all online and offline short-term letting operators support the new system, so that all Hosts comply with the rules that apply to them, whether they advertise their properties through an online platform or not.



- Provide data and transparency for local enforcement bodies. Any new system should ensure that it receives the requisite information from Hosts to support local authorities' effective performance of existing regulatory functions, including enforcement of local laws.
- Driving awareness of existing health and safety standards. Hosts will need to attest that they have understood obligations around fire safety, quality and standards as part of the process. This could be modelled around Visit Britain's "We're Good To Go" kitemark, launched in June 2020 to help businesses comply with COVID-safe practices.

• Minimal cost to Hosts.

The cost of administering this system should be accessible for all, proportionate and based on the host's level of activity. We suggest the system should be free for non-commercial Hosts and there should be a reasonable fee for commercial Hosts, set by reference to the actual cost of administration.

33. To help local authorities more effectively enforce London's 90-night rule, Airbnb and key participants in the short-term letting industry would welcome renewed discussions around industry data sharing with London Councils.

Next Steps

- **34.** Setting up a national registration scheme and achieving the policy aims set out in this document will require legislative change.
- **35.** This paper recommends that the UK Government acts under the Legislative and Regulatory Reform Act 2006 to implement this statutory system. The Legislative and Regulatory Reform Act 2006 contains a power to make any provision that would ensure that regulatory functions are exercised in a transparent, accountable, proportionate and consistently targeted way. We consider that the introduction of a registration scheme would clearly achieve these aims and that this is therefore an appropriate provision to use for the introduction of the register.
- **36.** We believe this is the right legislative approach because it simply calls for a better operating environment for small tourism businesses, without imposing additional legal obligations on them.
- **37.** This power will also allow devolved nations to introduce similar systems, which are fit for purpose for how people share their homes locally in our modern economy.
- **38.** The authors of this paper would welcome further discussions with the UK Government, the Scottish Government, the Welsh Government and the Northern Ireland Executive about how these proposals can be taken forward in partnership.

Part 1: Introduction to the short-term letting sector in the UK

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Prepared by UK Short Term Accommodation Association, a membership body for short-term lets, founded in March 2017 with a clear purpose in mind: ensuring greater cooperation to tackle common industry challenges and seizing shared opportunities in this growing sector.



1. Short-term letting is meeting the demand from consumers for a "home-from-home" experience.

Consumer tastes have changed. Now many people, whether taking a holiday or short break, prefer to stay in a fully furnished "home-from-home" - which has all the amenities they would normally have in their own homes. With more people opening up their homes for short-term stays when they are not there, a greater choice of guest accommodation is becoming available.

- The UK's sharing economy has been predicted to expand at over 30% per year over the next decade, facilitating about £140bn worth of transactions per year by 2025.¹
- According to PwC, in 2016, 76% of consumers thought that the sharing economy was better for the environment.²

2. Short-term letting provides much needed additional income for homeowners.

Hundreds of thousands of people in the UK are now able to earn extra income from their assets when they are not being used, through the sharing economy. They include empty nesters, workaways, widow(er)s, contract workers, big city dwellers, people living near to large event venues, actors and even professional sportspeople.

- Earnings from Airbnb represent an average of 20% of total income for UK Hosts.³
- More than half of Hosts on Airbnb say the additional income they earn from occasionally sharing their space helps them afford their home.⁴

3. Short-term lets can bring additional economic benefits to communities.

Properties available for short-term let are increasing the paidfor accommodation supply in many areas, meaning more visitors can stay there. For example, in Lincoln in 2019, all the hotels were fully booked for the duration of its Christmas market. Without short-term rentals, fewer people would have visited Lincoln and the positive economic benefits from increased visitor spend would not have materialised.

- A 2014 HomeAway/London School of Economics study found that the total spent per year by holiday let guests in the UK is approximately £4.35 billion, creating over 95,000 jobs across the country.⁵
- Hosts and guests on Airbnb generated an estimated £5.1 billion for the UK economy in 2019.⁶
- 4. Short-term lets play a big role in sustainable tourism and help to avoid overtourism.

By dispersing guests away from city centres, short-term lets help to prevent "over tourism" - where too many people are concentrated in one area. They also make accommodation available in areas that are not well served with hotel capacity.

- 20% of Brits wanted to book more sustainable holidays in 2019.7 $\,$
- As of January 1st 2020, there were 322,000 active listings on Airbnb across the UK.⁸
- 13 million visitors were welcomed on Airbnb in 2019 in over 2,600 towns, cities and villages across the UK.⁹

¹PwC, <u>Outlook for the Sharing Economy in the UK, (London: PwC)</u>, 2016. ²Ibid

³ Airbnb, Survey Sent to Airbnb Host and Guest Accounts Around the World (San Francisco: Airbnb), 2019.

⁴Ibid

⁸ Airbnb 2019 data



 $^{{}^{\}rm s}{\rm K}.$ Scanlon et al., <u>The economic impact of holiday rentals in the UK</u> (London: Homeaway/LSE), 2014, p.5.

⁶ Airbnb 2019 data: 2019 economic activity is the sum of Host earnings and total estimated guest spending by those who use Airbnb for accommodations. Host earnings is based on internal Airbnb data. Daily average guest spending is based on responses to the survey from Airbnb guest accounts that stayed in an accommodation in those places in 2019.

