



Policies & Procedures

ACCOMMODATION and LAW

Guide - September 2015



www.innkeeperslodge.com



INTRODUCTION

1. Company specific hotel policies and procedures

2. Keeping our guests safe and comfortable

3. Other Laws that apply to Hotels

ACCOMMODATION and LAW

INTRODUCTION

As providers of accommodation, our work is affected by various laws. A fundamental principle of our legal system is that ignorance is no excuse and you cannot be let off for disobeying a law just because you did not know about it.

To make sure you know all your obligations, we have produced this practical summary of the laws that you should know about and the actions you should take, ensure or prevent as a consequence.

As well as various health and safety laws we have to comply with there are various other hotel specific laws that you also need to know and are covered in this training.

These are the subject areas we will cover during this book:

Company specific hotel policies and procedures

- Hotel specific Due Diligence
- Night porter role
- Fire education and procedures
- Travel Cots
- Hotel order pads
- IKL Policy and Procedure Guide
- Safety Audits

Keeping our guests safe and comfortable

- Care of Minors
- Sofa Beds
- Guest behaviour policy
- Smoking Policy
- Do not disturb policy

Other Laws that apply to Hotels

- Equality Act
- Hotel Proprietors Act
- Data Protection Act
- CCTV
- Registration of foreign guests



Hotel Specific Due Diligence

Section 1 Company specific hotel policies and procedures

Hotel rooms pose several risks different to our pubs & restaurants.

There are separate Hotel Specific Period Business Checks. This is found in the Period Checks on the Blue Sky system.

Hotel Room Accommodation Period Due Diligence Checks					
Period	Year	Checked System	Satisfactory Y, N, NA	Corrective Action	Date Actioned
HEALTH & SAFETY					
Check the condition of the rising units.					
Ensure that all windows above ground floor have restrictors that they are working correctly.					
Ensure that risk safety checks are being conducted and filed accordingly.					
Ensure that cot speed bedding is available for each cot on site.					
Out of hours contact procedure is in place for guests to contact the duty manager in the case of an emergency.					
ADDITIONAL FIRE SAFETY					
Check that rising alarms in disabled guests' rooms are working and, if fitted, that the fire alarm light illuminates or buzzer sounds - Minimum of 2 per site to be available.					
Ensure that the Night Porter is completing the Night Porter Note check sheet on a daily basis.					
Ensure that the evacuation pack is present and complete and that the disabled guest plan is available.					
ACCOMMODATION ROOMS					
Check to ensure that the fire evacuation notice is in place and is accurate.					
Ensure that bath mats are available for rooms with baths, that they are in a good condition and that the appropriate signage "a bathmat is provided for your comfort and safety" is in place.					
Check the just-chosen alarm works where applicable in disabled rooms.					
Check that all furniture is in good condition.					
Check that carpets are in a good condition and will not cause a tripping hazard.					
Check the following for faulty wiring, damaged plugs and general safe condition:					
• TVs		• Hair dryers		• Bedside Lamps	
• Kettles		• Electric heaters		• Shaver adaptor	
• Ironing Units					
LEGIONELLA CHECKS					
Log the temperature of the hot and cold water from 3 bedrooms using a probe:					
• Nearest to the boiler					
• Furthest away from the boiler					
• One at random					
The Hot Water temperature must be above 50°C after being run for 2 mins.					
The Cold Water temperature must be below 20°C after being run for 7 mins.					
*Refer to the Legionella Water Hygiene Log Book.					
Ensure all showerheads have been serviced and descaled during the period.					
Use DTD to the correct dilution. Increase heads for 5 mins and close. If heads are fixed, apply DTD and leave for 5 mins before re-use.					
MEETING ROOMS (if applicable)					
Check the presentation equipment for faulty wiring, damaged plugs and general safe condition, e.g.:					
• Overhead projector		• Lap Top Projector		• Extension cables	
Has all presentation equipment been PAT tested?					
LEGAL					

Checks are needed for the following:

Legionella

This is a bacteria that grows in water which causes respiratory illness which can be fatal to the old and young- we need to check water is the right temperature to prevent growth. Several rooms need to be checked each period. We also need to check shower heads are being cleaned and sanitized on a monthly basis.

