CARDIFF INSTITUTE OF HIGHER EDUCATION RESEARCH
DIPLOMA

FACULTY OF TOURISM HOSPITALITY AND FOOD

THE IMPACT OF NEW FOOD LEGISLATION ON THE
HOTEL INDUSTRY
IN
SOUTH GLAMORGAN

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This document is the written report on a survey into the effect new food legislation has had on the hotel sector of the catering industry in Cardiff and South Glamorgan. Information was gathered by way of structured interviews with management personnel in twenty hotels of varying sizes.

The Food Safety Act 1990 (and consequently the Food Hygiene (Amendment) Regulations) were introduced in January 1991 in order to strengthen and update food safety legislation.

Awareness of the new legislation was found to be lacking and there was confusion between the requirements of the Act and the Regulations. Approaches to Food Safety and Quality Control procedures (in relation to food) were mixed, ranging from very thorough procedures in some hotels to very poor approaches in others.

The aims of the Act, the main offences, enforcement procedures and the penalties that may be incurred proved to be areas where a purely superficial knowledge if any, was evident. Food storage and temperature controls were also areas where confusion and a lack of awareness was displayed.
Recommendations are made including the need for further research concentrating on the Quality Assurance procedures in hotels, especially in the Food and Beverage departments.
ACKNOWLEDGEMENTS

The author wishes to acknowledge the help and support given by the following people and organisations prior to, and during the investigation:

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Dr. L Hart
All the hotel proprietors and managers who participated in the survey
Cardiff Environmental Health Department
Cardiff Marketing Bureau
The Ministry of Agriculture, Fisheries and Food
The Department of Health
The Welsh Office
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1. Foodborne disease surveillance in England and Wales: 1985
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CHAPTER ONE

INTRODUCTION

1.1 BACKGROUND

How safe is our food? - A question that is being asked with increasing frequency in today's society. The whole area of food safety has become a subject of major concern, not just to people working in food related industries, but to the general public at large. Little is more personal than that which we eat and yet our food has become a major item for discussion and debate.

Food poisoning and the concomitant increased attention paid to food safety by the media have made the public more aware of what they eat and drink and better informed about the dangers of inadequate hygiene.

The danger from badly produced, stored, prepared or cooked food is not something new. The hazards of food poisoning have been recognised since the earliest times, and the benefits of introducing legislation to try and prevent it is also centuries old.

The laws of the ancient Israelites contained detailed information on foods to be avoided as well as on methods of preparation and the importance of personal hygiene, and still exist today in traditional Jewish
cuisine. Around 2000 BC, the book of Leviticus records that Moses introduced laws to protect his people against infectious diseases:

"hands are to be washed after killing sacrificial animals and before eating"

Also, certain animals, birds, fish and flying insects were forbidden because of their possible harmful effects on the human body (1).

In this country, one of the earliest food legislation items was an Act passed in 1266. Unfortunately, largely due to the lack of monitoring and enforcement agencies, it was as ineffective as many other statutes of that time related to food. Food quality was questionable to say the least, even though it was the duty of the various Guilds to maintain the purity of the commodities with which their members dealt. For example, used tea leaves (or any other leaves!) were added to tea which was then glazed with black lead before being sold. Coffee too, was equally badly adulterated. In more recent times, widespread publicity created public pressure on the authorities leading to the formation of a Select Committee in 1855 to deal with the Adulteration of Food. This led to the
introduction of the first Adulteration of Food and Drink Act of 1860 (2).

As society has become more aware of the possible dangers associated with food and its preparation and production, legislation has constantly been amended in attempts to maintain safe standards. Our present legislation is based on the 1875 Sale of Food and Drugs Act and it was in that Act that the following provision first appeared:

"No person shall sell to the prejudice of the purchaser any article of food or anything which is not of the nature, substance or quality demanded by such purchaser" (2)

1.2 FOOD CONSUMPTION AND FOOD POISONING

Food consumption has changed dramatically as society has developed and become more "civilized". The factors that affect when and what people eat are diverse and varied. For example, as a result of the daily routine that many of us find ourselves in, we often eat "by the clock", instead of when we are hungry. Also, an increase in relative affluence has contributed to what we eat, and where we eat it. The types of cuisine now available are not only more varied but also more accessible to the "man in the street".
According to a Ministry of Agriculture Fisheries and Food (MAFF) survey (1988), half of all adults eat in restaurants at least four times a year, and more than a quarter do so at least once a month. Also, reported outbreaks of cases of food poisoning are frequently as a result of eating meals in catering outlets, particularly at restaurants and receptions, as well as in hospitals. In 1985 for example, 100 out of 463 outbreaks reported by Laboratories, Medical Officers of Environmental Health (MOsEH) and Environmental Health Officers (EHOs) were in restaurants or hospitals (see appendix 1)

Also, as time has passed, the variety of foods available has greatly expanded, and the circumstances in which food is eaten has widened and increased. For example:

* more foods are being imported including many exotic varieties

* More types of foods are available to the public

* married women are working more and more with less time being spent at home
more people are "eating out" - their financial circumstances enabling them to do so. There are more outlets and people have more leisure time available to undertake social activities.

as well as eating in restaurants and hotels, food is also provided in schools, colleges, canteens, hospitals, residential homes and other institutions.

The world has become "smaller" in the sense that more people are travelling, especially abroad.

The postal service is often used for delivering food (e.g. smoked fish).

More advanced forms of manufacturing and processing are being used

Equipment is constantly changing and being modified

Alongside these events, the number of reported cases of food poisoning has increased dramatically, especially in recent years. (See tables 1 and 2 below):
### Table 1

**Food Poisoning cases reported in England and Wales, 1982-90**

<table>
<thead>
<tr>
<th>Year</th>
<th>Number of cases *</th>
</tr>
</thead>
<tbody>
<tr>
<td>1982</td>
<td>14253</td>
</tr>
<tr>
<td>1983</td>
<td>17735</td>
</tr>
<tr>
<td>1984</td>
<td>20702</td>
</tr>
<tr>
<td>1985</td>
<td>19242</td>
</tr>
<tr>
<td>1986</td>
<td>23948</td>
</tr>
<tr>
<td>1987</td>
<td>29331</td>
</tr>
<tr>
<td>1988</td>
<td>39713</td>
</tr>
<tr>
<td>1989</td>
<td>52557</td>
</tr>
<tr>
<td>1990</td>
<td>54119 **</td>
</tr>
</tbody>
</table>

* Cases of food poisoning formally notified to the Office of Population Censuses and Surveys and otherwise ascertained.

** Provisional

These statistics are available because all known incidences of food poisoning must be reported to the local Environmental Health Authorities. As can be seen from the above extract, the number of cases of food poisoning has nearly doubled over the past four years to more than 54000 cases in 1990 and 1991 is likely to
produce similar or higher figures. Food poisoning, especially salmonellosis causes approximately 40 deaths a year. (4)

They clearly show a rapid increase in the number of reported cases of food poisoning.

Table 2

**Reported cases of food poisoning in England and Wales by Regional Health Authority (*)**

<table>
<thead>
<tr>
<th>Region</th>
<th>1982</th>
<th>1990</th>
<th>INCREASE %</th>
</tr>
</thead>
<tbody>
<tr>
<td>Northern</td>
<td>611</td>
<td>4108</td>
<td>572</td>
</tr>
<tr>
<td>Trend</td>
<td>918</td>
<td>5424</td>
<td>491</td>
</tr>
<tr>
<td>South Western</td>
<td>689</td>
<td>3912</td>
<td>468</td>
</tr>
<tr>
<td><strong>Wales</strong></td>
<td><strong>666</strong></td>
<td><strong>3076</strong></td>
<td><strong>362</strong></td>
</tr>
<tr>
<td>SE Thames</td>
<td>755</td>
<td>3402</td>
<td>351</td>
</tr>
</tbody>
</table>

These figures are set against an overall increase for England and Wales of 290% (i.e. 1982 - 14243, 1990 - 55535)
* based on mid-1989 population estimates
** includes both cases formally notified and those ascertained by other means.

(Source: Department of Health)
Wales is among the five Health Authority Regions with the highest increases in incidences of food poisoning cases per 100,000 of the population (over the period 1982 to 1990), see Table 2 above:
The media have seen this increase in Food Poisoning as newsworthy and incidences of food borne diseases are attracting more publicity. Increased incidences of Salmonella based illness and Listeriosis among others, have made the public more aware of the dangers and the need for change. Individuals such as Edwina Currie may have upset many people, but they have helped to elevate the whole issue to it's present position of prominence, and to arouse awareness.

1.3 THE NEED FOR CHANGE

For some time personnel within the Food and Catering Industries have felt the need for change to the legislation because of the inadequate hygiene levels in some establishments. One Director of a major food supplying company recalled:

"I came away with an overriding impression of horror in some cases. I would not want to eat in the premises where I had witnessed quite appalling kitchens and dreadful conditions under which food was handled" (5)
It should be made clear at this point that such conditions are not typical of the industry. However, it does indicate that there is a need for improvement, together with the need for practical, enforceable legislation.

1.4 THE NEW LEGISLATION

It was against this background of rising awareness and concern, more reported cases of food poisoning, and growing media attention that in 1989 the Government published the very important White Paper, Food Safety - Protecting the Consumer. The Food Safety Act 1990 soon followed and subsequently, the Food Hygiene (Amendment) Regulations 1990 were introduced. As with other Regulations, these are the statutory instruments that enable the relevant Minister to change or alter the requirements without going back to Parliament. The Act received Royal Assent on 29th June 1990 and most of it became operational on 1st January 1991. It was described by the Government of the time as:

"A wide ranging law, devised to strengthen and update the law on food safety and consumer protection in the food sector throughout Great Britain." (6)
It must also be remembered that the food industry is of considerable economic importance to the wealth of the Nation. This new Act, which is very wide ranging has been designed to strengthen and update previous legislation, as well to introduce new elements of responsibility in it's own right (i.e. the defence of "due diligence").

Although the Department of Health has issued guidelines on the interpretation of the Act, they concentrate mainly on transportation and retail sale and lack focus on the catering industry. Those in existence are either insufficient or confusing for the caterer.

