



[REDACTED]

Mr Gavin Knox, HM Coroner
Coroner's Office
The Old Courthouse
Courthouse Street
Pontypridd
CF37 1JW

United Kingdom

04 December 2025

Dear Mr Knox

Thank you for your Prevention of Future Deaths report dated 16 October 2025.

Before responding to your concerns, and whilst I am aware that TUI UK passed on its condolences through the Inquest process, I would like to personally express my sympathy to the family of Theo and my sadness at his death.

Your report has been considered at one of TUI Groups Safety and Risk meetings (and as you are aware relevant matters had been considered in advance of the Inquest). I have since considered, and following this careful and thorough review we have decided not to take any further action. I set out reasons for that below. In essence it is considered that any action which could be taken is likely to create significant and unacceptable risk, particularly in relation to fire.

I am aware that during the Inquest, reference was made to the Tourism Accommodation Health & Safety Technical Guide produced by ABTA. That guide was updated by ABTA in 2023 following their consultation with various industry experts. The guidance remains the materially the same as that in the 2017 guidance which was before you as regards relevant risks arising from this matter.

In relation to Fire Safety, there are different building types considered in the guide, and at the Inquest, the relevant building was type 2 (type 1 are single dwellings, the other types are classic hotel blocks of different configurations). The wording for Type 1 buildings is that, *“All doors should be easy to open from the inside at all time and should always be unobstructed”*, and for Types 2 to 5, *“Entrance doors to rooms and apartments should be easy to open from the inside at all times”*.

In relation to other doors, for example, on corridors leading from/to rooms, the guidance is that doors should open in the direction of escape, and be easy to open from the inside at all times without the use of a key.

In relation to Security, the guidance is that security provisions should be provided within sleeping accommodation to help prevent access by intruders. To enable customers to identify a visitor at the door, a spy hole or security chain/latch could be provided, but as discussed at the Inquest, the purpose of a chain/latch is to enable a customer to identify a visitor. If a chain/latch is present, and I accept that they may be present in some rooms at some accommodation, permanent use militates against fire safety guidance.

Having reviewed and considered carefully we are of the opinion that if all rooms were provided with security locks/chains (or other devices designed to control exit), that would significantly increase the risk of harm in the event of a fire or other emergency, as swift and easy exit from the room in an emergency would be hindered. We are not aware of any form of device that could control exit from the room, and at the same time, not prohibit swift exit from the room during a fire or other emergency.

I should point out that we insist upon locking mechanisms on patio doors etc, that lead directly on to “*swim up pools*”, in essence from the “*back door*” of the room, not the primary exit in the event of an emergency. This is to guard against the risk of unsupervised access to a pool, that probably does not have lifeguard provision, immediately outside the room. It does not impact the ability of the room occupants to escape in the event of an emergency.

In relation to communal pools, (and generally), hotels and other accommodation providers need to comply with local standards. Evidence was provided to you at the Inquest as regards the local standard in Greece relating to pool barriers etc, and evidence as regards the increased risk that can be created with such barriers (for example, being trapped unseen beneath pool covers, falls etc from climbing on fences). We do not provide guidance as to locks on room doors. We provide information to comply with the relevant statutory regulations. We also invite customers (or potential customers) through the safety advice hub on our website to contact us if they have



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questions re safety, and booking documents invite customers to contact their Rep in resort for help or guidance.

As I said at the outset of this response, I am terribly sorry for Theo and his family for this tragic event. Whilst at present we do not consider that we can take action, as that will unreasonably increase other risks, we will keep this under review.

TUI GroupX
Director'Group Security, Health & Safety, Crisis & BCM