
Report of the Guest Houses Review Group

*An inquiry into preventing and disrupting the
exploitation of vulnerable people in guest houses*

Commissioned by Oxford City Council's Scrutiny
Committee

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- From Elmore Community Support Team: Liz Patterson
- From Experience Oxfordshire: Vanessa Allan
- From Oxford City Council: Richard Adams, Linda Ludlow, Val Johnson and Ian Wright
- From Oxfordshire County Council: Paul Malloy and Richard Webb
- From Thames Valley Police: Rachel Patterson

Foreword by the Chair of the Guest Houses Review Group

It is evident that the scale of crimes of exploitation is far greater than previously realised. Investigations by police forces from across the United Kingdom continue to find that child rape, adult trafficking, forced labour and sexual exploitation offences continue to take place – including through organised exploitation of some of the most vulnerable people within our communities.

District councils, like Oxford City Council, have a key role to play in safeguarding the environment where young people may congregate, meet or stay. It is clear some offences of exploitation took place within a number of Oxford's guest houses. Some of these detected offences centred on organised exploitation of vulnerable children. Other detected offences include organised, deceitful trafficking of young adults from overseas. The appalling consequences for each of the victims left many with a lack of self-esteem, a feeling of worthlessness and a shadow blighting their lives.

Councillors are concerned that the powers available to the authorities for ensuring the safety of vulnerable members of the public within guest houses are inadequate. The Council's powers in this sector are limited to issues of food safety and health and safety at work. In conducting this review, councillors wanted to understand whether there is more that could reasonably be done to deter, disrupt and prevent opportunities for exploitation of children and adults in guest houses.

In coming to our recommendations, we established that some owners of guest houses already work to very good standards, sharing suspicions and incidents with the police and having various measures in place that can deter potential perpetrators – the Review Group commends such voluntary initiatives. In providing evidence, owners of other establishments accept they have had little oversight of who comes and goes from guest rooms, but each showed a willingness to improve standards.

Consequently, a core recommendation from the Review Group is for a voluntary code of good practice – with a degree of oversight to ensure the spirit of the code is acted upon. The desire of the Review Group is that a significant number of guest house owners will sign up for this code. Hopefully, there will be few premises which do not comply. Together with this, the Review Group encourages the extension of "Hotel Watch" to help build closer relationships – across the hospitality industry, and with statutory authorities. And, the "Say Something if You See Something" initiative should be promoted throughout the hospitality sector. Each recommendation, if agreed, will help raise awareness, deter offenders, identify offences – and, most importantly, improve the protection of vulnerable people.

In conclusion, the Review Group would like to thank the representatives of statutory and voluntary organisations for providing evidence – and, in particular, we wish to thank the representatives of Oxford guest houses for their frank and open contributions at our closed hearings. I extend my personal thanks to my colleague councillors – and to our committee clerk, Andrew Brown – for their support and dedicated work.

Councillor Van Coulter
Chair for the Guest House Review Group

Summary of recommendations

Recommendation 1 – That the City Council should maintain an accurate list of guest houses operating in the Oxford area that is updated at least annually (The Human Exploitation Co-ordinator has produced a basic list which could be developed into an accurate list).

Recommendation 2 – That the City Council should, in consultation and collaboration with other relevant statutory, commercial and voluntary agencies, lead on the introduction of a voluntary code of good practice for owners of guest houses in the Oxford area to sign up to. This code should be jointly branded and linked to existing initiatives such as the Say Something if you See Something campaign.

Recommendation 3 – That, subject to further consultation, the voluntary code of good practice should commit owners of guest houses operating in Oxford to the following practices which would help to protect guest house owners and their businesses as well as guests and the wider community. These practices should extend to subcontractors working in guest houses where relevant:

- a) Signing up to a basic safeguarding policy statement;*
- b) Providing details of an identified ‘single point of contact’ who has oversight of the running of the guest house and is responsible for ensuring compliance with the code of good practice;*
- c) Having an identified responsible person on duty at the guest house at all times during its hours of operation;*
- d) Providing Basic Disclosure certificates for the single point of contact and responsible person(s) and if possible, obtaining certificates for all staff who permanently or regularly work in the guest house;*
- e) Having a free crime prevention check every 3 years and implementing recommendations made by the Crime Prevention and Reduction Advisor;*
- f) Cooperating with the police, including by providing available CCTV footage upon request and allowing the police to freely enter the premises where illegal behaviour is suspected to be taking place;*
- g) Registering with Thames Valley Alert and participating in the hotel partnership to strengthen two-way information sharing between guest houses and the authorities;*
- h) Retaining records of the single point of contact and responsible person(s) completing the ECPAT ‘Every Child, Everywhere’ e-learning course, and providing all staff working in the guest house with the Thames Valley Police Staff Guide for the hotel trade;*
- i) Having a ‘no cash without ID’ policy, recording vehicle registration numbers where relevant and requiring visitors to register with reception;*
- j) Holding and restricting access to master keys for all rooms and ensuring that guest rooms are checked daily;*
- k) Having suitable and proportionate arrangements in place for monitoring comings and goings at the premises, including during the night, and where relevant, retaining CCTV footage for a minimum of 28 days.*

Recommendation 4 – That the owners of guest houses in the Oxford area should be asked to self-certify that they comply with the voluntary code of good practice on an annual basis. This process could be prompted by a letter signed by the Local Policing Area Commander, as well as through the hotel partnership and any other relevant channels.