One of the most important concepts of the new Act is that of "due diligence" (now the main defence that may be offered if prosecuted and contained within section 21 of the Act), and the fact that the caterers' responsibility starts from the moment products are accepted into their organization. This is a major change from the previous legislation and one which all caterers must become familiar with.
It is as a result of these changes and debate, as well as the wide ranging and quite radical nature of the Food Safety Act itself that this survey was initiated.
1.5 AIMS OF THE INVESTIGATION

1. To assess the level of knowledge of hoteliers regarding new food legislation.

2. To determine the accuracy of this knowledge.

3. To establish whether hoteliers are confused by, or misunderstand specific areas in the new food legislation.

4. To identify sources of information regarding new legislation available to, and used by, hoteliers.

5. To assess levels of support concerning the legislation available to hoteliers and managers in small, medium and large hotels.

6. To establish any actions taken by hoteliers in response to the new legislation.

7. To identify areas of training that have become necessary, as a result of the new legislation.

8. To recommend, if necessary, strategies that will help to increase awareness and knowledge of the new Act.
CHAPTER TWO
METHODS AND MATERIALS

2.1 SCOPE OF THE INVESTIGATION

Because of time and resource constraints, it was decided to limit the survey to Cardiff and the rest of South Glamorgan. This had the added advantage of providing local information and could act as a basis for possible further extension to a wider area.

Cardiff, as a capital city, has a great diversity of food premises (2451 in the year 1989/90). (7) There are many hotels, restaurants, street traders, clubs, and take away establishments. Also, whilst there are many hotels which are well established, there are a growing number opening up as the city expands. In the year 1989/90 there were 335 food complaints in Cardiff and 1772 visits to food premises made by the personnel of the Environmental Services, 527 cases of food poisoning were recorded, and 8 prosecutions (resulting in 8 convictions) were made, leading to fines of £4500. (8)

For the purposes of this survey, it was decided to confine the survey to the hotel sector of the industry, as it was felt that the results obtained could
possibly form the basis for targeted advice regarding the new legislation.

At the outset of the Investigation, the City Environmental Health Department was approached and notified of the impending survey. Discussion took place with one of the Environmental Health Officers so that the general view of the EHOs regarding the new legislation could be ascertained. Initially at least, their role might be seen as being very much an advisory one as well as that of enforcement. The All-Wales Chief Environmental Health Officer's Panel was also notified (see letter at appendix 2).

Because of the diversity of establishments under the general umbrella name of hotels, i.e. hotels, guest houses, and "bed and breakfast", it was necessary to define the term "hotel" and to set some ground rules for the type and size of establishment visited.
According to the Hotel Proprietors Act 1956, a hotel is:

"an establishment held out by the proprietor as offering food, drink and, if so required, sleeping accommodation, without special contract, to any traveller presenting himself who appears able and willing to pay a reasonable sum for the services and facilities provided and who is in a fit state to be received"

(see appendix 3)

There are numerous establishments of varying sizes in Cardiff and South Glamorgan offering these services, ranging from two to three bedroom bed and breakfast houses to multi-bedroom city hotels. For the purposes of the survey, establishments of ten bedrooms and above were selected. This decision was taken with the knowledge that another similar survey was being instigated by the Cardiff Institute of Higher Education Food Hygiene Unit. Small guest houses and possibly bed and breakfast establishments were to be considered as part of that investigation.
2.2 STRUCTURE OF THE INVESTIGATION

To achieve the aims of the survey, it was decided to use a structured interview format, and that interviews be arranged (initially by telephone) with suitable management personnel from selected hotels in Cardiff and the rest of South Glamorgan. From past experience, a postal questionnaire was discounted as being too unreliable, providing insufficient information for the needs of the survey, and lacking the personal contact necessary for obtaining in-depth information. It was also felt that the generally low response rates from this method could further detract from the validity of the survey.

The use of the structured interview technique allowed scope for more detailed questioning and discussion in order to pursue or clarify specific areas where it is felt necessary to do so. Also, the additional time spent conducting the interviews would provide better quality, and more valid information for discussion and analysis.

A structured interview was designed and administered as a pilot programme at four hotels in and around Cardiff. Contact was initially made by telephone and appointments were made with the prospective interviewee (this procedure applied to the main investigation
also). Appropriate amendments were made based on the results of the pilot survey resulting in the interview format used for the rest of the survey itself (see appendix 4). Amendments made as a result of the pilot programme were not extensive and centred around questions which were already partly answered elsewhere in the interview, or were not felt to be appropriate.

It was the original intention that the interviews should be sound recorded in order to retain as much of the information as possible. However, the interviewees in the pilot programme were unwilling for this to take place. As a result, no further sound recording of interviews was considered.
2.3 SUBJECT AREAS

The questions in the structured interview were arranged in six subject areas (as follows) and were designed to elicit as much information as possible about the knowledge, attitudes and understanding of the interviewees towards the new legislation.

* Introductory and general questions about the Act and the Regulations

This section contained questions 1 to 18 and was mainly concerned with general knowledge of the Food Safety Act 1990.

* Enforcement

This section contained questions 19 to 29 and concentrated on the role of the Environmental health Officer and the procedures to be followed during and after inspections.

* Defences

This section contained questions 30 to 32 and was concerned with the defence of due diligence.

* Penalties

Questions 33 and 34 were in this section and dealt with the penalties that could be imposed by the courts if convicted of an offence or offences.
Further questions about the Food Hygiene (Amendment) Regulations 1991

This section contained questions 35 to 48. Specific questions relating to temperature controls, equipment and food storage were asked in this section.

Training

Questions 49 to 69 were contained in this section and they were concerned with staff training, levels of qualifications held and training bodies offering food safety and hygiene training.

2.4 THE INTERVIEWS

Questions were presented to the interviewees, their answers were recorded on the question sheet and discussed where appropriate. During all interviews, great care was taken not to influence in any way the replies given. Interviewees were not provided with copies of the interview questions in advance as it was felt that this may have encouraged some prior research into the legislation in order to answer some of the questions "correctly" and affect the validity of the information.
Careful consideration was given to the people who should be interviewed. In order to satisfy aims 1 to 7 of the survey, it was decided that a member of the management team, or the proprietor (where applicable) would be more suitable than section heads or supervisors. This was based upon the fact that managers have responsibilities across the whole hotel and are also responsible for implementing training procedures in all areas, whereas section heads are only responsible for their own area. It was further decided that the Personnel Manager would be the person most able to fulfil the needs of the survey. Their close contact with the hotel staff as well as their general hotel responsibilities, plus the fact that they are often also directly responsible for staff training suggested that they would be the most suitable interviewees.

Because the staff and management structures of hotels vary a great deal according to size and type of establishment, it was not always possible to define a specific Personnel Manager. Where this was the case, the General Manager, Assistant Manager or the Food and Beverage Manager was interviewed, it was felt that this approach would provide some consistency of responses. Although time was always at a premium, every person interviewed proved to be very helpful.
It was decided to limit the number of interviews to a maximum of twenty-five. This figure represents approximately 33% of the hotels and guest houses contained in the 1990/91 Cardiff Tourism Accommodation Guide as available at the time of planning the survey. (see appendix 5).

Whilst there could be many other "hotel" establishments in South Glamorgan not contained in this guide, it was seen as being a convenient starting point, and a readily accessible formal list of varied sized establishments "registered" with the Cardiff City Marketing Bureau Ltd.
3.1 INTRODUCTION

At the conclusion of the survey, the representatives of thirty-one hotels had been approached by the author (this included the pilot interviews). Twenty one consented to be interviewed and one agreed to participate provided that the questionnaire be administered via the postal system. Nine declined to participate in the survey. These were mainly small privately owned hotels. The postal questionnaire was not returned and one interview was abandoned. One interviewee represented two establishments. This survey is therefore based on twenty interviews (see tables 3, 4, and 5). In one establishment two interviewees were present because of the level of importance they attached to the survey.
Table 3

PEOPLE INTERVIEWED REPRESENTED THE FOLLOWING AREAS

<table>
<thead>
<tr>
<th>People Represented</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Proprietors</td>
<td>3</td>
</tr>
<tr>
<td>General Managers</td>
<td>7</td>
</tr>
<tr>
<td>Personnel/Training Managers</td>
<td>7</td>
</tr>
<tr>
<td>Food and Beverage Managers</td>
<td>2</td>
</tr>
<tr>
<td>Banqueting Managers</td>
<td>1</td>
</tr>
<tr>
<td><strong>Total number of interviews</strong></td>
<td><strong>20</strong></td>
</tr>
</tbody>
</table>

The hotels visited were of varying types and sizes as shown below in tables 4 and 5:

Table 4

TYPES OF HOTELS VISITED

<table>
<thead>
<tr>
<th>Type of Hotels</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Country hotels/clubs</td>
<td>3</td>
</tr>
<tr>
<td>City/Town hotels (Company owned)</td>
<td>10</td>
</tr>
<tr>
<td>City/Town hotels (Privately owned)</td>
<td>6</td>
</tr>
<tr>
<td>Country/Conference hotels</td>
<td>1</td>
</tr>
<tr>
<td><strong>Total number of hotels</strong></td>
<td><strong>20</strong></td>
</tr>
</tbody>
</table>
Table 5

SIZE OF HOTELS VISITED (according to the number of bedrooms)

<table>
<thead>
<tr>
<th>Size of Hotels</th>
<th>Number of Hotels</th>
</tr>
</thead>
<tbody>
<tr>
<td>under 20 bedrooms</td>
<td>4</td>
</tr>
<tr>
<td>21 to 50 bedrooms</td>
<td>5</td>
</tr>
<tr>
<td>51 to 100 bedrooms</td>
<td>4</td>
</tr>
<tr>
<td>101 to 150 bedrooms</td>
<td>5</td>
</tr>
<tr>
<td>above 150 bedrooms</td>
<td>2</td>
</tr>
<tr>
<td>Total number of hotels</td>
<td>20</td>
</tr>
</tbody>
</table>

All interviews were carried out in an informal atmosphere and in most cases, generated discussion. Interviews varied in duration from twenty minutes to two and a half hours. Everyone interviewed proved to be helpful, and interested in the subject of food safety. Not all interviews were interruption free and many of the interviewees were "on call".

