

# Australian Travel Industry Association (ATIA)

2025 Review: ATAS Charter, Code of  
Conduct & ACAC Terms of Reference

## Summary and recommendations

The Australian Travel Industry Association (ATIA) provides this submission for the 2025 review of the Australian Travel Accreditation Scheme (ATAS).

ATIA is the administrator of ATAS and believes in continual improvement and transparency. The Compliance Manager is provided the opportunity to independently make a public submission to the reviewer. ATAS is the largest and most representative accreditation Scheme for travel businesses in Australia. ATIA has almost 1,700 ATAS-accredited member locations throughout Australia. Businesses that are deemed to meet the standards of ATAS are permitted to use the ATIA accredited designation.

ATIA is the peak body for Australia's travel businesses and represents the \$69 billion travel Industry. Our membership base includes the full spectrum of travel intermediary businesses across Australia including retail, corporate and online travel agents, tour operators, wholesalers and consolidators. Our members range in size from the largest listed organisations such as Flight Centre, Helloworld, Corporate Travel Management and Webjet, through to small independently owned and operated travel businesses. 92% of ATIA members are small businesses.

ATIA makes the following recommendations for the 2025 Review of the ATAS:

### Recommendation 1:

Introduce an additional Membership Tier to the Associations Constitution. The new tier splits the existing category 5 into two; Tier 5: \$10M-50M TTV and new tier 6: \$50M-\$100M TTV.

To ensure a more equitable structure and a more sustainable participation, ATIA is proposing an update to its membership tier structure—introducing a new mid-range tier to better reflect the size and capacity of businesses with a Total Transaction Value (TTV) between \$10 million and \$100 million. This change will particularly benefit mid-sized businesses that are currently grouped into a disproportionately broad tier. By aligning fees more closely with business scale, the revised structure strengthens the Scheme by supporting member retention, encouraging growth, and removing unnecessary financial barriers for engagement.

### Recommendation 2:

Remove mandatory requirement of PL insurance from those not operating face to face businesses. Also remove mandatory requirement PI for land supply members.

In response to Industry feedback and the evolving ways travel businesses operate, ATIA recommends updating insurance requirements to ensure they are fit-for-purpose, cost-effective and proportionate to actual risk. This change would make Public Liability Insurance optional for businesses that operate remotely without public-facing premises and remove the mandatory requirement for Tour Operators to hold Professional Indemnity Insurance—given its limited relevance and low claims history in that sector. These refinements strengthen the Scheme by promoting fairness, reducing unnecessary cost burdens and recognising the diverse risk profiles of different business models, while still maintaining appropriate consumer protections through active declarations and tailored insurance coverage.

### Recommendation 3:

Update Section 3.3(a) of the ATAS Charter to:

*The ATIA Board will undertake an external review of the Charter and Code every 5 years.*

Greater stability reduced administrative burden and deeper insights into long-term outcomes are the key benefits of ATIA's recommendation of moving to a five-year Charter review cycle. As the Scheme has matured and its core principles have remained consistent, a longer review interval better supports strategic planning, reflects best practice and allows for more meaningful improvements. This change ensures the accreditation remains effective, relevant, and responsive without the need for frequent re-evaluation of its foundations.

### Recommendation 4:

Update Section 2.5(j) Work Force Development to read:

*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. 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. 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.*

To support ongoing professionalism and better reflect the diversity of the modern travel workforce, ATIA proposes replacing the Certificate III requirement with a broader category of "Recognised Industry Training"—allowing the Compliance Manager to assess and recognise relevant qualifications, certifications, or experience.

This shift strengthens the Scheme by enabling businesses to attract and retain talent through broader, more accessible pathways while maintaining high standards. In addition, a mandatory Continuing Professional Development (CPD) program—requiring staff across tiers 1 to 5 to complete an ATIA-endorsed course or seminar every two years—will ensure consistent understanding of the Code of Conduct and consumer complaint processes, reinforcing commitment to quality, compliance and consumer protection.

## Background

Administered by ATIA, the Australian Travel Accreditation Scheme (ATAS) was introduced in 2014 as a voluntary industry accreditation Scheme to self-regulate those entities that were previously regulated by the State and Territory Governments.