⁷ Sykes Holiday Cottages, <u>The Sykes Staycation Index 2019</u> (Chester: Sykes Holiday Cottages), p.8.

5. Short-term lets provide accommodation in a space that would otherwise be left empty.

Short-term letting is not about turning homes into hotels. Typically, properties that are let on a short-term basis are made available while their owners are away on holiday or for work, or are used during the week for work and left empty at weekends. Because these owners live in the property for some of the year, letting their property while away is a positive use of the space and does not impact on the availability of housing for long-term rental. No evidence has been published in the UK that demonstrates a concrete link between short-term letting and the UK housing supply.

- According to the 2018 English Housing Survey, 37% of homes in England are under-occupied (two bedrooms or more un-occupied).¹⁰
- According to the Scottish Government, as of December 2020, 47,333 properties in Scotland have been empty for six months or more.¹¹
- A typical listing on Airbnb in the UK is booked for 49 nights of the year.¹²
- 6. Properties advertised across multiple platforms ("cross-listing") creates the mistaken perception that there are more properties available for short-term let than there actually are. Properties can be listed multiple times on one or many platforms. Whole homes or single rooms in the same house often appear on more than one platform (such as Airbnb, Booking. com or Expedia). Online platforms are increasingly being used by commercial accommodation providers such as B&Bs and holiday lets. Further, while it may look like high volume commercial accommodation activity, many listings are managed by property management agencies on behalf of individual Hosts.

¹¹ Housing and Social Justice Directorate, <u>Housing Statistics Quarterly Update:</u> <u>December 2020</u> (Edinburgh: Housing Statistics), p.2.
¹²Airbnb 2019 data



¹⁰ Ministry for Housing, Communities & Local Government [MHCLG], <u>English</u> <u>Housing Survey Headline Report 2018-19</u> (London: MHCLG), p.23.

Part 2: The Challenge

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The regulatory landscape for short-term lets

- Short-term letting activities are already subject to regulation in the UK. Existing regulations provide clear legal standards for fire safety, gas safety, taxation and limits on activity in some areas of the country.
- 2. However, there is currently no system in the UK for monitoring the actual number or location of short-term let properties on the market. The result is that data on the sector is often of poor quality. This is in contrast to many other jurisdictions across the world, which have introduced registration systems requiring Hosts to register with the relevant authority, such as the central government or tourism body.
- **3.** The current patchwork of regulatory guidelines for short-term lets across the country is bad for UK communities, as well as Hosts and guests who use short-term lets. Divergences in enforcement between local and regional authorities are difficult for Hosts to understand and comply with, and create unnecessary bureaucracy for Hosts and enforcement authorities.
- 4. There are many regulations that Hosts must currently adhere to. People operating short-term lets are currently required to comply with a series of regulations, which are enforced by local authorities, the emergency services and other agencies. These regulations include compliance with fire, water and gas safety regulations, electrical standards, health and safety assessments, energy performance standards, planning regulations, income tax rules, Council Tax obligations, data protection and privacy regulation the Equality Act, trading regulations and TV licensing, in addition to considerations relating to insurance and mortgage policies, tenancy and leasehold agreements.
- 5. Local authorities, the police and fire services already have a number of powers to take action against short-term lets that they have concerns about. For example, while it is a host's responsibility to conduct a fire risk assessment, local fire services have regulatory powers to inspect properties that welcome paying guests, but exercising these inspection powers is extremely resource-intensive. The police and local authorities already have regulatory powers to tackle anti-social behaviour and noise orders, but do not always have information needed to identify potentially problematic actors. A national registration system would serve to significantly increase transparency and oversight for these authorities. It will give local stakeholders visibility on short-term lets in their area and help them identify those which may be breaking the rules and quickly take action, which supports them in fulfilling their function and benefits the local community.

6. At present, the UK does not have a clear, modern registration scheme for short-term lets. The regulation of short-term lets is increasingly fragmented across the UK and the devolved nations. The result is that different rules apply based on where a host's property is located in the UK. For example:

6.1 London:

Hosts in Greater London are subject to a night limit restriction and may not let their space for short-term stays more than 90 nights in a calendar year without planning permission from their local authority.

6.2 Northern Ireland:

Hosts in Northern Ireland must register with the local tourism authority. This is a law that predates the existence of home-sharing platforms or the widespread use of the internet, as it was passed in 1992.

6.3 Scotland:

The Scottish Government has proposed licensing and planning requirements for short-term lets that will be devolved to each of the 32 local authorities across the country.

- 7. This fragmentation has led a number of local authorities and politicians to previously state that such a system - run by the Government - would help them manage short-term letting activity, without eroding the benefits to the families and small businesses who host or welcome guests into their communities.
- 8. After backing the Mayor of London and London Councils' call for a <u>short-term lets registration system in London</u>, and proposing <u>a registration system in Scotland</u>, Airbnb announced its intention to consult with communities <u>across the UK on proposals for a clear, modern and simple nationwide registration system in 2019.</u>
- **9.** As such, we would welcome discussions with the Northern Ireland Executive, the Scottish Government, the Welsh Government and the UK Government to explore the best way forward.

Key stakeholder issues

10. The consultation was carried out by BritainThinks and the University of Brighton, who spoke to 70 stakeholders from across the country, including from local authorities, destination marketing organisations, residents' associations, Hosts on Airbnb, trade associations, business groups, policymakers, politicians and thought leaders from all corners of the country.