Recommendation 5 – That guest house owners signed up to the code should be signposted to sources of advice and guidance.

Recommendation 6 – That the City Council asks Thames Valley Police to give prompt attention to requests for assistance at local guest houses.

Recommendation 7 – That relevant agencies including City Council functions such as Environmental Health and Community Safety, and those provided by partner organisations such as the Thames Valley Police, Oxfordshire Fire and Rescue Service and Trading Standards, should be asked to report to the code administrator if they have reason to believe that, having been signed up to the voluntary code of good practice, the management of a guest house is non-compliant with it. The single point of contact should then be asked to demonstrate that they have addressed the concerns raised or risk being suspended from the code.

Recommendation 8 – That the administration of the voluntary code of good practice should be adequately resourced. Consideration should be given to where in the organisation this responsibility should sit but the Human Exploitation Manager should have oversight of this administrative function.

Recommendation 9 – That a suitable logo should be created for the voluntary code of good practice that could be displayed on guest house websites.

Recommendation 10 – That a list of guest houses covered by the voluntary code of good practice should be displayed on the City Council’s website together with details of what the owners of these guest houses have signed up to. The introduction of the code should also be promoted to targeted institutions, such as language schools, as well as more widely, including through a City Council press release.

Recommendation 11 – That Experience Oxfordshire should be informed which guest houses are covered by the voluntary code of good practice and asked to display the logo next to participating guest houses on their website.

Recommendation 12 – That the City Council should encourage the larger tour operators and hotels operating in Oxford to sign up to the Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism.

Recommendation 13 – That the City Council should ask organisations such as Experience Oxfordshire and the local Chamber of Commerce to do more to promote the Say Something if you See Something campaign, including through existing relationships.

Recommendation 14 – That the City Council should look for opportunities to join with partners, perhaps through the National Working Group, in pressing government to:

- a) Grant additional powers to local authorities to require the embedding of good practices in guest houses,*
- b) Do more to involve the hotel accreditation agencies and major travel website companies, as well as guest houses, in efforts to promote good safeguarding practices in the hospitality sector;*
- c) Introduce a public awareness campaign that empowers people to come forward with safeguarding concerns.*

Introduction

1. The Guest Houses Review Group is a cross-party working group established by Oxford City Council's Scrutiny Committee during the 2015/16 municipal year. The Review Group's membership comprises Councillors Coulter (Chair), Paule, Royce and Simmons. Councillor Paule replaced Councillor Lygo when he became a member of the City Executive Board during the early stages of this review.

Background

2. In 2013, seven men were found guilty of human exploitation and trafficking young British girls from Oxford across the UK¹. An Oxford guest house was identified as one of a number of premises where the offenders took young girls to have sex.
3. The Serious Case Review released in 2015 identified a systematic failure by local authorities and the police. The report recommended increased awareness-raising with front line professionals, schools, parents and the communities, and that hotels and B&Bs should be included in awareness-raising².
4. Hotels and guest houses have also been used for the purpose of Child Sexual Exploitation (CSE) in other UK cities.

*"A feature of recent CSE cases has been the use of premises such as hotels, take-away outlets or accommodation to groom and sexually exploit children."*³

5. The Anti-social Behaviour, Crime and Policing Act 2014 requires the owner, operator or manager of a hotel or guest house to provide guests' name and address details to the police where the officer has a reasonable belief that child sexual exploitation, or conduct connected with it, is taking place.

*"These provisions address the problem of hotels, guest houses and bed and breakfast accommodation being used for the purpose of child sexual exploitation."*⁴

6. Another Oxford guest house was entered and searched by the authorities in 2014 as part of a multi-agency operation. Two people were arrested on suspicion of arranging for people to be brought into Britain for the sex trade.
7. The powers available to City Council and other statutory agencies are limited in terms of protecting vulnerable children and adults in guest houses. The roles and powers of statutory agencies in this sector are set out in appendix 3.
8. A key ambition of Oxford City Council is to become a 'leader of place' through partnership working and collaboration. This means that the City Council wants to be recognised as being the leading authority and voice for the city of Oxford.