One interviewee was repeatedly interrupted and eventually required elsewhere, with the result that the final stages of the interview were extremely rushed.
The findings of this survey follow and are listed according to the topic areas stated previously in paragraph 2.3. Some areas are sub-divided where appropriate.

3.2 RESPONSES TO QUESTIONS

* Questions 1 to 18 (Introductory and General questions about the Act and the Regulations)

This area may be sub-divided as follows:-

3.2.1. Introductory knowledge of the Act
3.2.2. Registration of Premises
3.2.3. Purchasing, deliveries and acceptance of commodities
3.2.4. Changes as a result of the Legislation

3.2.1 Introductory knowledge of the Act

All the interviews commenced with the interviewer stating that new Legislation had been introduced at the beginning of 1991. The participants were asked if they knew what this included. Six were able to state the name of the Act with a further four able to quote part of the name. A lesser number {five} were aware of the name of the new Regulations with two being able to quote part of the name.
Seventeen people said that they had read either the Act and/or Regulations, or information leaflets/brochures about them and also possessed either copies of the Legislation or other information. Of these, ten did not know where they were obtained from. Four were in the form of directives or information from their Head Office. One was obtained from the local Environmental Health Office and the other two were obtained from Croner Publications Limited. Initially, 65% of the interviewees (thirteen) stated that the Legislation was easy to understand. When further questioned however, nine thought there were elements of it which were confusing. Of these, the two most commonly stated were regarding the food storage and holding temperatures, and the amount of jargon or "legalese" contained in the literature. Various individual comments regarding the Act were also made including the following:

"vague in places"
"information too deep"
"penalties - What can they do to me?"
"due diligence - Is it a cop-out?"

Two people were quite happy with the way in which the Legislation was written, with comments such as:
"easier to understand as time goes by"
"written in layman's terms, - it's OK"

One small hotel proprietor stated that although there was no confusion, there was some "stupidity" in the requirements.

When asked to explain the main aims of the Act, all the participants attempted to state them as best they could. The most common reply given (six) was to increase awareness of food safety within the catering industry. Five of these also regarded the promotion of the due diligence defence as being an aim of the Act. These responses as well as others made, can be seen below in table 6:
Table 6

PERCEIVED AIMS OF THE FOOD SAFETY ACT 1990

<table>
<thead>
<tr>
<th>Aim</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>to increase food safety awareness</td>
<td>6</td>
</tr>
<tr>
<td>to promote due diligence</td>
<td>5</td>
</tr>
<tr>
<td>to provide better safety to customers</td>
<td>4</td>
</tr>
<tr>
<td>to tighten up standards</td>
<td>3</td>
</tr>
<tr>
<td>to ensure food safety</td>
<td>2</td>
</tr>
<tr>
<td>to prevent food poisoning</td>
<td>2</td>
</tr>
<tr>
<td>to control food handling premises</td>
<td>2</td>
</tr>
<tr>
<td>to clear up the odd few practices</td>
<td>1</td>
</tr>
<tr>
<td>to strengthen the powers of the EHO</td>
<td>1</td>
</tr>
<tr>
<td>to increase the standards of the smaller establishments and take-aways</td>
<td>1</td>
</tr>
<tr>
<td>to provide a safe product</td>
<td>1</td>
</tr>
<tr>
<td>to confuse the caterer</td>
<td>1</td>
</tr>
</tbody>
</table>
Similarly, a question was asked about the four main offences under the Food Safety Act. Sixteen participants did not know what they were, three were able to quote them with a high degree of accuracy and one replied that although they weren't known, they would be recognised if seen!

A multi-choice question was asked regarding the severity of the Act. The responses are shown below in table 7:

Table 7
RESPONSES RELATING TO THE SEVERITY OF THE NEW ACT

<p>| | |</p>
<table>
<thead>
<tr>
<th></th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>too lenient</td>
<td>5</td>
</tr>
<tr>
<td>about right</td>
<td>11</td>
</tr>
<tr>
<td>too severe</td>
<td>1</td>
</tr>
<tr>
<td>not known/no comment</td>
<td>1</td>
</tr>
</tbody>
</table>
Two other replies were non-committal and made in the form of comments including:

"depends on the size and type of establishment"

"OK providing there are enough EHOs to cover it"

"OK in parts, too lenient in others, i.e. food storage temperatures and hotel sector regulations"
3.2.2. Registration of Premises

Questions were asked regarding the registration of individual premises and the replies are shown below in table 8:

Table 8
REGISTRATION OF PREMISES

<table>
<thead>
<tr>
<th>Have you registered your business?</th>
<th>Yes</th>
<th>11</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>No</td>
<td>3</td>
</tr>
<tr>
<td>Not known</td>
<td></td>
<td>6</td>
</tr>
</tbody>
</table>

The three negative, and six unknown replies were given during interviews which took place prior to the registration date [3rd April 1992 for existing businesses], and they should now be registered as a result of the dissemination of application forms by Cardiff Environmental Services.

Of the eleven positive responses, nine interviewees stated that they had registered with the local authority, one through their Head Office, and one did not know who the establishment had been registered
with. Nine did not know when their businesses had been registered, one was able to quote the precise date and the remaining replies were very vague including:

"this year"
"Christmas time"

A question regarding the deadline for registration was included in the interview questionnaire, although there was confusion as to when this would actually be. Predictably, seventeen interviewees did not know when the deadline was/would be (depending on the date of their interview). The remaining three quoted three separate months - "March", "April" and "September".

Representatives were also asked if they knew that it is/would be a criminal offence to operate after the registration date if their business was not registered. Replies were evenly divided with ten saying yes they knew, and ten saying no they did not.

3.2.3. Purchasing, deliveries and acceptance of commodities

The new Legislation has changed considerably regarding the responsibility of the caterer in relation to purchasing and accepting foodstuffs. When asked who was considered to be the "purchaser" according to the Act,
nineteen replies related to members of the hotel management or staff. The Head Chef, Bars manager and Catering Manager were the most frequent replies. In smaller hotels, the owner/proprietor was seen as being the purchaser. Two interviewees stated that their guests were also purchasers.

When asked specifically about the purchasing and acceptance of foodstuffs, a very wide ranging set of replies was received. Thirteen interviewees were not aware of any changes regarding the purchasing aspect and two did not know what changes had been made relating to the acceptance of foods. The comments that were made about purchasing and accepting were very similar. The cleanliness, suitability and correct temperature of the insides of delivery vehicles was generally well known. Other individual replies included the following:

"more control and spot checks"
"all temperatures checked before accepting"
"standards must be more rigid"
"suppliers must conform to the Regulations"
"frozen foods must be in sealed bags"
Participants were also asked about food and food handlers in this section. When asked what the Act meant by "food", eighteen responses related to everything eaten, fifteen of these also included drink/liquor in their definition. One also stated drugs as being food but did not elaborate on this. One interviewee further quantified the reply by stating that food was:

"anything perishable - liable to bacterial contamination (including drink)"

Ten participants thought that all their management and staff were "food handlers", (although six did not mention, or did not consider that, accommodation staff could also be in this category). The other half of the replies were restricted to the catering section or those directly in contact with food, i.e. chefs, waiters, kitchen assistants, catering managers.
3.2.4. Changes as a result of the Legislation

Participants were asked if any changes had been made in response to the Legislation, and whether any changes were planned for the future. Six stated that no changes had taken place and fourteen described a wide ranging variety of changes. Comments relating to refrigerators were the most commonly stated (eight) with individual replies including:

"new 'fridges, and temperatures monitored"
"more temperature control of 'fridges"
"fridges and freezers adapted"
"fridges updated"

Other individual comments included:

"sweet trolley not used any more, food samples taken for parties over twenty"

"more care with storage of food, and coloured boards purchased"

"desserts left out for the minimum time"
"more staff training, spot checks on deliveries, stock rotation!"
Where participants had stated that no changes had taken place, it emerged through discussion that in many cases, changes had been made prior to the introduction of the new Act anyway.

Future changes (both short term and long term) also included alterations to, or improvements to, refrigerators and storage facilities in order to improve temperature control. Staff training was also mentioned. One interviewee stated that all buffet displays would be discontinued.

Questions were also asked regarding the general effect that the legislation had on the participants and their establishments. Three people stated that their own approach had not changed, but this was because they already placed a lot of emphasis on food safety. Three others said that there had been no noticeable effects on them or their business. Thirteen interviewees were personally more aware of the dangers associated with handling foodstuffs and with food safety in general. Comments made about the establishments were very similar to those made in response to previous questions. Apart from the fact that staff and management were becoming more aware, increased administration and costs were also mentioned.
3.3. Questions 19 to 29 (Enforcement)

This area may be sub-divided as follows:

3.3.1. Visits/Inspections by Environmental Health Officers
3.3.2. Notices and Orders

3.3.1. Visits/Inspections by Environmental Health Officers

Sixteen interviewees stated that the local authority was responsible for enforcing the new Legislation and two others just said "the Government". Two did not know who was responsible. When asked about the powers of an Environmental Health Officer, replies were very mixed. Nine people stated that he/she could visit the premises at any time they wished, and five said that they could only visit at a reasonable time. Seven also indicated that they could inspect anything and go anywhere they wished in the establishment. Further replies included the following:

"they can close you down immediately"
"they can caution you"
"they can take you to court"
"they can make you change things"
"they can take food samples"
Interviewees were also questioned about the consequences of finding suspect food, or finding that the premises were unsatisfactory for food storage, preparation, cooking and service. Replies were again very mixed. In each case four were not able to state the consequences or procedure. In the case of suspect food, improvement notices were mentioned by five people. They were mentioned nine times for unsatisfactory premises. In both cases, four participants stated that a closure notice would be issued, and three were either very vague or did not know what would happen. The remaining replies were similar to those in the previous question area and included:

"would take you to court"
"would take evidence"
"would make recommendations"

In at least one of the hotels, the company head office would also analyse any suspect food as well as monitor the route followed once the food sample had been removed from the establishment.
Twelve participants stated that they had been visited by an Environmental Health Officer since the introduction of the new Legislation. The number of visits ranged from once to "several times" with one response indicating a visit every month. Replies concerning the frequency of visits were mixed and are summarised below:

<table>
<thead>
<tr>
<th>Frequency of Visits</th>
<th>Number</th>
</tr>
</thead>
<tbody>
<tr>
<td>Once every few weeks</td>
<td>4</td>
</tr>
<tr>
<td>Once / twice a year</td>
<td>8</td>
</tr>
<tr>
<td>Less than once every two/three year</td>
<td>8</td>
</tr>
</tbody>
</table>

In six cases it was stated that the visits were carried out in a more thorough manner than when they had been visited before January 1991 although only one person detected any difference in the attitude or approach of the Officer. One response indicated that it did not matter how many changes there were to the law:

"EHOs have their own pet hates, some are friendly, some are bombastic".
Three people found the visits carried out without any detectable differences at all.