11. Key issues raised about short-term lets during the nationwide consultation broadly fit into three categories:

11.1 Community impact:

Housing market impact and data transparency. Stakeholders had concerns that the growth of short-term lets is resulting in community erosion. They also called for more visibility and transparency to better understand the impact that short-term lets have on local housing markets.

11.2 Hosts:

How operators follow the rules, particularly around taxation, health and safety standards and planning restrictions. Whilst short-term letting operations are already subject to regulation in the UK¹³ - existing building, planning and tourism regulations provide clear legal standards for fire safety, gas safety and taxation - stakeholders raised questions about how these standards are being adhered to and enforced.

11.3 Guests:

Tackling amenities issues such as littering, waste and noise. Stakeholders expressed a strong desire for visibility and transparency in order to identify and take actions against problematic Hosts, where there are repeated issues around noise, nuisance or residential amenity. Local authorities want to know who is doing the activity, as well as the scale of the impact.

12. In summary, stakeholders had concerns that the growth of short-term lets is resulting in community erosion, and said that the Government should intervene to solve these challenges.

"It's important to strike a balance between offering someone to come and live in the community... [and the] impact on the community losing its soul from people not living there permanently."

(Wales)

- **13.** Concerns about "irresponsible" behaviour centred around new, unauthorised actors who are listing properties intensively on a short-term basis, rather than people who short-term let in their primary residence. Stakeholders generally supported people sharing their homes responsibly. However, there were concerns about the perceived impact of certain short-term lets on local communities. Without sufficient oversight or control from local areas which have housing or (historic) overtour-ism issues, there were concerns about how short-term lets could change the long-term makeup of communities.
- 14. Stakeholders called for greater regulatory effectiveness in a number of different policy areas. In particular, respondents from councils in London raised concerns about how the 90-night rule can be enforced effectively. Although voluntary measures introduced by Airbnb to limit Host activity on its platform were welcomed, this does not solve the issue of Hosts who are able to circumvent the 90-night rule by simply relisting their property on other platforms which have not put such systems in place.

"I think the key to success is a system which enforces the 90-night rule. I can absolutely see the logic of that."

(London)

15. In addition, a variety of stakeholder groups have called for a "level playing field" for all tourism accommodation, ensuring that existing frameworks around taxation and safety are adhered to across the board.

'There's a lack of understanding around health and safety and ignorance is no excuse, so people are being prosecuted under regulations they weren't aware of."

(South-West)

¹³ The short-term rental industry is regulated, Short Term Accommodation Association



16. Communities wanted more visibility and transparency over what is happening in their area - both to better understand the impact that short-term lets may have on local housing markets, but also to identify and take actions against Hosts, where there are repeated issues around noise, nuisance or residential amenity. Local authorities want to know who is doing the activity, as well as the scale of the impact.

"Greater visibility is important because the local fire service in Bath was not aware even of large shortterm lets being used."

(South-West)

17. However, on balance, stakeholders acknowledged that short-term lets provide benefits to local communities across the country. Stakeholders were clear that the short-term letting sector is an economic driver for the regeneration of otherwise overlooked areas within communities. Stakeholders - in most locations - noted that the proliferation in short-term lets had contributed to an increase in tourist flow, and a subsequent increase in money spent in local shops, restaurants and on cultural experiences. Stakeholders highlighted the increased importance of this economic boost in the context of tourism sector recovery post-lockdown.

"It's spreading the geography of where people spend their money because hotels tend to be in central locations where spending can become concentrated... short-term lets spread spend across areas that may not have had any tourism before."

(Wales)

"It has huge economic benefits for areas Hosts are in...Hosts are often recommending and highlighting local businesses within the community that might not have otherwise had the income."

(Wales)

- 18. Stakeholders made clear that short-term lets provide accommodation flexibility for tourists and visitors, encouraging greater and more diverse types of tourism in the UK. Short-term lets were also seen to offer a greater supply of cheaper accommodation on a short-term basis than traditional hospitality, which is beneficial for tourists with lower budgets.
 - "I think this type of letting opens up to families who cannot afford hotels but do not want caravan/ camping holidays and offers a wide range of basic to luxury options."

(South of England)

"It is great that Bristol is able to offer a variety of places, not just hotels; it can offer a wider selection which ultimately will bring more people to Bristol."

(West of England)

19. Respondents also spoke about the importance of the extra income earned from short-term letting for many individuals and families around the UK. Hosts who responded to the consultation also pointed to the social and emotional benefits they had experienced from letting out a space and meeting new people.

"For Hosts with family responsibilities it's a great way to earn extra income and you get to meet amazing people doing brilliant things."

(Host, Wales)

"My experience has been very positive...with people coming to stay, it works really well. People are polite and it's given me a lot of faith in human nature."

(Host, South of England)

The impact of COVID-19 on the industry

- **20.** The COVID-19 crisis has had a devastating impact on the tourism industry, with international travel having ground to a halt as a result of the pandemic.
- **21.** Since embarking on this consultation, COVID-19 has fundamentally changed the way people across the world live, work and travel. The tourism industry has been severely impacted, as has the worldwide community of Hosts and guests who use online travel platforms.
- 22. With restrictions on international travel, people around the UK are opting for holidays closer to home, often staying in small towns, or in rural or coastal communities. However, domestic travel has likewise been greatly reduced, with the majority of the country facing restrictions as a result of the pandemic for most of the past year. Travel within the UK has been further reduced by the restrictions placed on the hospitality sector, with restaurants, tourist sites and entertainment venues either closed or operating in a constrained way.
- 23. This unprecedented crisis sets the regulation of the short-term lets sector in a new context. With the consultation still ongoing, it was important to also consult on how short-term lets can play a role in the national economic recovery as well as the recovery of the tourism industry. Stakeholders across the UK acknowledged that short-term lets can play a role in tourism recovery and economic recovery as a whole, so future considerations about changing the way the sector operates should drive forward the sustainable regrowth of short-term lets.