Fire Checks

There are no specific hotel fire checks for alarm call points and fire exits being clear. You should check all hotel fire exits as part of the main business fire checks and rotate all call points throughout the building including the hotel. You need to check all the extra fire doors (every hotel room door) and call points are logged on the core information sheet (should be in the office), and tested in turn with the rest of the business.

Summary of Checks and their Frequency

Fire Exits are clear	Daily
Fire Alarm testing	Weekly
Fire Doors	Periodic

Deaf Call alarm beacons

As we have guests sleeping overnight there is an increased risk to guests with disabilities. For this reason we have the fire alarm beacons. These are linked to the fire alarm and have a flashing beacon and vibrating pod that can be placed under a guests pillow to notify them if the fire alarm sounds.

Every lodge must have two of these units; they need to be tested each period when completing the Accommodation business checks.





Fire Evacuation and Procedures

Fire Evacuation and Procedures

The night porter/cover must be first aid trained.

All nightporters should receive a training nomination from Learning Admin.

We are required to carry out fire training every three months.

Here is a reminder of the frequency of all training required to comply with our legal requirements.

Training Subject	How often	Period(s)
Fire Training	3 monthly	2,7,9,13
H&S	Annually	9

All team members must sign the relevant document from your due diligence file after each training course to confirm attendance which enables you to confirm training has taken place.

Fire Evacuation

Evacuation is a key part of our fire strategy, ensuring that people are quickly and efficiently moved to safety. Our Escape Routes and Emergency Lighting are key elements in this and of course we must keep the Escape Routes clear at all times. Using them as temporary storage areas is not only unsightly, but could lead to prosecution if escape routes were found to be obstructed i.e. by laundry trolleys & laundry bags.

The Fire Instructions in all bedrooms and public rooms provide occupants with the basic information they need, and must be replaced immediately after any removal needed for redecoration.

Because each building is unique, the evacuation procedures and evacuation check list will be specific to the premises concerned.

This documentation should be produced comprehensively and clearly, deciding (for instance):

- Who calls the fire brigade (or gives instructions for them to be called)
- Who meets the fire brigade on arrival and assists them on site
- Who is responsible for helping any disabled guests (and how we identify such guests at check-in)
- Who attends the post-evacuation review
- Who steps into these roles when the designated person is on holiday.

Emergency Evacuation Procedures:

Investigate the location of the fire, along with another member of the team.

DO NOT PUT YOURSELF IN ANY DANGER: IF IN DOUBT LEAVE THE BUILDING

If required:

Call the fire brigade. Remember to inform them of your exact location including road name etc

- Make your way to the fire alarm panel to ascertain the area from which the cause of the fire alarm is coming
- Collect guest in house reports, any disability evacuation plans and ensure assistance is provided to guests where required
- Conduct a roll call of team members and guests at the assembly point
- Where it is safe to do so, check all bedrooms of unaccounted guests to see if the guest(s) are present

Emergency Evacuation Procedures

CONTINUED



Fire Education & Procedures

ACCOMMODATION and LAW

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Emergency Regulations & Procedures

- When the Fire Brigade arrives, meet them at the front door and escort them to the fire panel, informing them of the location of the alarm and any further information
- On instruction of the Fire Brigade that it is safe to silence the alarm, reset the fire panel and silence the alarm
- Make your way to the Assembly Point, and inform the team and guests when it is safe to re-enter the building

Throughout any evacuation procedure, ensure guests are kept up to date & informed.