¹ [Oxford exploitation trial: Guilty verdicts over child rapes, BBC News, 14 May 2013](#)

² [Serious Case Review into Child Sexual Exploitation in Oxfordshire: from the experiences of Children A, B, C, D, E, and F, Oxfordshire Safeguarding Children Board, 26 February 2015, p. 25](#)

³ [Anti-Social Behaviour, Crime and Policing Act 2014, Part 9, paragraph 32](#)

⁴ [Anti-social Behaviour, Crime and Policing Bill Fact sheet: Child sexual exploitation at hotels, The Home Office, January 2014](#)

9. Members of the Scrutiny Committee have expressed concerns that the regulatory framework and responsibility for ensuring the safety of vulnerable people in these publically accessible premises remains inadequate, and wanted to review whether more could reasonably be done. The Scrutiny Committee prioritised this review when agreeing its 2015/16 work programme in June 2015.

Terms of reference

10. The Guest Houses Review Group met six times from August to November 2015. At its first meeting the Review Group agreed that its remit should be:

To understand what is already being done to prevent exploitation in guest houses and explore the case for further interventions, including the introduction of a voluntary code of practice for providers.

11. The project scope for this review was agreed by the City Council's Scrutiny Committee on 7 September and is included as Appendix 2.
12. There is no single comprehensive definition of what constitutes a guest house but for the purposes of this review, the term 'guest house' refers to any private house that is not licensed to serve alcohol in which a number of guest rooms are offered to paying guests. Guest houses are typically owner-managed businesses based in the proprietor's own home and the term 'guest house' or 'bed and breakfast' (B&B) is usually included in the name of such establishments.

Methods of investigation

13. The Review Group's findings and recommendations have been informed by evidence provided by a number of council officers, representatives of statutory and voluntary agencies and people who run guest houses, as well as desk research. To ensure a full and frank debate, all meetings were held under Chatham House rules and the Review Group agreed not to identify the individual guest house owners they interviewed or their premises. The Review Group has:
- Held discussions with representatives of 3 different Oxford guest houses;
 - Met with Council officers and representatives of statutory and voluntary agencies that have some professional involvement with guest houses. The roles and powers of the agencies are set out in appendix 3;
 - Reviewed briefing notes and written evidence provided by Council officers, external witnesses and members of the Review Group;
 - Reviewed relevant documentation including:
 - The Anti-social Behaviour, Crime and Policing Act 2014;
 - Anti-social Behaviour, Crime and Policing Bill Fact sheet: Child sexual exploitation at hotels;
 - Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism;
 - Say Something if You See Something campaign literature;
 - Say Something if you See Something action plan;
 - Letters sent to guest houses and hotel head officers from the Oxford Safer Communities Partnership in 2011;

- Information on complying with fire safety law for people who provide sleeping accommodation;
- Thames Valley Police Staff Guide for the hotel trade;
- National and local press articles.

Findings and recommendations

Recent improvements to safeguarding practices

14. The Independent Chair of Oxfordshire Safeguarding Children Board has reported that evidenced improvements are being made by Oxfordshire agencies in response to Bullfinch and the Serious Case Review. A detailed account of this progress is set out in [Child Sexual Exploitation in Oxfordshire: Agency responses since 2011](#) (paragraph 4.26).

“Agencies in Oxfordshire have made great strides towards making children safer from child sexual exploitation but there is still more to be done”⁵.

15. The Review Group has identified those measures that contribute to protecting vulnerable children and adults more specifically in guest houses (see appendix 4). These national and local measures notably include the requirement of the Anti-social Behaviour, Crime and Policing Act 2014 for guest houses to provide name and address details of guests to the police upon request, joint operations at guest houses where activities linked to CSE and human trafficking were suspected to be taking place and the roll out of the sector-led ‘Hotel Watch’ partnership across Oxfordshire by spring 2016. This will provide a forum for improved information sharing between guest houses and the police.

16. In discussion with people involved in running Oxford guest houses, the Review Group identified good practices that can help to reduce (but not eliminate) instances of guests causing problems and exhibiting concerning or suspicious behaviour. These good practices are also set out in paragraphs 32-51.

Remits and constraints of inspecting authorities

17. A police officer of at least the rank of inspector can require the owner, operator or manager of a guest house to provide guests’ name and addresses where the officer has a reasonable belief that CSE or conduct connected to it has been or will be taking place on the premises. The police can use legislation to enter and inspect guest houses but first require either a warrant or intelligence that justifies entry. Police powers of entry and enforcement remain considerably less substantial for guest houses that are unlicensed to sell alcohol than for licensed premises such as public houses. Powers to close premises are available to the police under the Sexual Offences Act, and these closure powers were extended in 2014 to cover a broader range of offences.

