

Ms P. Schofield,
Senior Coroner,
West Sussex,
Coroner's Office,
Orchard Street,
Chichester,
West Sussex PO19 1DD.

15 September 2016

Dear Ms Schofield

Thank you for your letter in regard to the sad death of Alfie Gray. We write in response to your letter and Regulations 28 and 29 of the Coroners Regulations 2013. We have been carefully reviewing the report and your requests for action.

I thought it would be helpful to firstly outline the purpose and role of ABTA. We are a trade association representing and providing services to our Members who make up a significant part of the UK travel industry and who sell a range of travel services including package holidays, flights, accommodation and car hire. ABTA provides services to consumers through its consumer affairs and arbitration services which deal with a range of consumer issues involving ABTA members.

ABTA also fulfils a regulatory role in respect of its members through its Code of Conduct and financial protection function. In regard to health and safety, ABTA provides guidance to Members and raises awareness on key safety issues with consumers and destination authorities. I should highlight that Global Travel Group are not an ABTA Member therefore would not generally have access to the advice and guidance we provide to Members on health and safety.

In regard to our Members, we believe they view their customers' welfare as a priority in their assessments and programmes. However each ABTA member will contract properties very differently, from solus use of the entire property to ad-hoc allocations of rooms per year. Members make their own decisions about their programmes including the choice of properties and whether and how they decide to audit these properties from a health and safety or sustainability perspective based on their contractual arrangements with the property.

In the absence of European-wide standards or a directive on tourism accommodation safety UK tour operators came together, originally as the Federation of Tour Operators (FTO), to develop the Tourism Accommodation Health and Safety Technical Guide best practice guidelines (the Technical Guide). The first edition of the Technical Guide was developed in 2000/1 and the current edition (3) in 2012 as ABTA/FTO. The guidance enables tour operators to have a common approach to suppliers on a non-competitive issue such as safety. The guidance covers key health, safety and security issues for accommodation suppliers. Each chapter has been consulted on and developed with experts in their field. The Technical Guide is reviewed every few years, and it is currently being reviewed by Consultants who are experts on the different safety aspects, the guidance is updated to reflect any new evidence based safety changes.

I address your request in Section 5 in regard to the matters of concern. You draw attention to the provision of lifeguards, medical training and communications.

The presence of lifeguards at swimming pools is not a legal requirement in many overseas countries, nor is it in the UK. The current Technical Guide section on Pool Safety and Waterparks addresses the subject of lifeguards. In the Customer Information section there are clear recommendations on the need to inform customers as to whether there is a lifeguard present or not.

We believe this advice is important for any property that has swimming pools as research shows that British nationals of all ages have experienced difficulties when swimming in the UK and overseas. In the absence of international standards on the requirement for lifeguards we believe that the Technical Guide does reflect current best practice and helps to create a common approach.

In addition to the Technical Guide we also have an ongoing campaign with the Royal Life Saving Society and the Foreign and Commonwealth Office to raise awareness about the potential risks of swimming on holiday and to raise awareness about building up swimming ability prior to a holiday. I attach a copy of the posters and key messages.

The Technical Guide section on Pool Safety addresses emergency procedures from management responsibility to appropriate staff training. The Management Responsibility section addresses the need to train staff in lifesaving techniques, CPR and first aid. We believe that this reflects current best practice and we continue to promote this approach for Members to their suppliers.

We have drawn your Matters of Concern to the attention of the Consultants currently reviewing the relevant sections of the Technical Guide. We do know that there has already been discussion about and a review of the information on emergency procedures and the signage at swimming pools. Any new guidance on these matters will be built in to the next edition of the Technical Guide.

I would also highlight that ABTA and our members have been calling for a European Tourism Accommodation Safety Directive to create a common framework for all travel across Europe. Whilst this would not cover global safety standards we have seen that where European Standards are developed these can get adopted in other key tourism destinations. I include a summary of our Tourism Accommodation Safety campaign activity. This is a core part of our policy agenda and we continue to lobby for change.

ABTA is not aware of the full facts in the specific case which is the subject of your report and therefore is unable to comment on the particular circumstances surrounding the tragic death. We wish to offer our sincere condolences, through your office, to the family and friends of Alfie Gray.

Yours sincerely,



Mark Tanzer
Chief Executive

Encs.