Fire Procedures: House Keeper Responsibilities

- On hearing the alarm, push trolley (if applicable); put all laundry bags & cleaning equipment into the vacant room you are cleaning
This will ensure that the corridors are clear for any guests who may need to use that corridor to evacuate
- Make your way to the nearest escape route, closing any opened doors on the way, and informing guests of the need to evacuate, indicating the nearest escape route
- If you discover a fire, set the alarms off by pressing the red Fire Alarm Call point and then calmly leave the building as above. Give as much information as possible to the Duty Manager and the Fire Brigade
- Once out of the building, make your way to the Fire Assembly Point
- Assist in the roll call of In House Guests
- Do not re-enter the building until told it is safe to do so by the Duty Manager or the Fire Officer

Every member of the team should know exactly what is expected of them in the case of a fire and drills/practices/training will help ensure that evacuation goes smoothly if it is ever done for real. Everyone has a duty to ensure that the evacuation routes are kept clear and open: in particular this means never locking emergency exit doors or wedging fire doors open. But, as always, prevention is the best policy. One way in which we minimise the risk of fire is to ban certain appliances from our buildings.

We expressly forbid from any part of our hotels and team member quarters:

- Barbecues of any description (portable, disposable)
- Portable electric radiant fires
- Gas fires (with the exception of those approved for use in public areas)
- Liquefied Petroleum Gas (LPG) fires such as Calor
- Multiple plug adaptors (other than the fused 'gang' type)

In addition, we forbid from team bedrooms:

- Any cooking apparatus

Any additional room heaters must be electric oil filled radiator type heaters



Travel Cots

Travel Cots

There are specific safety checks that must be conducted and recorded every time a cot is issued. It is essential that the correct sized cot bedding is used to avoid a risk of smothering to the child.

The housekeepers should complete the check when putting up the travel cot, or if this is not a prebooked request then the manager/team member should do the check when constructing the travel cot for the guests.

These checks are only available in paper form and are not on the Blue Sky business checks.

Every completed cot check form needs to be placed in the Yellow safety check folder.

Click here to watch the training videos on the Travel Cots.

Cots Check List

The issuing employee must carry out this check whenever a cot is requested. Copies of the checklist must be filed in the period that the cot is issued.

Cots with defects or which are not up to the required standard of cleanliness must be taken out of service and not used until repaired, cleaned or replaced.

Room number: _____

Person carrying out check: _____

Date: _____

Standard	Yes	No	Comments
Nominated standard			
Of sound construction			
Free from screws or sharp edges			
Stable and secure			
Locking system in place			
Clean and free of staining etc			
Mattress is nominated standard			
Mattress is clean and stain-free			
All cot bed bedding is available: <ul style="list-style-type: none"> • Fitted Sheet • Flat Sheet • Cot Blanket 			
All cot bedding should be stored in a covered box when not in use			

Hotel Order Pads

Hotel Order Pads

There are many specific items you will need for your hotel business, that are not available to order in the same way as the non consumables for the business. A specific hotel order pad is available via the Outlet Document Library on the Hotels Page. Items such as breakfast equipment, bedding, IKL uniform, tea trays and travel cots are ordered from here which is then processed via the 5555 team.

Innkeeper's Lodge Policy & Procedure Guide

Innkeeper's Lodge Policy & Procedure Guide

A separate safety and procedures manual exists for our hotel operations. The managers are required to sign this policy in the same way as for the Retail Safety Policy.

Some of the key policies are covered in this training course but you should familiarize yourself with the document and its procedures.

Safety Audits

Safety Audits

In the same way that NSF audits the businesses and food operation, there is a specific safety audit for the hotel operations. This is undertaken by a different company, at a separate time and is completed twice a year.

The audit template is available on the Outlet Document Library Safety Assurance Page.

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Care of minors

Key Points:

Section 2 Keeping our guests safe & comfortable

Care of minors

Care of minors (those under 18 years of age) comes within the scope of the Occupiers Liability Act 1957 ("the OLA") or in Scotland the Occupiers' Liability (Scotland) Act 1960 and it is the only part of those Acts that concerns us here.

The reason for the legislation is quite logical: children are presumed to be less responsible than adults and therefore need to have more supervision and care exercised on their behalf. This does not mean that parents and adults do not have to take responsibility for children, but we are more concerned with preventing accidents altogether than simply apportioning blame when they occur.