18. Oxford City Council’s Environmental Health Service has powers to inspect guest houses for food safety and health and safety at work. The frequency of inspections under both sets of legislation is based on an assessment of risk. Guest houses are likely to be assessed as low risk for food safety and checked every 2-3 years. The period between unannounced physical inspections could be

⁵ [Child Sexual Exploitation in Oxfordshire: Agency responses since 2011, Oxfordshire Safeguarding Children Board, February 2015, p. 3](#)

as long as 6 years if a lower level intervention, such as a questionnaire, is deemed to be sufficient when alternate checks are due to take place. Guest houses are also deemed to be low risk premises for health and safety at work and are not routinely inspected, although this legislation does contain powers to close premises where serious breaches have taken place. While their remit is not directly related to safeguarding, Environmental Health Officers are trained to look harder for other types of issues and hazards if there is good reason to do so.

19. Oxfordshire Fire and Rescue Service has powers to inspect guest houses for fire safety and do so routinely every 1-3 years. Inspectors have powers of entry and can access all parts of a building if deemed necessary. The Fire and Rescue Service can take formal enforcement action if they find a serious fire risk that the owner is not managing.
20. Even taking routine inspections by the Fire and Rescue Service and Environmental Health together, the period between unannounced inspections of particular guest houses could be as long as 3 years in some cases.
21. The Review Group heard from professionals involved in preventing and disrupting human exploitation that the existing remits and powers of the various authorities do not enable them to get to the core of the issue of protecting vulnerable people in guest houses. The authorities will however seek to disrupt activity using all available powers where evidence of exploitation alone is not strong enough.

Guest houses operating in Oxford

22. As not all guest houses are required to register as food businesses in the city, the City Council does not currently hold a comprehensive up to date list of guest houses operating in Oxford. To the best of the Review Group's knowledge none of the other statutory agencies do either. Without an accurate list, the authorities cannot communicate to all guest houses to raise issues of safeguarding.
23. The Review Group enquired as to whether a list of guest houses could be extracted from the business rates data held by the Council but found that this would not be possible. A list would need to be compiled using online research.
24. The Review Group has produced its own rudimentary list of guest houses from those advertised on two travel websites. 49 guest houses and B&Bs were identified as operating in the city but this exercise is unlikely to have identified all of them. Numerous guest houses are also located just outside the city, including in Botley, Cumnor, Kennington, Kidlington and Sandwell-on-Thames.
25. The Council's Human Exploitation Co-ordinator has also produced a list using online research and has identified some 80 hotels, guest houses and B&Bs operating in the Oxford area. Again this list is not fully comprehensive but it could provide a useful starting point in the development of an accurate list.

Recommendation 1 – That the City Council should maintain an accurate list of guest houses operating in the Oxford area that is updated at least annually (The Human Exploitation Co-ordinator has produced a basic list which could be developed into an accurate list).

The case for a voluntary code of good practice

26. In discussions with professionals and guest house owners, the Review Group questioned whether the introduction of a code of good practice would be welcome and useful. Such a code would have to be introduced on a voluntary basis because the Council has no powers to require guest house owners to participate.
27. No one the Review Group spoke to objected outright to the introduction of a voluntary code of good practice. Amongst guest house owners, there was an acknowledgment of the problem and a willingness to co-operate. A police officer advised the Review Group that a code of good practice would complement other initiatives aimed at protecting vulnerable children and adults in guest houses.
28. In speaking with guest house owners and professionals, the Review Group has identified a number of good practices in guest houses but also some gaps, and became convinced that more could be done protect vulnerable people in guest houses. While recognising that it isn't possible to address everything and that devious people will find ways around the rules (perhaps by breaking guest houses into smaller units), the Review Group believes that a voluntary code of good practice would make a significant positive difference.
29. A voluntary code of good practice would provide assurance that guest house owners are committed to operating their guest houses in accordance with good practice that can help to deter, prevent and disrupt criminal activities in these premises. It would also make it easier for guest house owners to ensure that they are operating in accordance with good practice.
30. The Review Group suggest that a voluntary code of good practice should be introduced in consultation and partnership with other agencies including Thames Valley Police, the County Council (which includes Trading Standards and the Oxfordshire Fire and Rescue Service), District Councils that border the city, the hotel partnership and Experience Oxfordshire, a destination management company that is supported by the City and County Councils. Ideally a voluntary code of good practice would be jointly branded by all these organisations.
31. A voluntary code of good practice could also be linked in with the Say Something if you See Something campaign, which is designed to raise awareness of safeguarding issues amongst key organisations including taxi's, hotels and licensed premises.

Recommendation 2 – That the City Council should, in consultation and collaboration with other relevant statutory, commercial and voluntary agencies, lead on the introduction of a voluntary code of good practice for owners of guest houses in the Oxford area to sign up to. This code should be jointly branded and linked to existing initiatives such as the Say Something if you See Something campaign.

What a voluntary code of good practice should include

32. The Review Group has considered the merits of numerous suggestions as to what a voluntary code of good practice should include in order to promote and embed good safeguarding practices in local guest houses. A number of good practices have been identified for inclusion and the Review Group suggest that

these should be consulted on more widely once a voluntary code of good practice has been drafted.