- 24. The short-term letting industry has likewise been badly affected by the pandemic, with a series of national and local lockdowns taking place throughout 2020 bringing the sector's operations to a near halt. Outside of those lockdowns, there are still far fewer people travelling, and many Hosts who rely on income from short-term lets have seen their earnings decimated.
- 25. Respondents to the consultation made clear that short-term lets will be a key part of the tourism industry's recovery from the COVID-19 pandemic. Stakeholders noted that as restrictions ease and life begins to return to a sense of normality, there is likely to be increasing consumer demand for private, domestic spaces, particularly for holidays across the UK. Stakeholders also said that they believe that it will be easier to abide by COVID-secure guidelines and keep consumers protected from the virus in short-term let properties compared to traditional hospitality settings and, therefore, said that they see the short-term letting sector as driving the first phase of recovery in domestic tourism.



"We might see a big increase in the amount of people letting out rooms and properties as a means of generating extra cash during the recession, on an amateur basis - which is how Airbnb initially got off the ground."

(National stakeholder)

26. Respondents also highlighted that the extra income people are able to generate from letting out their property will be crucial to people across the country in the wake of the pandemic and the economic hardship it has caused.

Part 3: The Solution

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A clear, modern, easy-to-use national registration system

- This paper proposes a simple, easy-to-deliver national registration system that would empower Hosts, give guests certainty and confidence and, crucially, allow local authorities to access data that is hugely valuable in supporting them with the fulfilment of their existing functions. This new industry-wide registration system would support ordinary people sharing their homes on an occasional basis as well as commercial operators.
- 2. Under this registration system, Hosts, or agents acting on behalf of Hosts (property managers), will have to obtain a registration number from the Government to offer a property for short-term let, whether through a platform or otherwise. This will involve entering in basic personal information, declaring they are doing the activity and generating a registration number as a result. Hosts would also attest to understanding existing health and safety standards as part of the registration process.
- **3.** As well as providing increased transparency to Hosts, guests, local authorities and central Government, this system would:
 - **3.1** Give local authorities more data and visibility over Hosts listing properties on an ongoing short-term basis, suggesting they may need planning permission for their activities.
 - **3.2** Create a better regulatory environment for short-term lets to operate, helping to make the enforcement of health and safety regulations more consistent across the country.
 - **3.3** Give relevant authorities more visibility over short-term let properties hosted by problematic commercial operators, who are the primary subject of public and political criticism and put a strain on local authority resources.
 - **34.** Enable all platforms to take coordinated action against unwelcome operators, by establishing notice and action protocols.
 - **3.5** Ensure that all Hosts understand their obligations around health and safety, raising standards nationwide by including an attestation step in the registration process.
 - **3.6** Support local authorities in their function of assessing whether there has been a material change of use¹⁴, and refining the framework within which decisions are made.

4. The key principles for the registration system to operate effectively and provide maximum benefit to local authorities, Government, Hosts, and guests would include:

4.1 Online one-stop-shop:

Hosts should be able to complete their notification in a single visit to the GOV.UK website, leveraging existing identity validation infrastructures in order to approve entries in real time and allowing Hosts to receive their registration number automatically after completing the registration process.

4.2 Instantaneous and one-time-only:

There should be no delay in issuing a registration number. If further validation is required, a host should be able to welcome their first guests without waiting for follow-up. Hosts should not need to repeat or renew their notification, except in the case of material changes of circumstance. There should be a mechanism in place that removes registrants from the register if they have not been active for an extended period of time, to avoid artificial inflation of the number of short-term let properties over time.

4.3 Affordable for Hosts:

Non-commercial Hosts should be able to register cost-free. A nominal fee for commercial Hosts will cover the actual administration costs of the regime. A definition of "commercial Hosts"¹⁵ would need to be established - something the authors of this paper would be happy to discuss further with the Government and other interested parties. We are also open to discussing whether the registration system could also apply to other types of short-term accommodation. Structures should be proportionate, taking into account the host's level of activity. Sliding scales of fees for the maintenance of a register are common in the UK. Due to the diverse range of relevant actors in the short-term let industry, we believe these sliding fee scales would be an appropriate benchmark for the registration system being proposed in this paper:

- In Northern Ireland, £20 is payable for every room you intend to let, subject to a minimum fee of £80 and maximum of £200.¹⁶
- The Information Commissioner's Office (ICO) charges small businesses £40 per year to maintain their data protection registration, while charging higher fees to larger organisations.

¹⁴ A material change in the use of any buildings or other land for the purposes of ss. 55(1) and 57(1) of the Town and Country Planning Act 1990.

⁶⁵As per point 10 in the Executive Summary, we believe that the standard definition of "commercial activity" should be properties occupied for short-term lets over 140 nights per year, consistent with the existing threshold for commercial activity that triggers a tax liability to pay Business Rates. We are also open to discussing with Government and interested parties whether the proposed registration system could also apply to other types of short-term accommodation, such as hotels.