The company takes responsibility for the safety of the premises, with our Safety Assurance team carrying out an assessment to identify and remove potential hazards. They will consider the size, height and opening apertures of windows - this is why all hotel room windows and those in corridors must have opening restrictors fitted, as well as the more obvious "allurements" that could entice children into danger.

You must ensure all storage cupboards and other rooms accessible from the hotel corridors are locked at all times to prevent children gaining access. This is particularly important where chemicals are involved.

Once the premises have been secured, it is up to each and every member of the team to be vigilant and proactive as far as children (in particular) are concerned. We need to keep them away from kitchens, cleaning products, doors, traffic and so on.

All trolleys, laundry and housekeeping products & equipment must be locked away and secured when not in use. We also need to ensure that the breakfast equipment is stored safely and cannot be accessed by guests outside of breakfast serving times.

Key Points

- If you see a child on their own, stop whatever you are doing and take him or her back to the adults who are responsible
- Ensure all laundry & storage rooms are kept locked outside of housekeeping hours. The keys for these areas must be kept on site at all times
- Note any cupboards, storerooms or other places where a child could hide and check them out regularly
- Where possible, keep stores, ladders, knives and cleaning products out of a child's reach
- Do not leave electrical appliances plugged in and unattended

As well as taking actions ourselves, we should be ensuring that guests know – and follow – company policy. Our policy is to **recommend** that no child under the age of **16** should be left in a room on their own.

Children under the age of 16 cannot be booked into a room on their own. They must be accompanied by an adult staying in the same room.

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Sofa Beds

Sofa Beds

Our sofa beds are designed to be made up in full with pillows stored in the head rests and folded away when not in use.

As and when requested, a sofa bed can be transformed into a bed, straightening the bedding, removing the pillows from the head rests and replacing the cushion on the pillows.

Sofa beds are only set as a bed when requested at the time of booking which will show up on the arrivals list. They need to be left set as a sofa at all other times.

There may be times in the day/night where a guest requests a sofa bed to be made up when the Housekeeping team has left the premises. To help you train your team members there is a video on making the sofa bed which can be found on Our Hub.

By doing this it creates a better guest experience, gives the guest more space in the room and saves on additional laundry costs.

Guest Behavior Policy

Guest Behavior Policy

An organisation of our size and standing needs to make it clear what is and what is not acceptable behaviour on the part of guests. Guests whose behaviour falls below the standards we set will interfere with the enjoyment of other guests – to whom we have an obligation.

The guest behaviour policy appears on the terms and conditions. The guests sign up to these terms upon checking in. Any guest who demonstrates unacceptable behaviour can be removed from the hotel. If this occurs they are not able to get a refund for any unused element of the booking.

Remember if you are dealing with a confrontational situation you must not go into a guest's room on your own. You should always be accompanied. As per the policy section you should request that a guest comes to reception to discuss their behavior.

What are the main points of our guest behaviour policy?

This is what the Innkeeper's Lodge guest policy states:

We thank you for choosing Innkeeper's Lodge and we hope you have a relaxing and pleasant stay.

We like to ensure that every guest has a peaceful and enjoyable stay with us. All guests are therefore expected to abide by this policy at all times.

We would ask that all guests behave in an appropriate manner and respect other guests' desire for a peaceful and relaxing stay with us. We reserve the right at all times to ask you and/or any member of your party to leave the premises immediately if your/their conduct is considered by us to be

- a) Inappropriate in any way*
- b) Likely to cause harm, offence, disruption or discomfort to other guests or our staff*
- c) Likely to cause damage to our property or other guests' property*
- d) contrary to the spirit of this policy*

If you and/or any member of your party are subsequently requested to leave the premises, we will be under no obligation to grant any refunds following payment for the room(s) on arrival. Furthermore, we reserve the right either during or after your stay to recover from you the costs of all or any of the following as a result of any such behaviour by you or any member of your party:

- 1. Any compensation we may pay to others, including other guests adversely affected by your/ your party's inappropriate behaviour;*
- 2. Any costs arising from damage to our property or guest property; and*
- 3. Any other costs, charges, fees or levies we may incur resulting from your/any member of your party's action or inaction or from any breach of this policy.*

Please note that by making a reservation for a room and staying With us you unconditionally agree to abide by the terms of this Policy at all times during your stay.