33. The Review Group is mindful that many guest houses wish to provide a welcoming and homely environment for their guests and that the requirements of a code of good practice should be sensitive to this. The Review Group feels that practices that would be onerous, impractical, resource intensive or duplicate an existing requirement should be omitted. The Review Group also wants to ensure that suggested good practices are consistent with Thames Valley Police advice.
34. It was suggested to the Review Group that a voluntary code of good practice could be badged as a tourism mechanism that supports the marketing of guest houses to tourists as well as embedding good safeguarding practices in this sector. The Review Group notes that some guest houses largely cater for people coming to the city for work or those requiring temporary accommodation, and suggest that the emphasis of the code should be on community safety.

Signing up to a basic safeguarding policy statement

35. Guest houses are usually small, family-run businesses that are unlikely to have a written safeguarding policy. The Review Group suggest that, in signing up to a voluntary code of good practice, guest house owners could also sign up to a basic safeguarding policy statement. This statement could include an acknowledgement of the guest house owner's role in prioritising the safety and wellbeing of guests and vulnerable people, and their acceptance of the responsibility to take reasonable and appropriate steps to ensure their welfare.

Single point of contact

36. A police inspector informed the Review Group that guest house owners have little or no responsibility in law for sexual offences committed on their premises. The police advise hotels to identify a single point of contact for reporting suspicious activity to them. The Review Group suggest that guest house owners should provide a named single point with oversight of the running of the guest house and responsibility for ensuring that it complies with good practice. It is expected that the single point of contact would normally be the owner of the guest house or a manager appointed by them. This person should also be expected to notify the code administrator of any changes that affect compliance within 28 days.

Responsible person

37. As the single point of contact is unlikely to always be present and on duty at the guest house, the Review Group suggest that an identified 'responsible person' should be present at the guest house at all times during its hours of operation. While not responsible in law, this role could help to ensure compliance with good practice and report suspicious activities to the police in the absence of the single point of contact.

Basic Disclosure

38. There are currently no checks in place to ensure, as far as possible, that guest house owners are a 'fit and proper person'. Such checks are now built into the Council's taxi licensing application process. To provide transparency and assurance that guest house owners are a 'fit and proper person', the Review Group suggest that the single point of contact should be asked to produce a 'basic disclosure' certificate from Disclosure Scotland (they don't have to be from

Scotland to do this). The certificate currently costs £25 and it either contains information about every conviction, or states that there is no such conviction (it does not list any spent convictions). Should the single point of contact have one or more convictions, this should trigger a conversation and the nature of the conviction(s) should be taken into account. If serious concerns remained then a decision should be taken as to whether or not to exclude the guest house from the voluntary code of good practice. A similar approach should be taken if the single point of contact is unwilling to provide a basic disclosure certificate. The Review Group also suggest that the guest house owner should be encouraged to obtain basic disclosure certificates for all staff (including sub-contracted staff) who permanently or regularly work in the guest house.

Crime prevention advice

39. Thames Valley Police Crime Prevention and Reduction Advisers can offer free advice on how to prevent and reduce crime. To provide assurance that guest houses have adequate security measures in place, the Review Group suggest that it would be good practice for guest house owners to seek this advice every 3 years and implement recommendations. If a guest house was redeveloped or extended, the owner should also be signposted to advice on how to design out opportunities for people to commit crime.

Co-operating with the police

40. The police informed the Review Group that they have no rights to monitor closed circuit television (CCTV) in guest houses and limited powers to inspect premises. The Review Group suggest that, in signing up to a voluntary code of good practice, guest house owners should commit to co-operating with the police where suspicions or issues arise, including by allowing the police to freely enter the premises where illegal behaviour is suspected to be taking place and, where relevant, to access CCTV footage for up to 28 days. The Review Group understands that the voluntary searching of guest houses would need to take place within a guidance framework to ensure that any evidence uncovered could later be used in court. In return for making a commitment to co-operating with the police, guest house owners should be able to expect assistance from the police when reporting concerns (see recommendation 6).

Registering with Thames Valley Alert

41. In discussion with the Review Group, a guest house representative reported noticing a spate of requests for short notice cash bookings at around the time that the offences brought to light by Operation Bullfinch were taking place. This example underlines the need for information and intelligence sharing between guest houses and the police.
42. Thames Valley Alert aims to strengthen two-way information sharing between the police and the wider community and the Review Group suggest that guest house owners should register to receive messages of information, crime alerts and witness appeals relevant to their local area.
43. The hotel partnership is a sector-led initiative that provides a forum for owners and managers of hotels and guest houses to invite guest speakers and discuss a variety of issues of concern, including bilking (guests leaving without paying), as well as safeguarding. This scheme started in Cherwell as 'Hotel Watch' and participating guest houses convened a talk on child sexual exploitation in

February 2015. Hotel Watch is being rolled out across Oxfordshire in early 2016, probably under a different name. The Review Group suggest that it would be good practice for guest house owners to participate in this initiative.