¹⁵ Tourism Northern Ireland, <u>Basic Guide to Starting a Guest House Business</u> (Belfast: Tourism Northern Ireland), 1992, p.3.

4.4 Accessible for local authorities and emergency services: A nationally run scheme should be able to be accessed by local authorities and local services. Since a host's registration information is collected for the purposes of enforcement, there is no justification from a privacy perspective for publishing a public database of registered Hosts or listings. Data protection laws, in particular those governing limitations on the purposes of processing, must be strictly complied with.

4.5 Data minimisation:

Consistent with data protection best practices, Hosts should only be required to provide the minimum data necessary to process their registration. There should be no requirement to upload supporting documents, but Hosts should be required to attest to understanding applicable health and safety regulations.

4.6 Consistent application and level playing field:

Registration and enforcement obligations should apply to Hosts whether they are offering their property for shortterm let through online or offline means and across all types of online distribution channels (including platforms).

4.7 Effectively enforced:

Transparency introduced by registration will enable more effective enforcement of individual breaches. Further, it would make it possible to track repeat breaches for which stricter penalties - such as being suspended or struck from the register - may be appropriate. In addition, this should be enforced by platforms and other types of operators through established effective notice and action protocols.

4.8 In partnership with platforms:

To this end, the Government should work with platforms to formulate detailed and consistent processes, whereby listings of concern can be flagged to platforms for appropriate action. For listings being operated illegally, the process should be consistent with existing processes for other kinds of illegal online content and should be established in accordance with the planned legislation set out in the Online Safety Bill. This process would introduce much-needed structure into current notice and action systems. It would also highlight the benefits of using standard language in such communications and the importance of providing the right level of information to enable platforms to take action.

4.9 Reasonable implementation period:

In introducing a new system, Hosts should be given a reasonable period to register before enforcement against unregistered listings commences. To encourage the highest levels of adoption, the Government should partner with industry to communicate jointly about the new process.

How the system could be implemented in the UK

- 5. This proposal should be modelled on those already enacted by governments and cities across the world, which have adopted simple digital registration systems that are fit-for-purpose for the digital economy and have effectively and sustainably boosted the short-term letting sector.
- 6. Simple and well considered registration systems help to introduce transparency into the short-term lets sector and related obligations, and help to increase compliance by making it easier for Hosts and guests to follow the rules. They can also provide cities with important information regarding their communities.
- 7. Examples of countries and cities implementing registration schemes include Portugal, the Netherlands and Hamburg. We have set out how these systems work in practice in an Appendix to this proposal, to better inform best practice across Europe.
- 8. We recognise that achieving this will require legislative change. A national registration system for the UK can be enacted through secondary legislation under the Legislative and Reform Act (2006) ("the 2006 Act").



- **9.** The Legislative and Regulatory Reform Act 2006 contains a power to make any provision that would ensure that regulatory functions are exercised in a transparent, accountable, proportionate and consistently targeted way.
- 10. We consider that the introduction of a registration scheme would clearly achieve these aims and that this is, therefore, an appropriate provision to use for the introduction of the register.
- **11.** In particular, the registration scheme would allow local fire services and health and safety regulators to fulfil their existing functions better.
- **12.** Also, it would allow local planning authorities to be more targeted in assessing whether there has been a material change in the use of any properties in their remit:

12.1 Targeted:

Local authorities would be able to target their enforcement activities to properties that are registered.

12.2 Transparent:

Local authorities can be transparent and open about the reasons why enforcement action has been focussed and targeted on particular areas or properties.

12.3 Accountable:

The register could be used to hold local authorities accountable for the decisions to enforce, but also not to enforce, the material change of use in the planning permission requirement - local authorities could not argue that they were unaware of the use of a property for short-term letting.

12.4 Proportionate:

A simple registration scheme would be the most proportionate mechanism for achieving the desired outcomes, as it does not require significant investment to implement and would not place an undue administrative burden on Hosts. The registration requirements, such as the fee, can be proportionately adjusted for commercial Hosts.

12.5 Consistent:

The registration scheme could encourage consistency in the application of the "material change of use" test, albeit that local authorities would still be able to take local factors into account.

- **13.** We would welcome further discussions with local planning authorities as well as the Health and Safety Executive to carry this work forward.
- 14. It is important to distinguish between a registration system and a licensing system. Registration systems involve an instant and permissive system whereby Hosts who provide the requisite information will be registered in the system. Licencing systems require Hosts to secure prior authorisation in order to be permitted to operate, often needing to meet a more arduous set of criteria. Given our experience engaging with governments on both registration and licensing systems across Europe, licensing systems often place a disproportionate burden on both regulators and licensees, when a registration system can achieve a similar outcome. More specifically, licensing sys-

tems have traditionally been expensive to build and operate, and slow to move from pen and paper to the online world. For example, physical visits and document validation can slow down the licensing process, even when Hosts are following local requirements. Bearing this in mind, we are advocating for a smart, digital solution that ensures everyone continues to benefit from tourism in a sustainable and responsible manner.

15. The technological complexity of implementing this proposal should give rise to open communication across the industry, to share ideas and agree common technical approaches. As such, this paper recommends that the Government establish a working group of UK online and offline distribution channels for short-term lets, relevant trade bodies, such as the UK Short Term Accommodation Association (STAA) and short-term let providers across the country to establish a way the industry can take this work forward together.