Of those hotels visited or inspected since January 1991, one was issued with an improvement notice and the remainder were told (or advised) to make some changes. One of these had sixteen points under the Regulations to "get right".
3.3.2. Notices and Orders

This section contained questions relating to:

Improvement notices
Prohibition orders
Emergency prohibition notices
Emergency prohibition orders

Thirteen participants were not aware of the differences between them. Five had a little knowledge of Improvement notices and Prohibition orders and two had some idea of the first three. Thirteen did not know the consequences of a Prohibition order being imposed upon them. Four stated that they would be unable to trade and one stated that the hotel would be closed until the "fault" was rectified.

The remaining two replies were as follows:

"would be a heavy fine - a catastrophe"
"lots of financial harm"
3.4. * Questions 30 to 32 (Defences)

This section was concerned with the defence of due diligence, i.e. "taking all reasonable precautions and exercising all due diligence to avoid committing an offence".

Six interviewees knew that the defence which may be offered had changed to that of due diligence. Two stated that "all reasonable precautions or proper procedures must be carried out". Twelve did not know what defences may be offered. One of these stated that there should not be a defence at all. When asked to explain the meaning of due diligence, three interviewees were able to do so with some degree of accuracy, four were able to discuss the taking of all reasonable or necessary precautions and ten were either very vague or could not explain the defence at all. Fifteen replies showed that there was knowledge of the existence of an appeal procedure which could be followed if prosecuted under either the Act or the Regulations. None were able to discuss or explain this procedure.
The Food Safety Act 1991 considerably increased the maximum penalties available to the courts. Interviewees were asked about them. None of those interviewed knew that the penalties could vary between the Crown courts and the Magistrates courts, or were able to state the precise penalties that could be imposed.

Two interviewees could not state any penalties at all. Of the remainder, five knew that a prison sentence was an option that could be used by the courts. Fines ranging from €2000 to €30000 were quoted, with three people not willing to state a precise figure. Four replies included the fact that a lot of bad press would also be a consequence of prosecution. Seventeen interviewees were aware that (as well as prosecution) consumers could also claim compensation if they were injured by food from the establishment.
3.6 * Questions 35 to 48 (Further questions about the Food

Hygiene (Amendment) Regulations 1991)

This area may be sub-divided as follows:-

3.6.1. Penalties - The Regulations
3.6.2. Food storage
3.6.3. Temperature controls
3.6.4. Equipment purchased as a result of the
       introduction of the Regulations

3.6.1. Penalties - The Regulations

Regulations made under the Act have their own level of
penalties, none of the participants were aware of these
and ten thought they were the same as those imposed
under the Act.

Fourteen people were aware that if convicted of an
offence under the Regulations, they could be
disqualified from using premises as catering premises
for a period not exceeding two years.
3.6.2. Food storage

Everyone interviewed knew that the temperatures for storing foods (both hot and cold) had changed and some of the interviewees mentioned that the temperature limits were also due to change in 1993. When asked what these temperatures currently were, replies were varied and can be seen below in table 9:

Table 9
PERCEIVED FOOD STORAGE TEMPERATURE LIMITS

<table>
<thead>
<tr>
<th>Cold food</th>
<th>Hot food</th>
<th></th>
</tr>
</thead>
<tbody>
<tr>
<td>below 2°C</td>
<td>- 1 response</td>
<td>above 63°C</td>
</tr>
<tr>
<td>below 3°C</td>
<td>- 2 responses</td>
<td>- 6 responses</td>
</tr>
<tr>
<td>below 4°C</td>
<td>- 1 &quot;</td>
<td>above 65°C</td>
</tr>
<tr>
<td>below 5°C</td>
<td>- 3 &quot;</td>
<td>- 3 &quot;</td>
</tr>
<tr>
<td>below 8°C</td>
<td>- 5 &quot;</td>
<td>above 68°C</td>
</tr>
<tr>
<td>not known</td>
<td>- 8 &quot;</td>
<td>not known</td>
</tr>
</tbody>
</table>

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Participants were asked to give examples of foods which would be stored under these temperature conditions. Four were unable to do so, four were very vague and four stated all fresh foods were applicable. Four gave examples in some detail and two stated that everything edible was applicable. One person said that most foods should be stored under temperature controls and one specified all high risk protein foods with a pH above 4.5.
Participants were also asked if any foods were exempt from these storage temperatures. Replies may be seen below in table 10. (N.B. Care was taken not to ask leading questions):

Table 10
FOODS STATED AS BEING EXEMPT FROM THE TEMPERATURE LIMITS

<table>
<thead>
<tr>
<th>FOODS</th>
<th>NUMBER OF PEOPLE</th>
</tr>
</thead>
<tbody>
<tr>
<td>Crisps</td>
<td>1 person</td>
</tr>
<tr>
<td>All dried and tinned goods</td>
<td>6 persons</td>
</tr>
<tr>
<td>Milk and ice-cream</td>
<td>1 person</td>
</tr>
<tr>
<td>Fruit</td>
<td>2 persons</td>
</tr>
<tr>
<td>Some soft cheeses</td>
<td>1 person</td>
</tr>
<tr>
<td>Some hard cheeses, custards and tarts</td>
<td>1 &quot;</td>
</tr>
<tr>
<td>Foods below pH 4.5 (i.e. salamis)</td>
<td>1 &quot;</td>
</tr>
<tr>
<td>No examples given</td>
<td>7 persons</td>
</tr>
</tbody>
</table>
3.6.3. Temperature controls

This section dealt with refrigerators, chilling cabinets and the use of probe thermometers. Everyone interviewed stated that the temperature in their refrigerators was monitored in some way. This was normally carried out by members of the kitchen staff although in one establishment it was done by the Catering Manager. At least one interviewee stated that the readings were not recorded. The temperatures were monitored over varying timescales ranging from three to four times a day, to "very occasionally". Most were based on a set routine and between once a day and two to three times a day were the most common responses (twelve). The frequency of monitoring was not known in four cases. Five participants stated that they had refrigerators, freezers or chilling cabinets which were either faulty or in need of attention.
Participants were also asked if they knew that the temperature varies in refrigerators, and in what circumstances. Responses may be seen below in table 11:

Table 11
PERCEIVED TEMPERATURE VARIATION IN REFRIGERATORS

<table>
<thead>
<tr>
<th>Response</th>
<th>Count</th>
</tr>
</thead>
<tbody>
<tr>
<td>&quot;when the door is opened&quot;</td>
<td>11 persons</td>
</tr>
<tr>
<td>&quot;when hot food is put inside&quot;</td>
<td>1 person</td>
</tr>
<tr>
<td>&quot;hot air rises&quot;</td>
<td>1 person</td>
</tr>
<tr>
<td>&quot;obviously!&quot;</td>
<td>1</td>
</tr>
<tr>
<td>&quot;near the door&quot;</td>
<td>1</td>
</tr>
<tr>
<td>&quot;incorrect storage of food&quot;</td>
<td>1</td>
</tr>
<tr>
<td>&quot;it's well known&quot;</td>
<td>1</td>
</tr>
</tbody>
</table>

In thirteen of the hotels visited, foods were displayed in view of the customer or outside of the kitchen area. In most cases this was in the form of buffets (hot and cold), carvers and sweet trolleys. In one instance, bar food was also given as an example. Of these, eleven participants stated that these foods were pre-chilled prior to being displayed (in the case of cold foods).
When asked if probe thermometers were used when monitoring the temperature of foods, fourteen participants replied positively, four said no they were not and two did not know.

3.6.4. Equipment purchased as a result of the introduction of the Regulations

Thirteen of the people interviewed said that some new items of equipment had been purchased. These included:

sterile swabs/wipes
storage containers
food trays
hats and coats
bins with lids
refrigerators and/or freezers

Participants were asked if they would be interested in a short course on the monitoring and control of storage and display temperatures. Sixteen said no, three said possibly and one stated that it should be part of the Basic Certificate.
3.7 Questions 49 to 69 (Training)

This section was concerned with various aspects of food safety training. All participants agreed that training in this area should be compulsory, especially for all members of management and staff engaged in food handling. Various comments were made and included:

"the hotel wouldn't exist without it"
"yes - it means more money"
"at least to basic level"
"to varying levels"
"yes - it's law!"

One person made the comment that the government should contribute towards training costs. None had a part of their training budget specifically allocated to food hygiene/safety and seven participants stated that the funding of food hygiene courses could be a problem.

Sixteen were not aware that there could be a grant system operated by the local authority.

Nineteen of the people interviewed stated that they and/or members of the management and staff had a food hygiene certificate. The number of people with Certificates varied from one to everyone depending on the size of the hotel and the hotel or company policy. Although there was some uncertainty about the precise
number of people qualified, at least eight participants quoted the Basic Certificate as being obtained and ten quoted a mix of all three levels. It was the policy in three hotels for all personnel associated with food handling to have the Basic Certificate at least. One hotel visited did not have any personnel qualified in food safety. Eleven of the hotels had a member of management or staff responsible for food hygiene training. Their own qualifications (food hygiene) varied from the Basic Certificate to Advanced with one person having no qualifications at all in this area.

The Basic Certificate was the most familiar to the interviewees and when questioned about the content matter, twelve of them stated that it should stay as it is.