Smoking Policy

Smoking Policy

All Innkeeper's Lodge hotel rooms are non smoking. The room is still a workplace for the housekeepers, and it is stipulated in the T's & C's upon booking that all of our rooms are non smoking.

Under the terms and conditions guests can be charged for cleaning a room if they do smoke in it.

Charges can be applied to the debit or credit card used at the time of booking. A letter **must** be sent to the guest informing them of this – a copy of this letter is held on the ODL / Hotels / Policies and Procedures.

The same applies to charges for cleaning of soiled rooms.

You can only make a charge when the room has to be taken off sale for the next available night.

You are required to gather evidence of the room soiling before making the charge. If a housekeeper notifies you of a problem this must be confirmed by visiting the room and taking any appropriate photographs.

Do not disturb policy

Do not disturb policy

"Do Not Disturb" signs must be honored until check-out time of noon under any circumstance, except in an event requiring life safety measures.

Day of check-out:

When the guestroom is scheduled for check-out and the check-out time has passed, the Manager on Duty or the Housekeeping Supervisor must first call and then visit the room. If there is no answer, determine if the guest plans to extend their stay or has already departed.

Stay-over:

The housekeeping team check on a room at the end of their shift and if the DND sign is still in place, the housekeeper must note this on their housekeeping sheet and then in the Handover Diary at reception. They would then need to place a DND Service note under the door & leave a small bag of goods (containing towels, toilet roll and tea tray items) outside the room.

If the bag of goods is still present outside the room the following morning and the guest has not made contact then the Housekeeper must call the manager to check the room.

- For safety purposes, each guest must be checked on at least once during each 24-hour period. The Manager on Duty must verify the time of check-in, and if the 24-hour period has passed, must call the guest
- If there is no answer, the Manager on Duty must physically check the room with another colleague present
- If the guest is not in the room, a DND Service note must be left in the guest room
- If the guest is in the room, the Manager on Duty should explain the hotel's safety policy, apologise for any disturbance, and offer housekeeping services if the guest wishes

Section 3 Other Laws that apply to our Hotels

Equality Act

The Equality Act 2010 replaced the Disability Discrimination Act, although the requirements are broadly the same. This is mainly to ensure that people are not given less favourable treatment in any walk of life simply because they have a disability.

This affects us as an organisation both in terms of employees and guests, but the emphasis in these modules is on our guests.

The law says that we must not discriminate against disabled guests by providing them with inferior goods, services or treatment, but what does this mean in practice?

What are we obliged to do by the Equality Act?

Do we treat all guests (including those with disabilities) exactly the same?

No. Treating all guests the same is not the solution – in fact it may be the problem. We need to treat everyone appropriately, which may mean providing a different service to disabled people (large print, special access) in order that they can gain the same degree of enjoyment.

Is it true we cannot refuse to serve anyone who is disabled?

No. We can refuse to serve a disabled person but not because he or she is disabled. We can decline to serve them for reasons of behaviour or intoxication, provided that we apply the same principles without fear or favour.

Do we have to make reasonable adjustments if standard procedures are not acceptable to disabled people?

No. The test is not whether our standard procedures are acceptable to disabled people but whether they meet their needs. The fact that a disabled person might 'accept' our normal way of doing things does not remove our obligation to make proper provision under the Act.

Do we need to be prepared to accept a complaint about unfavourable treatment from any guest?

No. Only a disabled person affected or the Disability Rights Commission on their behalf can make a complaint.

What does the EQUALITY ACT cover, how does it operate and whom does it protect?