Safeguarding training for all staff

44. Staff working in guest houses can be provided with basic training and advice to enable them to recognise types of behaviour that are potentially concerning. The Review Group acknowledges that running a guest house can be resource-intensive and that staff turnover can be high, so the training provided to staff should be proportionate to their type of work and level of responsibility.
45. End Child Protection and Trafficking (ECPAT) offer online recourses including an e-learning course to improve travel and hotel industry professionals' understanding of child protection issues. This has been endorsed by the Association of British Travel Agents. The Review Group suggest that a requirement of the code should be for all people identified as being a 'single point of contact' or 'responsible person' to complete this e-learning course. Training records should be retained, as these could be provided to demonstrate compliance with good practice.
46. Thames Valley Police has produced a Staff Guide for the hotel trade which lists types of behaviours that may be of concern, for example guests asking for a specific room number without knowing the name in which the room is booked, individuals who appear to be monitoring public areas, or guest rooms containing lots of condom wrappers or drug paraphernalia. This guidance also states that staff should be encouraged to make eye contact and engage guests in conversation to enquire as to the reason for guests stay or visit to the area. The Review Group suggest that this staff guide should be provided to all staff employed in guest houses, including any short term or sub-contracted employees.

Booking and checking in practices

47. Guest Houses are now required by law to provide name and address details of guests to the police upon request. However, the Review Group notes that guests are not required by law to provide proof of their identity when making a booking. In discussions with representatives of guest houses and statutory agencies, the Review Group has identified booking and checking in practices that can help to deter potential perpetrators.
48. A guest house representative advised the Review Group that they require card details to secure bookings even if the person making the booking wishes to pay in cash. The same guest house representative does not take online bookings, preferring to speak with potential guests in person or over the phone. These practices were not seen as onerous as they saved guest house staff no end of trouble. To help to ensure that guests are who they say they are the Review Group suggest that guest houses should have a 'no cash without ID' policy.
49. Other practices listed in police guidance include recording vehicle registration numbers and requiring visitors (if permitted) to register with reception. The Review Group suggest that these good practices should also feature in the code.

Holding master keys for all rooms

50. Holding and limiting access to master keys is considered to be good practice and many guest houses already do this. If suspicions were raised to the police that warranted the entry of a guest room, the identified responsible person could provide a master key to the police. The police guidance also states that guest rooms should be checked daily. The Review Group suggest that these practices should form part of the code of good practice.

Arrangements for monitoring premises

51. The police guidance advises hotel staff to look out for guests who move in and out of the premises at unusual hours and the Review Group was advised by a police inspector that the standard and control of night management in some guest houses is a particular concern. Some guest houses lock the main entrance at night and / or have an evening curfew. The Review Group heard that a guest house with multiple entrances has installed CCTV to provide external views of the building that can be monitored from the main desk or viewed later if required. The Review Group suggest that arrangements for monitoring premises should be appropriate to size and type of guest house and, as far as possible, consistent with advice provided by a Crime Prevention and Reduction Advisor. Where CCTV footage is recorded, this should be retained for up to 28 days.

Recommendation 3 – That, subject to further consultation, the voluntary code of good practice should commit owners of guest houses operating in Oxford to the following practices which would help to protect guest house owners and their businesses as well as guests and the wider community. These practices should extend to subcontractors working in guest houses where relevant:

- a) Signing up to a basic safeguarding policy statement;***
- b) Providing details of an identified 'single point of contact' who has oversight of the running of the guest house and is responsible for ensuring compliance with the code of good practice;***
- c) Having an identified responsible person on duty at the guest house at all times during its hours of operation;***
- d) Providing Basic Disclosure certificates for the single point of contact and responsible person(s) and if possible, obtaining certificates for all staff who permanently or regularly work in the guest house;***
- e) Having a free crime prevention check every 3 years and implementing recommendations made by the Crime Prevention and Reduction Advisor;***
- f) Cooperating with the police, including by providing available CCTV footage upon request and allowing the police to freely enter the premises where illegal behaviour is suspected to be taking place;***
- g) Registering with Thames Valley Alert and participating in the hotel partnership to strengthen two-way information sharing between guest houses and the authorities;***
- h) Retaining records of the single point of contact and responsible person(s) completing the ECPAT 'Every Child, Everywhere' e-learning course, and providing all staff working in the guest house with the Thames Valley Police Staff Guide for the hotel trade;***
- i) Having a 'no cash without ID' policy, recording vehicle registration numbers where relevant and requiring visitors to register with reception;***
- j) Holding and restricting access to master keys for all rooms and ensuring that guest rooms are checked daily;***

- k) Having suitable and proportionate arrangements in place for monitoring comings and goings at the premises, including during the night, and where relevant, retaining CCTV footage for a minimum of 28 days.***

Signing up to the code

52. The Review Group found that there was a willingness to cooperate with the authorities and embed good practices amongst representatives of guest houses. The Review Group suggest that guest house owners should be invited to self-certify that they comply with good practice on an annual basis. This process should be as straight-forward as possible and could be prompted by a letter signed by the Local Policing Area Commander. Take up could also be promoted through the hotel partnership and any other relevant channels.