The ATAS Charter is the governance document for the accreditation Scheme and below is a summary of it and the attachments.

All businesses that are members of ATIA must be accredited, however businesses can elect to be accredited and not a member of ATIA. If a business elects to not be a member of ATIA, they still must abide by all rules that govern the Scheme.

ATAS Charter	<ul style="list-style-type: none"><li>• The ATAS Charter is one governance document which includes the 3 below attachments.</li><li>• Lists Eligibility Criteria to become an ATAS Participant</li></ul>
ATAS Code of Conduct	<ul style="list-style-type: none"><li>• Attachment A</li><li>• Details obligations to consumers (consumer facing)</li><li>• Details the 3 stage ATAS Complaint Management Process</li></ul>
Solvency Definition	<ul style="list-style-type: none"><li>• Attachment D</li><li>• Lists Financial Ratios used in financial assessments as required by the ATAS Charter.</li></ul>
ACAC Terms of Reference	<ul style="list-style-type: none"><li>• Attachment F</li><li>• Governance document for how the ATIA Complaint Appeal Committee operates</li></ul>

## Progress since the last review.

Since the last review, ATIA has continued to implement our commitment to continuous improvement. This has led to adjustments to the Scheme that strengthen industry engagement and consumer outcomes that collectively improve the efficiency and effectiveness of the Scheme. These include:

- 2023 – Recognition of non-economic loss within the consumer dispute resolution process
- 2024 - Homebased independent contractors can now be accredited in their own right
- 2025 – Pathway for members to elect an independent external assessment of their financial statements in place of an internal review
- 2025 – Launch of an updated consumer facing website ([www.traveltick.com.au](http://www.traveltick.com.au))

The establishment of the Accreditation Advisory Committee (AAC) has been a significant asset to growing Industry acceptance of the Scheme while providing real world insights that the ATIA compliance team has used to improve their activities.

ATIA has not been in a position to fully deliver on recommendation 3 of the 2022 review which was to extend membership of the Advisory Committee to include consumer representation. There have been a number of external factors contributing to this and we remain committed to this outcome in the near future.

## ATIA Compliance Manager Recommendations

### Updating of the membership tier fee structure

The current Accreditation Schedule of Fees is comprised of eight tiers, ranging from businesses with less than \$1 million in Total Transaction Value (TTV) through to those with over \$1 billion. These are determined by the Constitution of the Association. A member's annual accreditation fee is based on their TTV from the previous financial year and the number locations in which they operate.

Tier 5, covering businesses with an annual TTV between \$10 million and \$100 million, spans a particularly wide range. This tier is 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. The Schedule of Fees could be amended to introduce an additional membership tier specifically for businesses with an annual Total Transaction Value (TTV) between 10 million and \$50 million.

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

This refinement will promote a fairer fee structure, support member retention and growth and encourage engagement from mid-sized businesses by reducing potential barriers to entry and ongoing participation. This change, if accepted by the reviewer and Board, will require a formal vote of the ATIA membership.

#### Recommendation 1

Introduce an additional Membership to the Associations Constitution. The new tier splits the existing category 5 into two; Tier 5: \$10M-50M TTV and new tier 6: \$50M-\$100M TTV.

### Insurances that provide benefits to consumers and businesses

Section 2.5 (i) of the Charter states that all applicants must provide current certificates for Public Liability and Professional Indemnity insurance policies. This has been in place since the inception of the Scheme and mirrored the then licenced environment.

#### Public Liability

Over the past 10 years the industry has undergone significant disruption and innovation in how it engages with consumers. With the growth of homebased agents / independent contractors and limited claims by land supply members, greater flexibility is required to be provided to the compliance manager regarding insurance requirements.

In drafting this submission we believe that the overall public benefit of Public Liability Insurance is minimal where travel intermediaries

- do not engage in in-person client interactions,
- do not deliver services directly, and
- do not operate from publicly accessible premises.

This finding reflects the low-risk nature of these business models who operate remotely, conduct all business online or over the phone and do not have physical premises open to the public. For such

operators, Public Liability Insurance could impose a disproportionate cost burden and offers minimal risk mitigation benefit.