- The Equality Act applies to all UK providers of goods and services
- They must offer disabled people equal access to their goods and services, without financial or other penalties
- They must make reasonable adjustments where necessary
- Breach of the law is punishable by prosecution and fines
- The Equality Act protects all disabled people as defined by the Act, whether or not they are registered as disabled

However you expressed your own understanding of the Act, the main points to take on board are that service providers are obliged to make reasonable adjustments to facilitate equal access for disabled people, and that they may be prosecuted and fined if they fail to do so.

CONTINUED



Equality ACT

Equality ACT CONTINUED

Of course, in our competitive world the most serious consequence of failing to meet the EQUALITY ACT's requirements will be loss of reputation, loss of custom and loss of income. Meeting the requirements of the Act is not a luxury, but a necessity.

We have talked generally so far about disabled people, but are we clear about who they are? With the clue that the Equality Act redefined what it means to have a disability, do you know what is included?

The legal definition of disability is based on a condition of mental or physical impairment that has a substantial adverse effect upon the person's ability to carry out normal day-to-day activities and lasts for at least 12 months.

To help you differentiate, here are some examples of what is or isn't classed as a disability.

Example	Yes	No	
Person with stammer	Yes		If the stammer is so severe that it makes normal work difficult
Person with learning difficulties	Yes		They may find it hard to absorb and retain information
Person with artificial leg	Yes		Even though he or she may get about perfectly well, the disability itself has not gone away (similar argument applies to hearing aids).
Person using wheelchair	Yes		
Person with concussion		No	
Person with poor command of English		No	Unless it is caused by a mental or other impairment
Person with broken leg		No	However temporarily restrictive, this is unlikely to be a lasting condition

Let's now get down to some of the practicalities. The most practical point of all is that the EQUALITY ACT affects each and every employee, since an individual can be personally liable if he or she breaks the law. This is not something you or your team can ignore – as we said earlier, ignorance of the law is not an acceptable excuse for breaking it.

CONTINUED

Equality ACT CONTINUED

1. Have a read of the four possible scenarios of the Equality Act

A guest with a very bad stutter is taking a long time to check out, having raised a query about his bill, and other guests in the queue behind him are getting restless. The guest with the speech impairment is politely asked to wait while the other guests are quickly attended to, and he then receives the receptionist's full attention.

Is this discrimination?

Yes, although this helps the other guests, it discriminates against the disabled guest (a speech impairment of this kind is a disability).

2. A partially-sighted guest complains that the print on the menu is too small for him to read.

Is this discrimination?

No, as long as a reasonable adjustment is made, such as reading out the menu to the guest or discussing the options available. 'Reasonable adjustments' are not always matters of company policy; they can also be matters of individual behaviour.

3. A pregnant woman asks for a more comfortable dining room chair, but you are unable to provide one before she finishes her meal.

Is this discrimination?

No: pregnancy is not a condition that falls within the scope of the Equality Act. Failing to change the chair might be poor service, but it is not discrimination.

4. A guest with a blue disability sticker on her car arrives to find that all the designated accessible parking spaces are full. She complains.

Is this discrimination?

No, provided the spaces are occupied by other badge holders. We must do our best to ensure that other guests do not park in these areas.

Equality ACT CONTINUED

Our policy on disability is expressed in the following promise to disabled guests, that you should be familiar with. Please note that this is for internal guidance and not for public display.

- We will spend time evaluating what the person with a disability might need us to do to help them.
- We will always listen to the requirements of disabled guests and be flexible and willing to accommodate e.g. use of temporary ramps.
- We will ensure that team members can provide advance information on the layout and facilities.
- We will be prepared to move tables around for parties including disabled persons.
- We will take time to understand the difficulties facing disabled persons and respond accordingly.
- When taking bookings for function rooms/letting bedrooms that are not accessible to physically disabled people we will make sure that we inform the person booking that this is the case.
- We will ensure any disabled parking spaces are restricted to disabled people.
- We will ensure ramps are cleared of snow during winter.
- We will make sure that we are aware of guests who may need special assistance in the event of an emergency and help them accordingly.
- We will ensure that disabled toilets are clean, obstruction free, not used as storage rooms and well lit. We will carry out regular checks. If RADAR keys are used we will make sure that they are readily available.
- We will read out information to guests as required.
- Assisted dogs i.e. guide dogs and hearing dogs for the deaf are welcome in all MAB premises including dogs in training this includes our hotel rooms.
- We will ensure that lighting is always on and working during trading hours.
- We will take the time to write information down for guests as required.
- We will provide easy to handle glasses and straws including at breakfast if available.
- We will be patient and allow guests to finish what they are saying.