Recommendation 4 – That the owners of guest houses in the Oxford area should be asked to self-certify that they comply with the voluntary code of good practice on an annual basis. This process could be prompted by a letter signed by the Local Policing Area Commander, as well as through the hotel partnership and any other relevant channels.

Additional support for guest houses

53. For a voluntary code of good practice to be seen as credible and successful, it would require the support of a significant proportion of local guest house owners, so participation should have clear benefits to them and to their business. A simple self-certification process would make it easier for guest house owners to ensure that they are doing what they can to embed good practices that can help to deter, prevent and disrupt criminal behaviour.

54. One guest house representative informed the Review Group that they were not clear what action they could take to deal with problematic guests. In addition, some guest house representatives said they had found the police to be dismissive or unhelpful when they had reported suspicions or issues. The Review Group suggest that signing up to a voluntary code of good practice should come with a commitment from the authorities to provide practical and constructive advice to guest house owners, and to take requests for assistance seriously.

Recommendation 5 – That guest house owners signed up to the code should be signposted to sources of advice and guidance.

Recommendation 6 – That the City Council asks Thames Valley Police to give prompt attention to requests for assistance at local guest houses.

Monitoring compliance

55. There would need to be a mechanism in place for picking up any concerns that guest houses covered by the voluntary code of good practice are not complying with one or more elements of it. The Review Group suggest that City Council services and partner agencies that inspect or receive complaints about guest houses should be asked to report any such concerns to the code administrator. The identified single point of contact should then be asked to demonstrate that they have addressed the reported concerns, either straight away or next time they self-certify, depending on the nature and seriousness of the reported issues. Where non-compliance is substantiated, guest house owners should be asked to take remedial action or risk being suspended from the code.

Recommendation 7 – That relevant agencies including City Council functions such as Environmental Health and Community Safety, and those provided by partner organisations such as the Thames Valley Police, Oxfordshire Fire and Rescue Service and Trading Standards, should be asked to report to the code administrator if they have reason to believe that, having been signed up to the voluntary code of good practice, the management of a guest house is non-compliant with it. The single point of contact should then be asked to demonstrate that they have addressed the concerns raised or risk being suspended from the code.

Resource implications

56. The introduction and administration of a voluntary code of good practice would have resource implications unless this work could be absorbed by existing officer capacity. The Review Group envisaged that resource would need to be identified to establish the voluntary code of good practice, and then to administer it over time. The initial work would involve compiling an accurate list of guest houses, drafting the code of good practice, producing materials and web content, promoting the code to guest houses and partner organisations, chasing and recording responses from guest houses, and sharing information about which guest houses are covered by the code with partner organisations.
57. Once established, the work involved in administering the code during the year would be significantly lower but an identified resource would still be required to maintain the accurate list of guest houses (at least annually), provide a point of contact for guest houses and the various agencies and record and follow up on instances of non-compliance. The workload would peak once a year when the code is renewed. The requirements of the code should be reviewed each year to ensure it remains consistent with good safeguarding practice before guest house owners are asked to self-certify. Consideration should be given to where these responsibilities should sit but the Review Group suggest that the Council's Human Exploitation Co-ordinator should have some oversight of this function.

Recommendation 8 – That the administration of the voluntary code of good practice should be adequately resourced. Consideration should be given to where in the organisation this responsibility should sit but the Human Exploitation Manager should have oversight of this administrative function.

Branding and promoting the code

58. A guest house representative advised the Review Group that they would not be willing to display a Say Something if you See Something campaign poster in their guest house because the image and message had negative connotations. The Review Group suggest that for the voluntary code of good practice to be visible to guests in an appropriate way, it should come with a recognisable logo that participating guest house owners could display on their website, and potentially on window stickers.
59. The public should be able to access information about the voluntary code of good practice. The Review Group suggest that a list of guest houses covered by the code should be provided on the Council's website, together with details of what practices these guest houses have signed up to. The City Council should also promote the introduction of the code through the local press, and specifically

targeting promotion at institutions and organisations that use or signpost visitors to accommodation, such as language schools.

60. A representative of Experience Oxfordshire advised the Review Group that their organisation would be supportive of the introduction of a voluntary code of good practice. The Review Group suggest that, to improve the visibility of the scheme to the public, Experience Oxfordshire should be asked to display the logo on their website next to participating guest houses. Experience Oxfordshire should also be informed when guest houses are no longer covered by the code so that the logo can be removed.