An increasing number of inquiries from Industry, particularly in the homebased agents / independent contractors segment, have questioned the relevance of this requirement. Making this requirement optional would better align with fairness and flexibility without compromising consumer or industry protection.

It also recognises the diversity of business types within the Industry and supports the ongoing viability of small and niche operators. Active declarations would be required as part of the renewal process to ensure those businesses that change their business model have the relevant insurance protections.

### **Professional Indemnity**

Through consultation with land supply businesses and those across the insurance Industry, the benefit offered by Professional Indemnity insurance (PI), is outweighed by the necessity of PL insurance. PI claims from Tour Operators are infrequent, so much so that one broker confirmed they had received zero PI claims from Tour Operators in the past 5 years.

When Tour Operators do make claims for errors they will generally rely on the “Errors and Omissions” clause within their PL insurance policies — further supporting that a standalone PI policy is not always vital in this context. PI remains appropriate for most travel agencies and consultants as they provide travel advice and booking services on behalf of third parties. This coverage is less applicable to businesses that operate and deliver their own tours directly to consumers.

Removing this requirement for Tour Operators recognises the unique risk profile of these businesses, which typically have direct control over the tour services provided and therefore face different liability exposures compared to those businesses that act as travel agents.

### **Recommendation 2**

Remove mandatory requirement of PL insurance from those not operating in person businesses. Also remove mandatory requirement PI for land supply members

## **Frequency of Charter Review**

ATIA recommends amending the Charter review frequency from every three (3) years to every five (5) years to match with current best practice for established regulations and codes. As the accreditation Scheme has matured, the core governing principles have remained largely consistent over the past two review cycles.

Between formal review periods the Association has made enhancements to eligibility and enhancements to the ACAC powers following requests to do so. ATIA has shown a commitment to enhancing the Scheme to ensure continuing relevance to both industry and consumers. This proposed change better aligns with strategic planning cycles and allows for a more meaningful assessment of long-term outcomes and the impact of previous Charter reviews.

Given this maturity a five-year review cycle is more appropriate. The foundational aspects of the Scheme do not require re-evaluation on a triennial basis. A longer review interval will promote greater stability, enable deeper insights and reduce administrative burden while ensuring the Scheme remains effective and responsive to future needs.

### **Recommendation 3**

Update Section 3.3(a) of the ATAS Charter to read:

*The ATIA Board will undertake an external review of the Charter and Code every 5 years.*

## Training requirements for Accredited businesses.

Under section 2.5(J) of the Charter, businesses that are accredited must ensure that 50 per cent of its consumer-facing staff holds a Certificate III – Travel or equivalent. 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.

Following the pandemic the Industry has had to invest in new pathways to attract, train and retain a workforce that delivers on the needs for our clients and businesses. The existing mandatory Certificate III requirement is no longer considered the only pathway in which people can enter the Industry in the same way it was 10 years ago.

Another significant driver of a move away from this program was the lack of consistency across federal and state government training programs that has made it difficult for the Industry to engage with training providers. Cert III also does not provide an appropriate training outcome for those businesses that operate a business type beyond a travel agent or advisory service.

To better serve the diversity of the travel Industry the Certificate III should be replaced with a broader category of Recognised Industry Training, which the Compliance Manager will continue to evaluate and accept at their discretion, allowing flexibility to recognise relevant qualifications, certifications or practical experience

To continue our focus on elevating standards across the Industry, ATIA will commit to a staged roll out of Continuing Professional Development Program based on increasing the knowledge and understanding of Code and Charter. The majority of staff within accredited businesses should be required to complete an ATIA-endorsed online course or attend a seminar every two years that focuses specifically on the Code of Conduct and Consumer Complaints Process, ensuring consistent knowledge and application of Code requirements.

This requirement would be mandatory for all tiers (Tier 1 through Tier 5) to guarantee ongoing commitment to best practice, adherence to the Code of Conduct and consumer protection.

### Recommendation 4

Update Section 2.5(j) Work Force Development to read:

*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. 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.*

*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.*