

27 November 2025

Graeme Hughes  
His Majesty's Senior Coroner  
South Wales Central Coroner Area  
Coroner's Office  
The Old Courthouse  
Courthouse Street  
Pontypridd  
CF37 1JW

[REDACTED]

Dear Mr Hughes

Thank you for your letter concerning the sad accidental death of Master Theo Phillip Treharne-Jones in June 2019. We write in response to the Regulation 28 Report to Prevent Future Death in which Gavin Knox HM Coroner named ABTA as an interested party. We have carefully reviewed the report and your request 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 our customer support and arbitration services which deal with a range of consumer issues involving ABTA members.

ABTA also fulfils a self-regulatory role in respect of its members through its Code of Conduct and financial protection mechanisms. Concerning health, safety, and security, we provide guidance to members and raise awareness on safety issues with consumers and destination authorities.

I should point out, however, that there are many travel providers who are not ABTA members. Any company that is not an ABTA member would not have access to the advice and guidance we provide to our members on health and safety matters, or other topics. In addition, UK travellers could visit destinations without using a UK travel agent or tour operator (either ABTA member or otherwise) to make their travel arrangements.

ABTA regularly convenes a committee of Health and Safety leads from UK tour operators. We bring them together to discuss and review incidents and issues that consumers have faced while on holidays, using evidence-based information to shape guidance to members and consumers. We also collaborate with consultants and destination authorities and external stakeholders, such as the FCDO, to help consumers avoid issues overseas.

Local standards and regulations with regards to safety, health, hygiene, and security vary from country to country, and even from region to region, and there is no globally recognised tourism accommodation health and safety standard.

As part of our ongoing commitment to support improvement within the tourism accommodation sector, through collaboration with our members and a team of health, safety and security specialists, ABTA has produced a guidance publication called the ABTA tourism accommodation health & safety technical guide.

The first edition of the guide was developed in 2000/1 and is reviewed every five years; the current 2023 version is available in English and eight other languages including Greek. The guide does not seek to supersede or replace standards stipulated by local law and regulation, but in the absence of overarching international standards, it is designed for use by ABTA members, Ministries of Tourism, destination authorities, hotel associations and associated accommodation suppliers to support and assist them with a suggested pragmatic approach to their safety management processes.

The guide is intended to assist suppliers in the development of their own safety and risk management programme, to be used in conjunction with their own programme for compliance with local, regional, and national safety legislation.

Within the security section of the guide there is information relating to door locking mechanisms, I have included relevant extracts for your reference:

*Security provisions should be provided within sleeping accommodation to help prevent access by intruders.*

- *All customer room doors should be secured with an adequate locking system. Ideally doors should lock automatically when they are closed and open only with a key or electronic key card.*
- *Doors should be fitted with a double lock or dead bolt for use internally when customers are in their rooms to provide additional security.*
- *To enable customers to identify a visitor at the door, a spy hole or security chain/latch could be provided.*
- *Windows and balcony doors in the customer room should be provided with locking devices*

Within the fire safety section for all building types 1-5, the means of escape section of the guide includes information relating to the entrance doors of rooms and apartments and I have included relevant extracts for your reference:

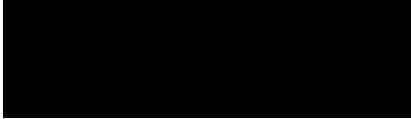
- *Entrance doors rooms and apartments should be easy to open from the inside at all times.*

We have considered your recommendation and in our view the recommendation of security chains for any other reason than highlighted above could inadvertently create fire safety risks and hamper customer evacuation in an emergency.

We will continue to work with our members and other stakeholders to make this guidance available to travellers.

*We are* not aware of the full facts in the specific case which is the subject of your report and therefore we are unable to comment any further regarding the tragic accidental death of Master Theo Phillip Treharne-Jones or the safety provisions provided at the accommodation. We wish to offer our sincere condolences, through your office, to his parents and wider family and friends.

Yours sincerely,

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Chief Executive Officer  
ABTA - The Travel Association