The challenges a national registration system will address and stakeholder feedback on the proposal

16. The below section sets out the ways in which a national registration system would address the key challenges set out by stakeholders following the national consultation.

The need for greater data and transparency

- **17.** A registration scheme will give governments and local authorities oversight of who is conducting short-term let activity and how many such people are active in their local area.
- 18. The majority of stakeholders who took part in the national consultation agreed that a national registration system would be a positive step forward, offering increased data and visibility of the short-term letting sector. Respondents said that the registration scheme could improve the reputation of the short-term letting sector by increasing transparency, with some stating that the data could be used to quantifiably demonstrate the positive impact that short-term lets are having in their local area.
- **19.** In order to facilitate the transparency introduced by a national registration scheme, the short-term lets sector should continue to share aggregated data publicly with governments and local leaders.



"It would give a better idea of the size of the market and who is participating in it. Local authorities often don't have that overview and need it for a more rational discussion and being able to demonstrate quantifiably the contribution it can make to the economy, supporting jobs and shifting the conversation."

(National stakeholder)

Ensuring that Hosts meet existing health and safety standards

- **20.** Under the registration system, Hosts will attest to understanding applicable mandatory health and safety obligations.
- **21.** Respondents to the consultation were clear that a registration system would provide Hosts with greater assurance around health and safety standards. This was seen to be particularly important in the aftermath of COVID-19, given the increased demand for 'staycations' stakeholders are observing with the continued difficulties of international travel.

'There are now more [Hosts] wanting that independent accreditation to reflect increasing consumer demands around standards...there's the ability for platforms to show registration and advice [around COVID-19] to Hosts in one place."

(National stakeholder)

22. In addition to the registration scheme, platforms, intermediaries and online travel agencies which are active in the short-term lets sector should help Hosts in meeting existing health and safety standards by supporting them through proactive education programmes and supporting independent accreditation schemes.

Increased community disturbance and residential amenity issues (including noise, nuisance and waste)

- **23.** A national registration system will allow improved reporting and enforcement, providing a clear way for local authorities and platforms to identify and enforce against problematic listings.
- 24. Stakeholders said that a registration scheme would help them to more easily identify those properties, which they have received complaints about, allowing for greater monitoring of cases where anti-social behaviour takes place in short-term let properties, and therefore, more effective targeting and use of resources. Respondents also said that greater visibility of where short-term providers are operating in their area, and the increased visibility for officials in relation to those properties, could help give peace of mind to local communities that local properties are being let out both safely and legally.

25. Although stakeholders indicated they believed that a majority of short-term let Hosts operate properly, they acknowledged that there were still a minority of trouble-makers. Where enforcement efforts are necessary, they said that better data may help readily identify these problematic Hosts. They also felt that another benefit of the transparency brought by such a registration system would be an improved understanding of how short-term lets operate in their area and the potential to improve enforcement action and administer penalties for bad practice.

"Having a registration scheme where it is easy to track where properties are and who owns them would make enforcement more effective"

(South of England)

"Hosts have to be made accountable for what happens at their properties, quickly and transparently."

(South of England)

A registration scheme could also allow local authorities to effectively focus their enforcement efforts."

(West of England)

- **26.** Stakeholders recognised the benefits a registration scheme would bring to issues around anti-social behaviour, for example by giving them greater insight into which properties that receive complaints are participating in short-term letting, and streamlining the process of identifying those Hosts they need to contact. While many said that it may not entirely solve the issue, stakeholders were clear that it would be an important first step towards addressing the issue and welcomed it overall.
- **27.** In addition to the registration scheme, platforms in the shortterm lets sector should help to ensure Hosts do not engage in anti-social behaviour. This could be achieved by investing in host education programmes that promote responsible travel, as well as setting clear codes of conduct for their guests.

Housing pressure

- **28.** The data generated as part of a national registration scheme will help give local authorities a greater understanding of the precise impact of short-term lets on their area.
- 29. Stakeholders who took part in the consultation made clear that the current lack of data particularly as regards the proportion of properties being let out on a commercial basis is a source of tension and disagreement. Stakeholders were concerned about the impact on local housing markets of commercial agencies letting out whole properties as short-term lets, over a length of time. They agreed that better quality data would lead

to more constructive debates and informed decision-making on which policy solutions might be best employed to ensure local housing supplies.

"If you have regulation you can keep an eye on the data of how many short-term lets there are, rather than scraping the internet to try and find out - it could give a clearer picture."

(South-West)

30. In addition to the registration scheme and the additional transparency it would bring in this regard, a further recommendation is that the UK Government - in partnership with intermediaries in the short-term lets sector - provide further national guidance on what constitutes commercial activity. This would give local authorities more clarity on how to regulate commercial activity in a consistent manner.

London's 90-night rule

- **31.** A national registration scheme would require Hosts to input information, giving local authorities the information they need to monitor compliance.
- 32. In 2015, a law was introduced that allowed properties in Greater London to be used for short-term lets up to a total of 90 nights per calendar year without planning permission ("90-night rule"). However, the law has proved to be extremely difficult for councils to enforce. Even with the action taken by Airbnb, Expedia/ VRBO and TripAdvisor to introduce nightly limits, local authorities have requested increased transparency to assist them with their enforcement requirements. In 2019, the Mayor of London, Airbnb and London Councils called for a registration system to ensure that the 90-night rule can be effectively enforced.
- **33.** London-based stakeholders who took part in the consultation said that they recognised the potential of the registration scheme to enable better enforcement of existing legislation, such as the 90-night rule in London.