If in doubt ask the guest. Most disabled people would far rather be asked how you can help them rather than making assumptions.

HOTEL PROPRIETORS ACT

The second Act we will consider is the Hotel Proprietors Act 1956 (“the HPA), covering our obligations towards guests and their property. It states that we are responsible for loss, damage or theft if the incident was caused by ‘default, neglect or a wilful act’ on the part of a manager or member of staff. We are not responsible for loss, damage or theft caused by guests’ carelessness. The majority of our responsibilities can be met by following laid down procedures for housekeeping and issuing keys, but we also need to show a little initiative in reporting items like faulty locks or windows. We obviously accept responsibility for items that are handed over for safe keeping (although we are not actually obliged to keep them in a safe). The HPA is very clear about the period over which our responsibility extends and our financial liability.

For example

For a guest who pays for accommodation on Tuesday and Wednesday nights, we are responsible for the period from midnight on Monday to midnight on Thursday. In other words from the midnight before to the midnight after the period of the guest’s entitlement to occupy the room.

How much can a guest claim in compensation?

There is a maximum of £50 per item and a maximum of £100 in total except in London, where the figures were increased to £750 and £1,500 respectively under the London Local Authorities Act 2004. The guest must have booked sleeping accommodation to qualify.

Incidentally, the law does not specify how long a guest has to make a claim, but our operational guideline is six to eight weeks after the event. It is hard to imagine a guest going any longer without discovering their loss and being clear about when it must have happened.

Here are the key points from the Hotel Proprietors Act, 1956:

“Under the Hotel Proprietors Act, 1956, a hotel proprietor may in certain circumstances be liable to make good any loss of or damage to a guest’s property even though it was not due to any fault of the proprietor or staff of the hotel. This liability however-

- (a) extends only to the property of guests who have engaged sleeping accommodation at the hotel;
- (b) is limited to £50* for any one article and a total of £100** in the case of any one guest, except in the case of property which has been deposited, or offered for deposit, for safe custody;
- (c) does not cover motor-cars or other vehicles of any kind or any property left in them, or horses or other live animals.

This notice does not constitute an admission either that the Act applies to this hotel or that liability thereunder attaches to the proprietor of this hotel in any particular case.”

*£750 for Inner M25 area

**£1500 for Inner M25 area

HOTEL PROPRIETORS ACT

HOTEL PROPRIETORS ACT CONTINUED

Please note these procedures to follow in respect of the Hotel Proprietors Act:

- All hotels must display a notice in the reception area confirming the guest's right under the HPA. You should check that this is always accessible for guests to read. – A copy of this notice is found on the Outlet Document Library / Hotels / policies and procedures.
- If a guest believes that loss, damage or theft has occurred and the hotel is responsible, you should complete an Incident Report Form and submit this to the Safety Assurance Team.
- You should also notify your Retail Business Manager and contact the Police if you suspect a crime has been committed.



DATA PROTECTION ACT

Data Protection Act

The Data Protection Act 1998 ("the DPA") has far-reaching implications in most parts of our lives. As individuals, it means that if we give information to a company when making a booking or buying a product they cannot use that information for any other purpose without our agreement. As businesses, we must collect and manage data about guests according to those rules. We collect what the DPA calls 'personal data' about guests in the form of their name, address, contact details and means by which they make payment. (We do not normally handle what is termed 'sensitive personal data', e.g. criminal records and ethnic origins.) We may only ask for data that we need to provide the service the guest requires, All the data you collect will be held at your business on the guest registration card. You must ensure these are kept securely to prevent unauthorised access.

