

ATIA Response to the Independent Report for ATAS Charter Review and Proposed Changes to ATAS Charter, Code of Conduct and ACAC Terms of Reference

October 2025

EXECUTIVE SUMMARY

Background on transition to the ATIA Accreditation Scheme

This report details the ATIA Board's response to the 7 recommendations and 2 suggestions proposed by the ATAS Independent Reviewer, Mr Michael Terceiro following a four-month review of the Scheme. As part of the 2025 review, Mr. Terceiro received 7 submissions and separate correspondence from the WA Attorney General, received four responses to the review survey and met with the Accreditation Advisory Committee.

The full report was provided to the ATIA Board on 16 September 2025 and the Independent Reviewer briefed the ATIA board on his observations. The Board has carefully considered each recommendation by analysing the impacts on AFTA operations, increasing the effectiveness and appeal of the Scheme and improving the governance and creditability of ATAS.

Of the 7 recommendations, and 2 suggestions, the ATIA Board is accepting 5 recommendations in full, partially accepting 1 and accepting 1 with alteration. The 2 suggestions have been noted by the Board

RECOMMENDATION 1

The Charter be amended to:

- A. Remove the mandatory requirement of Public Liability insurance from those members not operating in person businesses.
- B. Remove the mandatory requirement of Professional Indemnity insurance for Tour Operator members.
- C. Introduce mandatory Cyber Insurance for all members to take effect from the 2027 renewal period, commencing in April 2027.

AAC RESPONSE: It was noted that making Cyber Insurance mandatory may create a financial barrier to membership. It was recommended that rather than mandating Cyber Insurance, the implementation could be considered and explored further, noting some self-insure and could not meet a mandated requirement.

RECOMENDED ATIA RESPONSE: Accept recommendation with a 24-month review period.

ATIA RATIONALE: ATIA supports refining insurance requirements to reflect industry feedback, evolving business models, and actual risk exposure. Making Public Liability Insurance optional for non-public-facing businesses and removing mandatory Professional Indemnity Insurance for Tour Operators reduces unnecessary costs while maintaining consumer protections. These changes promote fairness, proportionality, and stronger alignment with the diverse risk profiles across the industry. Allowing 24 months to review Cyber Insurance requirements will ensure any implementation is practical and proportionate to risk.

**BOARD RESPONSE: PARTIAL ACCEPTANCE
WITH 24 MONTH REVIEW PERIOD**

Proposed Charter amendment	
<p>Addition</p> <p>S2.4(i) Page 10 Charter</p>	<p>Currently the Charter States:</p> <p>(i) Commercial Safeguards</p> <p>The applicant must provide current certificates for public liability and professional indemnity insurance policies. If the applicant holds other relevant insurance, certificates of currency may also be provided for these policies.</p> <p>Update Charter to State:</p> <p>(i)Commercial Safeguards</p> <p>The applicant must provide current certificates for public liability and/or professional indemnity insurance policies, <i>in accordance with the requirements of their business type.</i></p> <p><i>Tour Operators must provide a current public liability certificate for a policy that includes an Errors & Omissions clause or alternatively provide both current public liability and professional indemnity certificates.</i></p> <p><i>Applicants operating exclusively in a non in person capacity must provide a current professional indemnity certificate only.</i></p> <p><i>All other applicants must provide current certificates for both public liability and professional indemnity insurance.</i></p>

RECOMMENDATION 2

The Charter be amended to state that:

- A. The applicant must ensure that 50 per cent of its consumer-facing staff hold Recognised Industry Training, which may include a Certificate III in Travel or other relevant qualifications and certifications as assessed by the Compliance Manager.
- B. Recognition of prior learning, including at least two years' frontline travel selling experience (TSP), may be accepted at the Compliance Manager's discretion, who may request supporting evidence upon submission.
- C. Applicants in Tier 1 through Tier 5 are required to complete an ATIA-endorsed Continuing Professional Development (CPD) program every two years, focusing on the ATAS Code of Conduct and Consumer Complaints Process.

AAC RESPONSE: Accept. It was noted that clear criteria for "Recognised Industry Training" would be needed and members should be advised that CPD is included in their membership fee.

RECOMENDED ATIA RESPONSE: Accept with amendment.