"We'd all appreciate more data, to assess whether people are actually breaking the law and we can target those who are going over 90 nights."

(London)

- **34.** As such, we believe that any registration system should be underpinned by data sharing, to give local authorities an effective way of enforcing the 90-night rule and ensure that people are unable to get around the rules by simply moving their listing to another platform.
- **35.** To help local authorities more effectively enforce London's 90-night rule, Airbnb and key participants in the short-term letting industry would welcome renewed discussions around industry data sharing with London Councils. Through this re-

newed discussion, we hope to ensure that local authorities are able to enforce laws such as London's 90-night rule at scale, preventing people from being able to exceed the night limit by cross-listing on other platforms or hosting offline.

Additional recommendations on Government policies to support the sector

36. While the registration system will go a long way to satisfying the key challenges identified by the consultation, better guidance and further Government reform can play an important role in ensuring that all communities continue to benefit from home sharing. As set out above, stakeholders across the country also acknowledged the importance of proactive interventions in solving issues around housing pressure on local communities. Therefore, this paper recommends that the UK Government considers the following two policies, which would provide wider support to the sector beyond a national registration scheme.

Additional recommendation one

- **37.** Where the registration system provides evidence of impact on housing pressure, we recognise that communities may want more control. The majority of housing policy challenges raised during the consultation were centred around increased commercial activity.
- **38.** Therefore, this paper supports a distinction being clearly defined in national planning guidance between commercial and non-commercial short-term letting activity being clearly defined by national planning guidance, with planning requirements only applying to commercial short-term lets.
- **39.** In instances where entries in the registration system clearly support broader evidence of acute housing pressure, local authorities should be empowered to enforce this definition and, potentially, to introduce additional planning controls. We welcome further discussions with governments about how to define acute housing pressure that would necessitate the introduction of additional planning controls. However, for long-standing businesses without a history of community disturbances, we believe that there should be a provision to allow commercial activity to continue.
- **40.** Apart from areas which have already introduced local restrictions, such as London, we believe that the standard definition of "commercial activity" should be short-term lets occupied for over 140 nights per year, consistent with the existing threshold for commercial activity that triggers a tax liability to pay Business Rates.
- **41.** Setting clear boundaries between non-commercial and commercial providers of short-term lets will facilitate enforcement by local authorities against unauthorised actors which are listing properties on an ongoing short-term basis. Putting this power back in the hands of local authorities will improve transparency and consistency on when they can grant planning permission, and when they should restrict the activity.



- **42.** This will ensure that local authorities have thoroughly substantiated that introducing additional restrictions is both necessary and proportionate based on the specific circumstances in their area. The power to introduce additional restrictions would only be available to local authorities if a registration system has been implemented.
- **43.** Many local communities want to welcome more tourism, and do not have the same concerns about housing issues as major cities or tourism hotspots. Creating the flexibility to only introduce more stringent measures where acute housing pressure is evident will give those communities the ability to control the activity, while allowing communities that want more tourism to be able to attract new Hosts and welcome guests.

Additional recommendation two

- **44.** The Government should unlock historic barriers to people hosting in their homes by reforming leasehold agreements, tenancy agreements and mortgage terms.
 - 44.1 Many potential Hosts who wish to share their primary residence are prevented from doing so by outdated agreements with freeholders, landlords and mortgage lenders. There is a strong case for reform in these areas, so that ordinary people who want to share their home have the freedom to do so and can benefit from the additional income that short-term lets can provide.
 - **44.2** The authors of this paper would welcome further discussion with the Government and other interested parties on how to take forward this recommendation.

Part 4: Conclusion and Next Steps



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A clear, modern, easy-to-use national registration system

- This White Paper is recommending an ambitious national registration system for short-term lets which would establish a proportionate and fair framework for the industry, protect and give certainty to a growing sector which is reeling following the pandemic and provide greater transparency to communities across the country.
- 2. A registration scheme would support Hosts who let their rooms on a short-term basis to put a little more cash in their pockets, boost the tourism revenue their guests bring to their areas, and, crucially, help give local governments the data they need to better understand how short-term lets impact local communities.
- **3.** In addition to the legislative solution needed to take this forward, this White Paper recommends that the Government establish a working group of UK online and offline distribution channels for short-term lets and short-term let providers across the country to establish a way the industry can take this proposal forward alongside the Government.
- 4. As well as a clear, modern and simple nationwide registration system, this White Paper also recommends that Government considers issuing new guidance for Hosts and local authorities on what types of short-term letting activity constitute a change of use that requires planning permission ("commercial short-term letting activity") and what short-term letting activity does not amount to a change of use requiring planning permission. It also proposes that the Government should unlock historic barriers to people hosting in their homes by reforming leasehold agreements, tenancy agreements and mortgage terms.
- 5. In the wake of the COVID-19 pandemic, the short-term letting sector will be increasingly important to the UK's tourism industry and wider economy. The proposals outlined in this White Paper will ensure that the UK is at the forefront of progressive regulation in this area, and that it is committed to the long-term growth and success of the short-term letting sector and the tourism industry more widely.
- **6.** The authors of this White Paper would welcome the opportunity to engage further with the Government on the policies proposed in this document.