You cannot disregard old registration cards; they must be filed each week in your WSOB pack. These will be collected and archived.

We obtain the following information when a guest makes a booking, as you will see, we do not collect information because it is interesting but because it is useful.

Name

Home address or business address (if it's for a business booking)

Email address

Contact telephone number

Credit/debit card to secure the room with

Nationality

Passport number (for registration of 'foreign guests')

Car registration number (only if they arrive by car)

CONTINUED



DATA PROTECTION ACT

CCTV

DATA PROTECTION ACT CONTINUED

As individuals and as a company we need to ensure that we keep data secure and manage it responsibly. This means having procedures to prevent unauthorised or accidental disclosure of manual records or electronic files. It also means enabling guests to view the data we hold about them. They can write to request this, and we are obliged to provide the information within 40 days if they do so. It is only fair and reasonable that a guest should have sight of the information we hold about them, to ensure that it is correct or to request its deletion – we hold information for as long as necessary, not as long as possible.

Please note: This information regarding a guest can only legitimately be seen by the following:

- **Police**
- **Income Tax office**
- **Job Centre**

Only the police and the government in its various forms (e.g. Tax Office, Job centre) have the right to ask for personal data. However close their relationship and however convincing their story, the answer to anyone else is a polite but firm 'No'

Although it may never affect you, you should still know that under no circumstances can you transfer personal data outside the EU.

CCTV

We use CCTV for the prevention and detection of crime, the apprehension of criminals and ensuring the safety of our teams and the public. CCTV actually comes under the Data Protection Act, because the images we record and retain are deemed to be personal data. This means that we can only retain them for a maximum of 28 days unless there is a request from the Police, H.M. Revenue and Customs, the data subject(s) or their legal representative(s) to keep them longer. All these people may request to preserve or view CCTV footage, although the data subject is not necessarily entitled to a copy of it.

How do you respond to a request for a copy of CCTV footage?

Refer all requests to the Assistant Company Secretary – this must usually be done in writing

The Assistant Company Secretary may authorise you to hand over footage, but you cannot do so without such authority.

In the event that permission is given, you will need to obtain a receipt from the person to whom you pass any tapes or copies. The only exception to this procedure would be any request from the Police where they request the footage immediately or within a specified amount of time (e.g. within 48 hours). Since the Police have a legal right to seize CCTV footage, a request by them cannot be refused. In such circumstances you must obtain a receipt for the material and inform the Safety Support Team immediately of the action you have taken.

As a general rule, consent is usually required from all those people who feature in the CCTV footage before it can be given out. If guests ask why they are being filmed, explain to them that it is for their own safety and security. We do not retain the information, and we do not pass it on to anyone unless there is an official request on the grounds that a crime may have been committed.



REGISTRATION OF FOREIGN GUESTS

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In an earlier section, we noted that you need only ask for passport details from 'foreign guests'. We will now cover that category more fully, because it entails special registration procedures. Firstly, it is important that you know who qualify as foreign guests.

The following are classified as foreign guests:

People from other EU countries & People from the USA

People from other UK countries are not foreign guests. Neither are citizens of the Republic of Ireland or the Commonwealth, but that is as far as it goes. Under the definition within the British Nationality Act 1971, "a person who is neither a Commonwealth citizen nor a British protected person nor a citizen of the Republic of Ireland" is an "alien". We prefer to call them foreign guests, but the point is the same that they must be documented in a particular way.

Full and correct documentation of foreign guests is important, given that the requirements are laid down by the Secretary of State using powers conferred by the Immigration Act 1971.

What information do we need to collect about foreign guests?

On arrival

- Date
- Their full name if over 16 years old
- Their nationality
- The number and place of issue of their passport
- A certificate of registration or other document establishing their ID and nationality

On departure

- Date
- The destination (and address if possible) to which they are going next

These records must be retained for at least 12 months, and be available for inspection at any time by a constable or anyone else duly authorised by the Secretary of State.