ATIA RATIONALE: Replacing the Certificate III requirement with a broader "Recognised Industry Training" category, allowing the Compliance Manager to recognise relevant qualifications, and certifications. This provides more accessible pathways to attract and retain talent while maintaining high standards. The Compliance Manager will provide a published memorandum to provide guidance to the industry on what is deemed acceptable as "Recognised Industry Training".

Rather than limiting CPD to Tier 1–5 as recommended, we suggest amending the Charter so that all accredited entities must commit to biannual ATIA-endorsed CPD training. A nominated representative responsible for staff policies and procedures will complete the program, with ATIA providing the training free of charge. A mandatory biennial CPD program will further elevate the understanding of the Code of Conduct and complaint processes, reinforcing compliance and consumer protection.

BOARD RESPONSE: ACCEPT WITH AMENDMENT

Proposed Charter amendment	
Amendment S2.4(j) Page 10 Charter	<p>Currently the Charter States:</p> <p>(j) Workforce Development</p> <p>The applicant must ensure that 50 per cent of its consumer-facing staff holds a Certificate III – Travel, or equivalent</p> <p>The Compliance Manager will recognise equivalent qualifications or recognition of prior learning of at least 2 years in a front-line travel selling position (TSP) at their discretion and may request that supporting material be provided on submission.</p>

	<p>Update Charter to State:</p> <p>Workforce Development</p> <p>The applicant must ensure that 50 per cent of its consumer-facing staff <i>hold Recognised Industry Training, which may include a Certificate III in Travel, or other relevant qualifications and certifications, as assessed and approved at the discretion of the Compliance Manager.</i></p> <p>The Compliance Manager will recognise equivalent qualifications or recognition of prior learning of at least 2 years in a front-line travel selling position (TSP) at their discretion and may request that supporting material be provided on submission.</p> <p><i>All accredited entities must nominate a representative responsible for staff policies and procedures, who is required to complete an ATIA-endorsed Continuing Professional Development (CPD) program every two years, with a focus on the ATAS Code of Conduct and Consumer Complaints Process.</i></p>
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RECOMMENDATION 3



The Accreditation Fee Structure be amended to include the following new structure:

Category	TTV bands
1	Less than \$1 million
2	\$1m - \$2.5 million
3	\$2.5m - \$5 million
4	\$5m - \$10 million
5	\$10m - \$50 million
6	\$50m - \$100 million
7	\$100m - \$250 million
8	\$250m - \$1 billion
9	\$1 billion or greater

AAC RESPONSE: Accept.

RECOMENDED ATIA RESPONSE: Accept.

ATIA RATIONALE: Current Schedule of Fees spans eight tiers with Tier 5 (\$10m–\$100m TTV) being disproportionately broad, resulting in businesses at the lower end of this range being subject to fees that may not reflect their relative size and operational capacity. Introducing an additional tier for businesses with \$10m–\$50m TTV would create a fairer fee structure, support mid-sized member retention and growth, and reduce barriers to participation. If approved, this change would require a formal vote of ATIA members.

BOARD RESPONSE: **ACCEPT**

Proposed Accreditation Fee Structure Amendment	
Amendment S2.6 Page 12	<p>Currently the Charter States:</p> <p>Category One An entity with an annual TTV of less than \$1m(AUD)</p> <p>Category Two An entity with an annual TTV of between \$1m and \$2.5m</p> <p>Category Three An entity with an annual TTV of between \$2.5m and \$5m</p> <p>Category Four An entity with an annual TTV of between \$5m and \$10m</p> <p>Category Five An entity with an annual TTV of between \$10m and \$100m</p> <p>Category Six An entity with an annual TTV of between \$100m and \$250m</p> <p>Category Seven An entity with an annual TTV of between \$250m and less than \$1billion</p> <p>Category Eight An entity with an annual TTV of more than \$1billion</p> <p>Update Charter to State:</p> <p>Category One An entity with an annual TTV of less than \$1m(AUD)</p> <p>Category Two An entity with an annual TTV of between \$1m and \$2.5m</p> <p>Category Three An entity with an annual TTV of between \$2.5m and \$5m</p> <p>Category Four An entity with an annual TTV of between \$5m and \$10m</p> <p>Category Five An entity with an annual TTV of between <i>\$10m and \$50m</i></p> <p>Category Six An entity with an annual TTV of between <i>\$50m and \$100m</i></p> <p>Category Seven An entity with an annual TTV of between <i>\$100m and \$250m</i></p> <p>Category Eight An entity with an annual TTV of between <i>\$250m and less than \$1billion</i></p> <p><i>Category Nine</i> An entity with an annual TTV of <i>more than \$1billion</i></p>