Appendix - examples of registration systems across Europe

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Below are examples of how registration has been implemented in countries and cities across Europe. We have outlined both the regulatory framework, and the registration process, both of which are key components for implementing a successful registration system.

France (Responsible Hosting Page)

1.1 Regulatory framework:

In France, Hosts are subject to registration requirements and nightly limits, depending on where or how they host. All Hosts across the country can share their primary residence for up to 120 nights of the year, no matter where they live. Secondary residences have different restrictions. In small cities, sharing your secondary residence, year round, is permitted by default. However, in medium to large cities with housing constraints, cities may vote on introducing a "change of use" provision, where planning permission is required to operate second homes. Over 50 cities, including Paris, Bordeaux, Nice and Lyon have introduced registration systems and change of use provisions for short-term tourist accommodation, and platforms are required to share data on an annual basis with the cities, which provides greater transparency of Hosts' activities in their local area.

1.2 Registration process:

The registration process is free, online and only takes a few minutes to complete. Hosts obtain a registration number automatically from their city hall's website and include it on their listing. No documents need to be uploaded. Registration is a way to obtain a number which gives more transparency to public authorities on the short-term let activities in their area and, in conjunction with data sharing, also supports enforcement.

2. Portugal (FAQs available here)

2.1 Regulatory framework:

In Portugal, registration works at the national level. The law clearly specifies which types of tourist accommodation need to register, and which do not. The registration scheme is nationally consistent, with municipalities able to further establish regulations and restrictions based on their local competencies. Municipalities such as Lisbon have since introduced further local regulations in which a quota system is applied which limits the granting of new registrations of short-term lets in certain areas of the city.

2.2 Registration process:

Registration is easy, online and affordable. All new users must register online and receive a number that they must put in online or offline advertisements. It is mandatory on Airbnb for new Hosts to input a registration number in their listing or attest that they are exempt from the obligation to get a registration number.

3. Germany - Berlin (<u>Responsible Hosting</u> <u>page; City FAQ</u>) **and Hamburg** (<u>Responsible</u> <u>Hosting page; City FAQ</u>)

3.1 Regulatory framework:

Every host who lets out residential space in Hamburg needs to register with the city prior to sharing a primary home (whether a room or an entire apartment), and must display the registration number provided by the city in their listing. Hosts that do not fall under the law (for instance if they rent commercial space) either need to notify the city and display a registration number, or - if applicable - display their company details in an approved format. Hosts need to report every booking within 10 days after guests arrive, otherwise their registration number is invalidated and they are subject to fines of up to EUR 500,000. Hamburg's regulations also include monitoring obligations for platforms that contravene EU law.

3.2 Licensing process:

Currently the licensing process in Berlin is very onerous for Hosts, especially when compared to the digital registration scheme implemented in Hamburg. In Berlin, the process is entirely offline; Hosts are required to pay an application fee and provide a series of documents, some of which are particularly difficult to obtain. The decision from the authorities on whether a host is granted a registration number can be arbitrary and artificially delays the process.

4. Spain - Andalusia (FAQs available here)

4.1 Regulatory framework:

There is no national registration system in Spain. As Autonomous Communities have jurisdiction over tourism there are 17 different regional regulatory systems, with 17 different registries. Of these, the registration scheme for the region of Andalusia is the best model. Both commercial Hosts and non-commercial Hosts must go through the registration process and are subject to the same rules.

4.2 Registration process:

The Andalusian scheme is simple, online and instant. Every host can register a range of properties, from rooms to entire homes as primary or secondary residences.

5. The Netherlands

(Responsible Hosting Page, Ministerial landing page on registration)

5.1 Regulatory framework:

New national rules that came into effect in January 2021 give cities in the Netherlands a range of policy instruments to apply based on a tiered approach. Cities presenting robust evidence of housing scarcity and/or livability issues are able to opt into this new regulatory framework. Cities can introduce increasingly stringent measures, beginning with registration, followed nightly limits and, finally, a licensing requirement. The introduction of each, more far-reaching, step is only possible if the previous step has been taken and cities have thoroughly substantiated that taking the next, more stringent, step is both necessary and proportionate.

5.2 Registration process:

registration is instantaneous, free, online and one-time only. Hosts in Amsterdam have to apply for a permit every year, which costs about EUR 45 per year. There is diversification when it comes to registration - not all listings (e.g. commercial Hosts, B&Bs) are required to get a registration number or (the same) permit.

6. Greece

(Responsible Hosting page & PWC guide)

6.1 Regulatory framework:

Greece's national rules sets out a clear definition between professional tourism accommodation and home sharing. Professionals in Greece are licensed under a long-standing piece of legislation. Homesharers must register online, and receive their registration numbers instantly, which should be displayed in all public listings of the property. There are no limits on how many nights a homesharer can host, but the host is obligated to report on all bookings and earnings - including guest information - on a monthly basis.

6.2 The registration system in Greece is run by the national tax authority, allowing the reporting system to be integrated into tax reporting. All Greek citizens have an access code and they can register to share their home using easily accessible property and personal information. The system provides a registration number immediately. Thereafter, a host will have to report by the end of each calendar month on all stays that took place in the previous calendar month (i.e. reporting end of February on stays that happened in January). Tax is declared and paid through the standard and pre-existing annual tax declaration.

6.3 Host costs:

Registration is free, requires no paperwork and is very quick.