It became apparent that this training had been received before January 1991 in some cases and afterwards in others, although ten of the interviewees stated that the training had been carried out as a result of the new Legislation. No preference was stated regarding the three organisations that award the food hygiene certificates. One person was not aware that there were three such organisations.
Although fifteen of the people interviewed said that the training received so far would be sufficient for their needs, twelve also said that there would be a future requirement for more staff training. As well as previous comments regarding all staff being trained to the Basic level in certain hotels, many of the senior food handlers (i.e. the Head Chef, certain other chefs, and some other Heads of Departments) would be trained to the Intermediate or Advanced levels. One hotel had a policy where all new staff will be required to have the Basic Certificate prior to engagement.

The participants were asked how the lasting effectiveness of the training received would be monitored. Four did not know. Those who had considered this course of action provided various comments including:

"the Heads of Departments will look after it"
"by tests, observation and records"
"training sessions and supervision"
"refresher courses"
"three monthly checks and updates"
"as part of a Head Office programme"
Fifteen of the hotels had received leaflets/brochures from, or had been approached by, various training organisations offering food hygiene training. These are listed below in table 12:

Table 12
TRAINING ORGANISATIONS OFFERING FOOD HYGIENE TRAINING

<table>
<thead>
<tr>
<th>Colleges</th>
<th>3 responses</th>
</tr>
</thead>
<tbody>
<tr>
<td>The Hotel and Catering training Company</td>
<td>4</td>
</tr>
<tr>
<td>Independent training bodies</td>
<td>5</td>
</tr>
<tr>
<td>Croners</td>
<td>1 response</td>
</tr>
<tr>
<td>The Environmental Services</td>
<td>1</td>
</tr>
<tr>
<td>Various leaflets (origin unknown)</td>
<td>5</td>
</tr>
</tbody>
</table>

Participants were also asked where they would go to (or have been to) for information regarding the provision of food hygiene training. Fifteen said that they would contact the Environmental Health Officer. Of these, eight also said that they would approach their Head Office. Colleges were mentioned by two people and the Hotel and catering Training Company by one. Trade
suppliers and Food Hygiene International were also mentioned.

A question was asked regarding the establishment of a "helpline" specific to food hygiene/safety matters. This would enable caterers/hoteliers and their staff to ask about particular subject areas or problems at short notice. Twelve stated that they would like to see one established. Of these, nine said that the local Environmental Health Officers would be the best placed people to offer such a service. Two were not sure who would do it and one said that it should be set up by an independent Government body.

The final question related to the possible need for food hygiene courses to be offered in a minority language. Eighteen people saw no need for this to happen, one suggested French as a possibility and one said that a language "problem" would only exist in London.
DISCUSSION

4.1 GENERAL FINDINGS OF THE INVESTIGATION

In the main, the introduction of new legislation has been supported by industry and enforcement authorities alike. It has been stated that there appears to be a great deal of confusion regarding its administration, interpretation and requirements. One of Britain's largest contract caterers has described the new Act as being:

"incompetence administered, causing confusion and fear in the industry"   (9)

The company also claimed that:

"the wording was sometimes ambiguous, abbreviated or over-technical"   (9)

The findings of this survey would seem to confirm this confusion.

Of the hotels approached by the author, nine declined to participate. It was quite noticeable that these establishments were in the main small hotels, i.e. privately owned (often family run) hotels and guest
houses of which there are many in and around Cardiff. Reasons for non-participation may be speculative. The discussions that took place, together with the tone of the replies, indicated that there could well be an element of fear involved regarding the new legislation, and this may be due to a lack of knowledge of it. The subject of Food Safety often instils a feeling of unease among some people within the catering industry, as do Environmental Health Officers. However, EHOs are an ideal source of advice and guidance, even more so now with plans to streamline the ways in which they work expected to come into effect in Autumn 1992. The Government's new Code of Practice for food hygiene inspections details the criteria used by EHOs and Trading Standards Officers (TSOs) to inspect premises. This Code of Practice is available to personnel within the trade as an aid to identifying possible risk areas in anticipation of a hygiene visit or inspection.

Time (or the lack of it) is always a problem for hoteliers and their staff and this is well understood. However, one wonders if there are other more worrying factors to be considered for not wishing to participate. How many of these hotels are fully committed to conforming with the legislation? Are some of them worried that an "outsider" will become aware of how much they do or do not know about it? People can no
longer bury their heads in the sand, the legislation is here and it is here to stay! - Due diligence with all its implications is crucial to all areas of hospitality, and if hoteliers want to stay in business, they must come to terms with this fact sooner rather than later. Whatever the reasons, there is great cause for concern as the hotel industry largely consists of small independent businesses with no formal quality assurance programmes. This is particularly true of South Wales where they are especially important to the economy (10). Perhaps small hoteliers need to form themselves into associations or consortia so that matters such as these can be addressed collectively.

It should also be stated that two of the (larger) hotels declined because the management teams had recently been restructured, involving promotions and new appointments. In view of this, the managers approached by the author felt unable to be interviewed until a better working knowledge of the establishment had been achieved.

The fact that the postal questionnaire was not returned would seem to re-enforce the comments made previously in paragraph 2.2.
The findings of this survey show that at the very least, people within the hotel sector know that new legislation has come into effect, with 65% of the people interviewed feeling that they had become more personally aware of the dangers of handling foodstuffs. However, the manner in which the replies were given indicated that there was confusion between what an Act was, and what the Regulations were in relation to that Act. Also, only 30% of the people interviewed knew the name of the Act.

Whilst articles have appeared in trade magazines, they tend to be on an irregular basis. There would appear to be a need for regular and consistent informative articles so that caterers can keep abreast of developments.

In this, as well as other areas, it would seem that unless trade journals contain up to date information and are received regularly (and read diligently), or an organisation subscribes to an appropriate publication such as "Croners", sources of information tend to be few and far between. Perhaps the professional organisations (i.e. the Hotel and Catering Institutional Management Association) should have a role to play in this respect. It does help of course to have a good working relationship with the EHOs and
therefore pre-empt potential problems before they occur.

Whereas 65% of the interviewees thought the legislation was easy to understand, when pressed, 45% of them thought some areas were confusing and the replies received indicate that there is much greater confusion in reality. The storage and holding temperatures of certain foods is one area where doubt was shown, as portrayed by the wide range of responses - 35% did not know the temperature requirements for food storage as laid down by the Regulations.

It was very clear that the main aims of the new Act were not known. Increased awareness was mentioned many times, but none of the people interviewed knew the specific aims in relation to those in the previous (1984) Act. This would imply that the reasons for introducing the Act in the first place were also not known (i.e. to combat rising cases of Food Poisoning). Providing food which is safe to eat is well appreciated by the catering trade, but the need to strengthen the previous legal powers and penalties, as well as the need to keep pace with technological changes were not mentioned at all. It should be remembered that the whole structure of the food industry has changed radically over the past fifty years.
4.2 OFFENCES AND REGISTRATION

Similarly, knowledge about the offences under the Act appear to be an area for concern. It is interesting to note that whilst 60% of the interviewees thought the legislation was severe enough, only 15% actually knew what the offences were. The fact that Food Poisoning occurs is widely appreciated, what is less well known are the legal interpretations. For example:

"selling or possessing for sale
food which does not comply with
food safety requirements"

"selling, to the purchaser's prejudice,
food which is not of the nature, substance
or quality demanded"

"falsely or misleading describing
or presenting food"

"rendering food injurious to health" (6)

The registration of food premises was a major area of confusion with 75% of the participants not knowing the deadline for registration and 50% not knowing that it would be an offence not to register. Even the people
who stated that their hotels had been registered
displayed confusion as to who they had been registered
with. However, to some extent, this was to be expected.
Initially, regulations governing the registration of
premises were expected to come into effect on 1st April
1991 (the Food Premises [Registration] Regulations
1991). There was however, difficulty in finalising the
details, and implementation was delayed. Registration
eventually became compulsory from 1st May 1992. (11)

Whether registration has been fully understood is
therefore open to question. Many premises may be
failing to register, a worry that has been expressed
elsewhere:

"thousands of caterers across
Britain are breaking the law" (12)

Hoteliers should understand that registration requires
their active participation as the responsibility for
registration is theirs. Managers in larger hotels can
take some comfort from the fact that their Head Offices
possibly took action to register "en bloc". Individual
hoteliers however, are on their own in this respect.
4.3 PURCHASING AND ACCEPTING FOODSTUFFS

Questions were also asked about the purchasing, delivery and acceptance of foodstuffs. This is an important area within the realm of due diligence. Answers received indicate that very few of the hotels visited would be in a position to fulfil these requirements.

For example, whilst 90% of the participants knew that some sort of systems approach must be adopted when receiving foodstuffs, only 25% claimed to be doing something about it. Quality assurance must take a much higher profile in hotels in their "back of house" operations, especially with regard to the purchasing and receiving of foodstuffs. It seems that many people have yet to realise this point. It would appear that unless more is done to make people more aware, effective procedures and systems will not be forthcoming for some time in many hotels.

Managers in larger premises are again at an advantage as they have substantial resources to fall back on. People in smaller hotels however, have no back up facilities unless they can obtain advice from the local Environmental Health Department, or from small hotel consortia.
4.4 ENFORCEMENT AND PENALTIES

Although some EHOs adopt an advisory role, their basic function did not change with the introduction of the new legislation. Yet 20% of the interviewees did not know that they were responsible for enforcement. There was also a wide range of responses regarding the role of EHOs, indicating confusion over their powers, even though 60% of the hotels had been visited at least once since the introduction of the new legislation. An interesting response regarding these visits revealed that only 20% of the participants thought that the inspections were carried out more thoroughly. The varied responses also raise the question as to how much of an educational responsibility do EHOs have regarding the food industry. Perhaps the advisory role adopted by some EHOs should become more formalised.

It is also clear that there is a lack of understanding as well as some confusion regarding the various notices, orders and penalties that can be implemented and imposed. 65% of the people interviewed did not understand what Improvement Notices and Prohibition Orders were, with the same number not knowing the consequences of them being imposed. It therefore appears that hoteliers and their staff are not aware of what can happen to them if EHOs decide to take
proceedings against them. This is also corroborated by the range of responses regarding fines and/or imprisonment.