RECOMMENDATION 4



ATIA take steps at the beginning of each calendar year to write to the ACCC and each of the state and territory consumer law regulators as well as each of the state and territory consumer Tribunals to advise them of the option of consumers utilising the ATIA complaints handling system. To this end ATIA should develop a brief brochure which outlines the complaints handling process and includes relevant contact information.

AAC RESPONSE: Accept.

RECOMENDED ATIA RESPONSE: Accept.

ATIA RATIONALE: ATIA notes reviewer's observation that greater awareness of the ATIA dispute resolution process among consumer regulators and tribunals could encourage consumers to utilise our scheme first, before pursuing formal complaints or Tribunal claims. By proactively engaging these bodies and providing a clear brochure, ATIA is reinforcing the Scheme's accessibility, credibility, and effectiveness in resolving consumer issues efficiently.

BOARD RESPONSE: **ACCEPT**

RECOMMENDATION 5



The independent review period for Charter Reviews be increased to every five years with the next review scheduled for 2030.

AAC RESPONSE: Accept.

RECOMENDED ATIA RESPONSE: Accept.

ATIA RATIONALE: A five-year cycle, in line with best practice for a mature scheme, provides stability, enables deeper evaluation of long-term outcomes, and reduces administrative burden, while allowing necessary enhancements between reviews.

BOARD RESPONSE: **ACCEPT**

Proposed Charter Review Process	
Amendment S3.3(a) Page 13	<p>Currently the Charter States:</p> <p>The ATIA Board will undertake an external review of the Charter and Code every 3 years.</p> <p>Update the Charter to State:</p> <p>The ATIA Board will undertake an external review of the Charter and Code every 5 years.</p>

RECOMMENDATION 6

ATIA continue discussions with CATO to explore the possibility of a re-amalgamation of their accreditation systems, particularly in relation to the provision of an independent dispute resolution process.

AAC RESPONSE: Accept.

RECOMENDED ATIA RESPONSE: Accept.

ATIA RATIONALE: ATIA remains committed to the principles established at deregulation and will continue to seek enhancements that strengthen the Scheme's credibility.

BOARD RESPONSE: **ACCEPT**

RECOMMENDATION 7

ATIA to continue undertaking targeted research into ways of raising the visibility and recognition of ATIA and the ATIA Accreditation Scheme amongst relevant stakeholders and the general public.

AAC RESPONSE: Accept.

RECOMENDED ATIA RESPONSE: Accept.

ATIA RATIONALE: ATIA remains committed to enhancing the visibility and recognition of the Accreditation Scheme and the Association among stakeholders and the public. Subject to staffing and funding, it will conduct research to further this goal and invest in broader promotion of ATIA accreditation.

BOARD RESPONSE: **ACCEPT**

SUGGESTION 1

ATIA undertake further research in relation to members implementing policies whereby they will only deal with accredited ATIA members, including seeking of legal advice and, subject to such advice, to determine whether to actively encourage members to implement such policies and to also formally notify such conduct to the ACCC.



SUGGESTION 2

ATIA undertake further research in relation to whether to seek ACCC authorisation of the ATIA Accreditation Scheme consisting of the accreditation system and disciplinary processes, including the provision of legal advice and, subject to that advice, to consult with ATIA stakeholders on the benefits and costs of seeking ACCC authorisation of the ATIA Accreditation Scheme.

AAC RESPONSE: It was questioned whether the value justified going through the authorisation process.

RECOMENDED ATIA RESPONSE: Noted.

ATIA RATIONALE: ATIA notes the two suggestions put forward by the reviewer and confirms that the Scheme continues to operate in full compliance with the law and the highest ethical standards. Each accredited business is responsible for maintaining compliance, supported by a comprehensive Code & Charter that ensures ongoing adherence to competition laws.

BOARD RESPONSE: NOTED