Recommendation 9 – That a suitable logo should be created for the voluntary code of good practice that could be displayed on guest house websites.

Recommendation 10 – That a list of guest houses covered by the voluntary code of good practice should be displayed on the City Council’s website together with details of what the owners of these guest houses have signed up to. The introduction of the code should also be promoted to targeted institutions, such as language schools, as well as more widely, including through a City Council press release.

Recommendation 11 – That Experience Oxfordshire should be informed which guest houses are covered by the voluntary code of good practice and asked to display the logo next to participating guest houses on their website.

Limitations of a voluntary code of good practice

61. Where guest house owners decline to sign up to the voluntary code of good practice, the management of these premises may be non-compliant with good practice. The Review Group envisaged recommending that this information, together with a range of other intelligence, could help to inform decisions about whether concerns around the management of premises should trigger a multi-agency intervention. Similarly, this information could usefully inform decisions made by local authorities about whether to place homeless and vulnerable people in need of temporary accommodation in particular guest houses.
62. The Review Group found that local authorities cannot legally operate arrangements that in effect amount to an ‘authorisation scheme’. Owners and operators of guest houses may be encouraged to subscribe to a voluntary code but should not be put under any pressure to do so by the authority. Guest house operators who chose not to subscribe must not be hindered by the authority in carrying on their business as a result of not subscribing. Any premises which does not subscribe, but which is otherwise legally compliant, should not suffer any detriment as a result or be treated less well than a premises which does subscribe. The Review Group suggest that the City Council should look for opportunities to lobby government for additional powers to require guest houses to embed good practices that can help to deter, prevent and disrupt criminal activities.
63. The Review Group noted that the hospitality sector was changing, with the advent of alternative means of booking accommodation, such as AirBNB, which would not be covered by a voluntary code of good practice aimed at guest houses.

Other suggestions for strengthening safeguarding in the hospitality sector

64. During the course of its evidence gathering the Review Group identified some additional suggestions (beyond the scope of this review) as to how the City Council could contribute to protecting vulnerable people within the broader hospitality sector.
65. A code of practice already exists for international organisations in the hospitality sector to sign up to with respect to combatting commercial CSE; the Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism. The Review Group suggest that the City Council should encourage the city's larger hotels and tour operators to sign up to this code of conduct.
66. The Review Group was advised that the City Council could do more to promote the importance of safeguarding to organisations such as Experience Oxfordshire and the local Chamber of Commerce. The Review Group suggest that the Council should utilise existing high-level relationships in asking these organisations to do more to support the Say Something if you See Something campaign.
67. The majority of guest houses and hotels in Oxford are listed on travel websites such as Trip Advisor and Bookings.com, and many have been awarded star ratings by Visit England or the AA. Over the longer term there could be an opportunity for such organisations to do more to promote good safeguarding practices within the hospitality sector. The Review Group suggest that the City Council should look for opportunities to join with partners, perhaps through the National Working Group, to lobby government to press these organisations to play a greater role in promoting good safeguarding practices.
68. Council officers advised the Review Group that there is a need for a public awareness campaign that empowers people to come forward with concerns. The Review Group suggest that government should be asked to do more in this regard too.

Recommendation 12 – That the City Council should encourage the larger tour operators and hotels operating in Oxford to sign up to the Code of Conduct for the Protection of Children from Sexual Exploitation in Travel and Tourism.

Recommendation 13 – That the City Council should ask organisations such as Experience Oxfordshire and the local Chamber of Commerce to do more to promote the Say Something if you See Something campaign, including through existing relationships.

Recommendation 14 – That the City Council should look for opportunities to join with partners, perhaps through the National Working Group, in pressing government to:

- a) Grant additional powers to local authorities to require the embedding of good practices in guest houses,***
- b) Do more to involve the hotel accreditation agencies and major travel website companies, as well as guest houses, in efforts to promote good safeguarding practices in the hospitality sector;***
- c) Introduce a public awareness campaign that empowers people to come forward with safeguarding concerns.***

Conclusion

69. The Review Group has found that there is a strong case for the introduction of a voluntary code of good practice for guest house owners to sign up to that promotes and embeds good safeguarding practices that can deter, prevent and disrupt criminal activities. The Review Group has exceeded its original brief by suggesting details of good practices that should be included in the code and of how the code should operate in practice, as well as by providing additional suggestions relating to the wider hospitality sector.
70. The Review Group is conscious that the City Executive Board will be asked to consider these recommendations at a time when Council resources are constrained. However, it should be emphasised that the protection of vulnerable children and adults in guest houses is an important issue, particularly given the extraordinary crimes that have taken place in Oxford over recent years, and that a more progressive approach needs to be taken to preventing these criminal activities from being repeated in future. Where the detail of these recommendations is not agreed, the Review Group would welcome alternative proposals that can achieve the same objectives.

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