One of the major features of the new legislation was the revision of the level of financial penalties that could be imposed, together with the introduction of prison sentences. Two points emerged from the responses; firstly, none of the participants could accurately state the penalties and secondly, they were also unaware of the difference in the penalties between the Act and the Regulations. This lack of awareness regarding the Act and the Regulations was displayed frequently during the interviews.

4.5 DUE DILIGENCE

Regarding due diligence, hoteliers and all their management and staff, as well as all other caterers need to understand the whole philosophy of it and accept it as a positive step. Courts are showing an increasing willingness to use the powers of the Act to the full in order to eliminate bad hygiene practices with increased fines being imposed (13). Prohibition Orders are also being imposed. In one recent case:
"magistrates placed a ban, stated
to be for life, on a food wholesaler
whose hygiene practices were found
to be seriously wanting"  (13)

70% of the people interviewed did not know, or were not sure of the due diligence defence. This is quite worrying bearing in mind that this is fundamental to the new legislation. Although a few participants were able to talk about "reasonable precautions", replies were generally quite vague.

It became very obvious that industry is not aware of the full implications. At the very least there is a misunderstanding of the defence of due diligence and in some cases, total confusion. The main due diligence defence in section 21 of the Act states that:

"it is a defence for the accused
to prove that he or she took all reasonable precautions and exercised all due diligence to avoid commission of the offence"  (14)
Reasonable precautions are seen as involving an assessment of the risk areas and the setting up of systems in order to avoid or deal with, these risks.

Exercising all due diligence is not the same thing. Due diligence means ensuring that the systems actually work in practice. Management and staff must be vigilant and make certain that the systems operate effectively.

These control systems must be continually under review, especially when any changes are made to processes, equipment or staffing. Records must be kept if the defence is to be offered successfully, as evidence will be asked for where necessary.

The following list indicates some of the areas where systems must be effectively implemented:

cleaning and pest control
storage and stock rotation
food preparation and cooking
temperature control
refuse disposal
personal hygiene and training
Publications such as Croners Practical Food Hygiene provide excellent examples of systems audits, monitoring records and action plans.

4.6 FOOD STORAGE

Food storage and temperature controls are covered comprehensively in the Food Hygiene (Amendment) Regulations 1990 and 1991. 85% of the people interviewed stated that they had read some form of information regarding them, and all of them stated that they monitored refrigerator temperatures. However, replies indicate that few do in fact have a system in operation. The monitoring of temperatures "almost daily", "three to four times daily", "every two to three hours" and "twice weekly" does not conform to the principles of due diligence and indicate again a misunderstanding of the requirements of the legislation. Also, the monitoring of temperatures and the recording of them are two entirely different processes which must be understood as well as implemented.

It was very interesting to note that although 70% of the interviewees claimed to have probe thermometers in their establishments, only one person said that they were used to monitor the temperature of cold foods.
Not only will EHOs be interested in the temperature recording system itself, they will equally be concerned with the capability and operating performance of the refrigerators and freezers (15). This means that at least 25% of the hotels visited will need to rectify the faults with their equipment as soon as possible in order to satisfy the legal requirements.

Many of the hotels visited (65%) display food in the restaurant or in other rooms when parties or functions are held. Of these, 55% said that the foods were (where in a cold state) pre-chilled first. However, if this means keeping them in the refrigerator for a short while after preparation and prior to display, then that may not be enough to reduce the core temperature sufficiently and as quickly as possible. Undoubtedly the best way of achieving core temperatures of below 8°C is by blast chilling the products prior to refrigeration and it is the view of the author that this method should be used wherever possible.

It was also clear from the responses that there is confusion and a general lack of knowledge regarding which foods should be kept at what temperatures (only 25% knew the new lower limit and 30% were able to state the upper limit), and for how long. But when asked if
short courses on temperatures and controls should be available 75% of the participants said no.

It may well be of course that Head Chefs and Restaurant Managers are more aware of the Regulations and are operating efficiently and satisfactorily on a day to day basis. However, the Regulations are not only lengthy and involved but are being implemented within a two tier system. That is to say, the present "low" temperature of 8°C will change to 5°C for certain foods in April 1993. This must be causing some confusion.

25% of the hotels have buffet displays at some time, this is not surprising considering the very nature of their business. Operators and Supervisors as well as Managers need to be more aware of the specific requirements.

An area that must be considered very carefully by the hotels is the use (or not) of the food after it has been displayed. If, as the replies suggest, the temperature of the food is not monitored and recorded adequately, it is difficult to decide whether the food should be considered for re-use. If adequate chilling and/or heating has been applied, then the food could possibly be re-used, provided that the temperature controls have been maintained.
4.7 **TRAINING**

As far as training is concerned, replies indicated that there is no requirement for extra training in the areas of food storage and temperature control. However, whilst many staff (95%) are being trained to the Basic Certificate at least, it does not appear to be making an impact. This is in spite of the fact that 40% of the hotels have at least one member of staff trained to the Intermediate or Advanced levels. Only 15% had a policy of all food handlers being trained. It is the view of the author that **all** food handlers should at least be trained to the Basic Certificate level, with supervisors having the Intermediate Certificate. Head Chefs and Food and Beverage Managers should have the Advanced Certificate so that they can also have an input into the training of their staff.

The catering Industry employs large numbers of staff, including unskilled, agency and casual workers. It is imperative that there is a co-ordinated approach to training in order to minimise health risks.

The hotel and catering industry is often associated with low status, long hours and bad pay and conditions. It could be argued that while this situation exists, it does not matter how much training is given or received!
It is one thing to train the management and staff to the various levels required, it is quite another for them to be motivated enough to implement the legal requirements.

If adequate standards of food safety and hygiene are to be achieved and maintained, training is vital. Everyone interviewed agreed that Food Safety training should be compulsory, especially for members of management and staff engaged directly in food handling. Managers must assume the responsibility for food hygiene and ensure that front-line supervisors are adequately trained as well as the more junior levels of staff.

At the moment training is not compulsory; however, Regulations will be developed making it obligatory. The problem is - Who needs to be trained, to what level, and how? It is apparent from the survey that some training has been received. The degree to which this training has been utilised is open to interpretation. Many of the people interviewed would have received it as an integral part of other courses of study, with most of their training being received prior to January 1991. Therefore, they would not have received details of the new legislation. City and Guilds for example, includes food hygiene in it's craft training schemes, as does the Business and Technology Education Council
(BTEC). Many colleges also now offer the Basic Hygiene Certificate course as part of their teaching package. Large organisations often develop their own programmes (or they link with colleges) and this was also reflected in some of the replies. Also reflected is the number of other organisations offering food hygiene training.

If the training offered is to be positively effective, then a system of uniformity of standards is necessary; especially if there is to be a mandatory requirement. Also, (as indicated earlier), the results of the training must be put into practice. Unfortunately, training can be expensive and is often the first casualty when times are hard. Only 60% of the hotels visited have a training budget. Of these, it seems that nothing is allocated on a regular basis to Food Safety. Perhaps this will change when Regulations regarding training are introduced. If funding is a problem (as indicated by 40% of the participants), then one answer may be for them to form consortia with a view to reducing costs. This not only applies to training, but to other areas as well, i.e. the purchasing of equipment. It could also prove beneficial for the dissemination of information.
It is worth repeating that adequate training will become an integral part of the due diligence defence and suitable training programmes will be necessary.

4.8 **FOOD SAFETY AND TOURISM**

Food Safety also needs to be considered in a European context. We are after all becoming increasingly integrated with our mainland European partners, and one of the aims of the new Act is to enable this country to fulfil its role within the European Community. In fact, the Commission has an unpublished draft document giving an insight into what the future holds:

"food business operators shall ensure that food handlers are trained or supervised commensurate with their work activity"  

Tourism plays a vital role in the economy of this country with millions of overseas visitors being attracted each year. It is important that they go away with a positive attitude to the country. The hospitality sector has a crucial part to play in this role by ensuring that all visitors enjoy their stay. High standards of accommodation and service are very important, but so too are high standards of food quality. Food safety must be paramount in the minds of
all who work in this area. This can only be achieved if food handlers and their management are armed with sufficient knowledge, and have the motivation for this to be the case. This is more likely to happen if there is clear and positive legislation.
RECOMMENDATIONS

All the findings of this limited survey indicate confusion and a lack of awareness regarding the new Legislation. The following recommendations can be made:

1. A more effective method of communication should be implemented. This should be considered within a three-tier system:

   a). From Government to Industry (and to Local Authorities)

   b). From Local Authority to Industry

   c). Within Industry itself

The Government should ensure that all legal requirements are effectively communicated and received. Information and requirements should be provided on a regular basis and in a more formal manner in order to target everyone concerned, including new businesses that may have been set up since the introduction of the legislation.
2. Local Authorities should ensure that there is an effective system for notifying all hotels (and other catering outlets) of all changes and/or requirements before they occur (where not directly carried out by the Government).

3. Where hotels form part of a chain, the management should ensure that all legal requirements are distributed and acted upon.

4. Professional Associations and Trade Journals should also play a more active role by liaising more closely with Industry, between themselves and by printing more informative articles.

5. An "advice line" or central point of contact should be set up enabling all caterers to obtain immediate assistance when required. This could be provided by Private Organisations, Colleges, Local Authorities or the Government, with a small charge to cover operating costs.
6. Environmental Health Officers and Trading Standards Officers should be resourced sufficiently so that they can ensure that essential information is distributed effectively and offer advice and guidance where needed, especially to the smaller establishments. Or, advisers should be employed to carry out this function.

7. In many cases, hoteliers and their management should review their training policies and act upon training needs. Particular attention should be paid to management and supervisor levels. By forming partnerships, and with adequate foresight, levels of financial expenditure can be kept to the minimum.

8. The forthcoming Food Safety and Hygiene training requirements should be published as soon as possible. They must be easily understood, positive, and provide for uniformity across the catering field.

9. The large number of small hotels in and around Cardiff should consider forming consortia in order to effectively and economically comply with the new Legislation.

10. A further survey should be carried out over a wider area in order to examine the Quality Assurance
procedures in hotels, with special emphasis in the Food and Beverage departments.
REFERENCES

   Published by Edward Arnold

   Published by HMSO

   Office of Population, Censuses and Surveys.


   Published by Sterling Publications Ltd., London

   Issued by Food Sense, London, (PB0351)


Croner Publications Ltd.

Published by the HCIMA in association with Wordsmith and Company.

MCB University Press Ltd.
APPENDIX ONE

FORBORNE DISEASE SURVEILLANCE IN ENGLAND AND WALES: 1985
Food poisoning reported by laboratories, MOSEY and EWES 1985: place of outbreak.

<table>
<thead>
<tr>
<th>Place of Outbreak</th>
<th>Count</th>
</tr>
</thead>
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<tr>
<td>Private houses</td>
<td>259</td>
</tr>
<tr>
<td>Restaurants/receptions</td>
<td>64</td>
</tr>
<tr>
<td>Hospitals</td>
<td>36</td>
</tr>
<tr>
<td>Institutions</td>
<td>19</td>
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<tr>
<td>Schools</td>
<td>8</td>
</tr>
<tr>
<td>Shops</td>
<td>5</td>
</tr>
<tr>
<td>Canteens</td>
<td>10</td>
</tr>
<tr>
<td>Farms</td>
<td>3</td>
</tr>
<tr>
<td>Infected abroad</td>
<td>9</td>
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<tr>
<td>Other</td>
<td>24</td>
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<tr>
<td>Unspecified</td>
<td>26</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>463</strong></td>
</tr>
</tbody>
</table>
APPENDIX TWO

LETTER TO THE SECRETARY OF THE ALL WALES CHIEF ENVIRONMENTAL HEALTH OFFICERS PANEL
Mr L Cartwright  
Radnorshire District Council  
District Office  
Llandrindod Wells  
POWYS

Dear Sir,

REFERENCE: THE FOOD SAFETY ACT 1990

Further to our telephone conversation, I am writing to confirm that I am undertaking a research project aimed at establishing what impact the Food Safety Act 1990 has had so far. The following statements may help to clarify the project in more detail.

1. The research will be carried out over a period of approximately five months, (September 1991 to January 1992)

2. It is aimed at employers and employees in the hotel trade only.

3. Initially, Cardiff/South Glamorgan will be the research area, but it may possibly extend to encompass South Wales as a whole.

4. The main aims are to gather information regarding views and attitudes towards the legislation, and to find out what is actually being done about it.

I hope this brief summary is suitable for your needs. If you require any further information, please do not hesitate to contact me on Ext.2219/2220.

Yours faithfully

P D Coleman
APPENDIX THREE

EXTRACT FROM THE HOTEL PROPRIETORS ACT 1956
"In this Act, the expression [hotel] means an establishment held out by the proprietor as offering food, drink and, if so required, sleeping accommodation, without special contract, to any traveller presenting himself who appears able and willing to pay a reasonable sum for the services and facilities provided and who is in a fit state to be received."
APPENDIX FOUR

STRUCTURED INTERVIEW QUESTIONS
THE IMPACT OF NEW FOOD LEGISLATION ON THE HOTEL INDUSTRY
IN SOUTH GLAMORGAN

STRUCTURED INTERVIEW QUESTIONS

INTERVIEWER: P D COLEMAN
REPRESENTATIVE: ......................
ESTABLISHMENT: ......................
INTRODUCTORY QUESTIONS

1. New food safety legislation has been (and still is being) introduced this year. Could you tell me the name of the Act concerned and the Regulations included in it?

2. Have you read the Act and the Regulations, or relevant information leaflets about them?

3. Did you/do you find the legislation easy to understand?

4. Did you/do you find any elements of the legislation confusing?
   If yes; What parts? ...

5. Could you explain what the main aims of the Food Safety Act are?
6. Do you possess a copy (copies) of the Act or any explanatory leaflets? If so - where were they obtained from?

7. Most operations/businesses covered by the legislation are required to register -
   
   Have you registered your business?
   Do you know who with?
   When did you register?
   Do you know when the deadline for registering was?
   Do you know that it is a criminal offence to operate after this date if you have not registered?

8. What do you understand by the term "food handler", and which of your staff do you consider to be food handlers?

   (lead into if necessary):

   Chefs, kitchen assistants, bar staff, managers, accommodation staff, restaurant staff, etc.

9. What do you understand by the term "purchaser" according to the legislation

10. What does the Act mean by the term "food"?
11. Please explain how the legislation has changed with regard to deliveries and acceptance of foodstuffs?

12. Please explain how the legislation has changed with regard to purchasing?

13. What effect has the legislation had on you and your premises?

14. Has your approach to food safety changed since the introduction of the legislation?

15. What changes have you made in response to the legislation (if any)?

16. Do you anticipate carrying out any further changes – in the short term? in the long term?

17. Do you think the new legislation is? too lenient
18. Please explain what the four main offences are?

(as follows)
Not complying with food safety requirements
Injurious to health
not of nature, substance or quality
falsely or misleadingly described

ENFORCEMENT QUESTIONS

19. Do you know who is responsible for enforcing the legislation?

20. Do you understand what an EHO is required to do if visiting an establishment and what he can request to see?

  Appropriate premises
  Evidence of identity
  At reasonable times
  24hrs notice for private houses
  Secured unnocupied, must leave the same
  Must not reveal trade secrets
  Food samples may be taken
  Food samples may also be bought (and/or received from a {complaining} customer)
21. Do you know what can happen if an EHO finds suspect food?

A notice (and not to be used/consumed) (21 days)

Can be seized

JP can order destruction (owner meets expenses) (including the whole batch, if applicable)

If not destroyed, compensation = to loss in value (can go to arbitration)

22. Do you know what can happen if an EHO finds unsatisfactory premises?

Improvement notice

Prohibition order

Emergency prohibition notice

Emergency prohibition order

23. (Depending on reply to Q.22)
Do you understand the difference between them?

Improvement notice

Prohibition order

Emergency prohibition notice

Emergency prohibition order

24. Would you know the consequences of a prohibition order being imposed:

(explain each)

on you?
on your business?

25. How frequently are you inspected by the EHO's?

26. Have you been inspected since January 1991?

27. Did you perceive any differences during that inspection to those that had taken place previously?
   Please explain ...

28. Please explain any differences in attitude or approach to the inspection of the Environmental Health Officer.

29. Can you tell me the outcome of the visit?

DEFENCES UNDER THE FOOD SAFETY ACT 1990

30. Do you know what defences may be offered if prosecuted under the Food Safety Act 1990?

31. (Depending on reply to Q.30) Do you understand the meaning of "due diligence" and "reasonable precautions"?
   Please explain ...
32. Do you know that there is an appeals procedure that you can take if action is taken against you?

Please explain ...

**PENALTIES**

33. Do you know what penalties can be imposed upon you by the courts if you were found to be an offender?

Please explain ...

Magistrates court

County court

34. Do you know that consumers can also claim compensation from you if they have been injured by food from your premises?

**THE FOOD HYGIENE (AMENDMENT) REGULATIONS 1990**

35. (Linked to Q.6) Do you possess a copy of the Regulations or any explanatory leaflets? If so - Where were they obtained from?
36. Do you know why the temperatures at which certain foods for human consumption are to be kept, have changed?

37. Please explain what the required temperatures are for:
   storing cold food ...
   storing hot food ....

38. Can you give any examples of these foods?

39. Can you give any examples of foods that are exempted from these temperature change regulations?

40. The penalties that can be imposed under the Regulations are different from those under the Food Safety Act. Do you know what they are?

41. If convicted of an offence under the Regulations, do you know that you could be disqualified from using premises as catering premises for a period not exceeding two years?
42. Are refrigerator temperatures monitored?
   If so;
   How? ...
   How frequently are checks/recordings carried out?

43. Do you possess a probe thermometer?
   If yes;
   What is the make and type?
   (e.g. thermister or thermocouple)

44. Do you know that the temperature varies in refrigerators?
   If yes;
   Please explain ...

45. Have any new items of equipment been purchased as a result of the new legislation?
   As follows:-

46. Do you have any cooling/chilling cabinets in which the temperature is difficult to control?
   If yes;
   Please explain ...

47. Do you display any foods in view of the customer or out of the kitchen area?
If yes;
Are they:-
Pre-chilled ... Rapid chilled ...
prior to being displayed?

48. Would you be interested in a short course (for you or your staff) on the monitoring/control of storage and display temperatures?
   If yes;
   Duration? ...

TRAINING

49. Do you feel that compulsory food safety training will be of benefit to your business?

   Please expand ...

50. If the answer to question 49 is positive. Do you think that all members of management and staff engaged in food handling should receive training?
   If not;
   Please expand ...
51. Do you or any of your management/staff presently hold a certificate in food hygiene?

52. If yes, was this training received prior to January 1991 or after?

53. What levels of qualifications are held?

54. Has this training proved adequate for your needs?

55. Do you anticipate a future requirement for staff to be trained, and to what level?
   (e.g. "advanced" training in order to become in-house trainers)

56. There are currently three organizations offering food hygiene qualification certificates who are recognised by the authorities:

   The Royal Institute of Health
   The Institution of Environmental Health Officers
The Royal Institute for Public Health and Hygiene

Do you have a preference for any of the above organisations?

57. Have you been approached by any "Training body" prior to, or since the introduction of, the Food Safety Act.

If yes;

Who? ...

58. Where would you go (have you gone) to for information regarding the availability of food hygiene/safety training?

   e.g.
   MAFF publications/mailshots
   The local environmental health office
   Local press advertisements
   Colleges of further/higher education
   Other educational sources
   Independent training organisations
   Head office (in the case of companies)
   Trade associations

59. Do you have a member of your management or staff responsible for food hygiene/safety training?

   If yes;

   Who? ...

60. What qualification do they hold?
61. If training has taken place, please explain whether any action has been implemented as a direct result of it:

(e.g. cleaning schedules, temperature monitoring etc.)

62. How will the lasting effectiveness of training be monitored?

63. Would you like to see a "helpline" specific to food safety established?

(e.g. for matters of training, quality control, design, temperatures, etc.)

64. Who do you think would be best qualified to provide such a service?

The local authority (i.e. the EHO's)

Educational institutions

Private sector consultants

Trade associations

65. Does your business/company have a training budget?

If yes;

What percentage is allocated to food hygiene/safety?
66. Could the funding of food hygiene courses prove a problem?

67. Do you know that financial assistance may be available by way of local authority grants?

68. At present, basic hygiene certificates are broad based. Would you prefer to see any elements of specialisation included? (for example, in an "add-on" form)

69. Would there be a requirement for courses to be conveyed in a minority language

70. Would you like a copy of the Research Project Report when it is ready?

   Yes ....

   No .....
APPENDIX FIVE

CARDIFF TOURISM ACCOMMODATION GUIDE
Accommodation Guide

ENJOY THE CARDIFFERENCE 1990/91

VALID FROM JUNE 1990
(RATES SUBJECT TO CHANGE WITHOUT NOTICE)
<table>
<thead>
<tr>
<th>Name of Establishment</th>
<th>Address</th>
<th>Price for B&amp;B per night</th>
<th>No of Rooms</th>
<th>Rooms with Bath/shower</th>
<th>Evening Meal</th>
<th>Licensed</th>
<th>Car Park</th>
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<td>HOLIDAY INN</td>
<td>Mill Lane, Cardiff</td>
<td>88.75 111.50</td>
<td>90 78</td>
<td>14 182</td>
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<td>NEW HOUSE COUNTRY HOTEL</td>
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<tr>
<td>ANGEL HOTEL</td>
<td>Castle Street, Cardiff</td>
<td>76.00 90.00</td>
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<td>Circle Way East, Llandudno</td>
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<td>Park Place, Cardiff</td>
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<td>28 85</td>
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<td>CREST HOTEL</td>
<td>Castle Street, Cardiff</td>
<td>78.95 99.90</td>
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<td>Schooner Way, Atlantic Wharf</td>
<td>68.00 88.00</td>
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<td>POST HOUSE</td>
<td>Pentwyn Road, Cardiff</td>
<td>69.50 87.00</td>
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<td>ROYAL HOTEL</td>
<td>St. Mary Street, Cardiff</td>
<td>64.50 81.50</td>
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<td>WENTLOOG RESORT HOTEL</td>
<td>Castleton, Nr Cardiff</td>
<td>66.50 78.00</td>
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<td>Westgate Street, Cardiff</td>
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<td>LINCOLN HOTEL</td>
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<td>SANDRINGHAM HOTEL</td>
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<td>The Monument, St. Mary</td>
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<tr>
<td>MAXWELL MANOR</td>
<td>113/115 Whitchurch Road</td>
<td>20.70 35.65</td>
<td>4 2</td>
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<td>CATHEDRAL HOTEL</td>
<td>47/49 Cathedral Road</td>
<td>26.00 40.00</td>
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<td>GLENMOR HOTEL</td>
<td>150-152 Newport Road</td>
<td>25.00 35.00</td>
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<td>BRONTE HOTEL</td>
<td>158-162 Newport Road</td>
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<td>ST. HILARY HOTEL</td>
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<td>BEECHES HOTEL</td>
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<td>18.97 27.70</td>
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<td>CROWNDALE HOTEL</td>
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### CARDIFF ACCOMMODATION

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<tr>
<th>Name of Establishment</th>
<th>Address</th>
<th>Name of Establishment</th>
<th>Address</th>
<th>Price for B&amp;B per night</th>
<th>No of Rooms with Bath/ Shower</th>
<th>Evening Meal</th>
<th>Licensed Car Park</th>
<th>Non-smokers only</th>
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<td>1 CHALICE KEEP</td>
<td>163 Cathedral Road, Cardiff</td>
<td>2 BALKAN HOTEL</td>
<td>144 Newport Road, Cardiff</td>
<td>£16.00</td>
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<td>3 THE WILLOWS</td>
<td>128 Cathedral Road, Cardiff</td>
<td>4 PRESTE GARDEN</td>
<td>181 Cathedral Road, Cardiff</td>
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<td>4</td>
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<td>5 AUSTINS</td>
<td>11 Coldstream Terrace</td>
<td>6 CARDIFF HOTEL</td>
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<td>8 HOTEL METROPOLI</td>
<td>175 Newport Road, Cardiff</td>
<td>9 TY-GWYN</td>
<td>7 Dyfrig Street, Pontcanna</td>
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<td>10 ANNEDD LON</td>
<td>3 Dyfrig Street, Pontcanna</td>
<td>11 ADRIANA HOTEL</td>
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<td>12 GRAYS HOTEL</td>
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<td>13 ALBANY GUEST HOUSE</td>
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<td>15 AVALA HOTEL</td>
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<td>16 PLAS-Y-BRYN</td>
<td>93 Fairwater Road, Llandaff</td>
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<td>19 ROSANNA GUEST HOUSE</td>
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<td>21 AMBERLEY GUEST HOUSE</td>
<td>22 Plasturton Gardens, Cardiff</td>
<td>22 SOPHIA HOUSE</td>
<td>48 Ryder Street, Cardiff</td>
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### SELF CATERING ACCOMMODATION

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<th>Name of Establishment</th>
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<th>Price for B&amp;B per night</th>
<th>No of Rooms</th>
<th>Evening Meal</th>
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<tr>
<td>F. JENKINS</td>
<td>140 Cathedral Road, Cardiff</td>
<td>£27/10/90 to 31/12/90</td>
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<td>£120.00 weekly</td>
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<td>THE OASIS</td>
<td>2 South Road, Porthcawl</td>
<td>From £85.00 to £190.00</td>
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<th>Name of Establishment</th>
<th>Address</th>
<th>Price for B&amp;B per night</th>
<th>No of Rooms</th>
<th>Rooms with Bath</th>
<th>Evening Meal</th>
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<th>Car Park</th>
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<td>Twin £</td>
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<td>66 HILTON NATIONAL</td>
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<td>67 PARKWAY HOTEL</td>
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<td>68 WESTGATE HOTEL</td>
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<td>69 THE WEST USK LIGHTHOUSE</td>
<td>Lighthouse Road St. Brides, Wentloog</td>
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<td>70 EGERTON GREY COUNTRY HOUSE HOTEL</td>
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<td>71 MOUNT SORREL</td>
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<td>72 HOTEL INTERNATIONAL</td>
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<td>74 DYFFRYN HOUSE</td>
<td>St. Nicholas</td>
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<td>75 ALBANY HOTEL</td>
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<td>78 LOWER HOUSE FARM</td>
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<td>79 ALANDALE HOUSE</td>
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<td>81 &quot;HILL TOP&quot; GUEST HOUSE</td>
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<td>82 WHITE BARN HOUSE</td>
<td>Rhydlafrag Farm, St. Fagans</td>
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<td>83 STARCROSS GUEST HOUSE</td>
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<td>84 RHYDLAFAR FARM</td>
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<td>85 &quot;WELSH CRAFT SHOP &amp; POST HOUSE&quot;</td>
<td>St. Fagans</td>
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<td>86 &quot;TREGUFF&quot;</td>
<td>Llantrithdy, Nr. Cowbridge</td>
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<td>87 &quot;CROESO GUEST HOUSE&quot;</td>
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<td>88 MISKIN MANOR</td>
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<td>89 TREGENNA HOTEL</td>
<td>Park Terrace, Merthyr Tydfil</td>
<td>33.00 45.00</td>
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<td>90 RED LION</td>
<td>Queen Victoria Street, Tredegar</td>
<td>27.00 39.00</td>
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<td>91 ROCKY BANK GUEST HOUSE</td>
<td>15 De Bresas Drive, Porthcawl</td>
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<td><strong>POWYS ACCOMMODATION</strong></td>
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<td>92 TY CROESO HOTEL</td>
<td>Dardy, Llangattock, Crickhowell</td>
<td>15.00 38.00</td>
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PLEASE SEND ME INFORMATION ON THE FOLLOWING:

**PLEASE TICK**

- CARDIFF SHORT BREAKS PROGRAMME
- ATTRACTIONS IN AND AROUND CARDIFF
- THEATRE WHAT'S ON
- CAR HIRE
- CONFERENCE FACILITIES

**PLEASE SUPPLY:**

- CARDIFF GUIDE £1.00
- CARDIFF CASTLE GUIDE £1.50
- (A-Z) STREET MAP OF CARDIFF £1.30
- THE WONDER OF WALES VHS □ NTSC □ £11.00
- HERITAGE OF A NATION VIDEO (narrated by the late RICHARD BURTON) VHS □ PAL/NTSC □ £12.00
- THE DYLAN THOMAS TRAIL VHS □ £12.00

*NTSC required for transmission in USA/CANADA/JAPAN  *(PAL suitable for all other countries except France)

I ENCLOSE CHEQUE/P.O. TO THE VALUE OF £ ____________
PAYABLE TO CARDIFF MARKETING BUREAU

CARDIFF ACCOMMODATION GUIDE - BOOKING FORM

**NAME**

**ADDRESS**

Postcode ____________

**ADULTS** ____________  **CHILDREN** 5 - under 12 ____________

**CHILDREN** under 5 ____________

**ACCOMMODATION REQUIRED**

Single □ Double □ Quad □

Twin □ Triple □ Cot □

Total No. in Party □

Daytime Tel ____________

Evening Tel ____________

**HOTEL DETAILS**

1st CHOICE HOTEL ____________

2nd CHOICE HOTEL ____________

**DATE OF ARRIVAL**

**DATE OF DEPARTURE**

**NUMBER OF NIGHTS**

N.B. Rooms cannot be guaranteed for arrivals after 6.00pm unless notified to us.

PLEASE ENCLOSE FULL PAYMENT BY CHEQUE OR POSTAL ORDER TO:- CARDIFF MARKETING BUREAU, 8-14 BRIDGE STREET, CARDIFF CF1 2EE.

(A confirmation of booking will be sent to you)

ALTERNATIVELY FULL PAYMENT MAY BE MADE USING THE FOLLOWING CREDIT CARDS (AMEX, DINERS CLUB, ACCESS OR VISA)

**CARD NO.**

**EXPIRY DATE** ____________

PLEASE CONTACT US IF YOU HAVE ANY QUERIES OR REQUIRE ANY FURTHER INFORMATION

Details subject to change without prior notification