

ATIPAC

Air Travel Insolvency Protection Advisory
Committee

Annual Report 2020 – 2021

July 2021

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Enquiries regarding the content of this publication should be sent to:

E-mail: atipac@caa.co.uk

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Introduction from the Chair



Dear Secretary of State,

This is one of the most important annual reports which ATIPAC has submitted in its history.

The function of ATIPAC is to advise the Secretary of State on financial protection of air travellers. The main components of financial protection for air travellers are:

- an appropriate regulatory regime for consumer protection
- affordable and effective travel insurance for eventualities not covered by regulations
- a thriving and competitive travel industry with low risk of company failure.

All of these have been undermined and/or shown to be inadequate by the pandemic. It is well known that international travel, and the businesses which provide it, have been badly affected by COVID-19 and the changing destination, testing and quarantine rules. We believe now is the time to “build back better” and address pre-pandemic problems too. Government action is needed to restore opportunities for people to book holidays, educational trips and visits to family abroad with minimal financial risk.

Why is this important? Travel is important to people’s wellbeing and to the economy. According to research commissioned by ABTA, the outbound travel sector directly sustains over 220,000 UK jobs, and UK domestic expenditure on outbound travel was over £45bn in 2017 ([Driving Growth 2019 11042019.pdf \(abta.com\)](#)).

Fortunately, there is a basis to build on, for example: Brexit has provided an opportunity to review the Package Travel Regulations; the Civil Aviation Authority is already consulting on reforms to the ATOL scheme; DfT’s Airline Insolvency Review of 2019 could be picked up. Responsibility for aspects of international travel and related consumer protection is spread around government departments. Nonetheless ATIPAC urges the Government to address the problems highlighted in our annual report holistically.

Yours sincerely,

Sandra Webber

ATIPAC Chair

1 The Role of ATIPAC

- 1.1 The Air Travel Insolvency Protection Advisory Committee was created by the Secretary of State for Transport in 2000 to provide informed advice to Government on financial protection of air travellers and customers booking with air travel organisers.
- 1.2 The Committee is devoted to furthering the interests and financial protection of air travellers. The Committee, which meets on a quarterly basis, has an independent Chair, and its membership is uniquely balanced between trade, regulator, passenger representatives and independent members, with a breadth and depth of knowledge and experience from all areas of the travel industry.
- 1.3 Given the diversity of its membership, it is not possible for the report to cover all points of view, however, the report reflects the viewpoint of the majority of members. It should also be noted that although the Committee's Secretariat function is provided by the CAA, the report does not necessarily reflect the CAA's own position.

2 Overview of the Last Twelve Months

- 2.1 The Committee's last report was published when the pandemic was in its relatively early stages and its potential impact unknown. At that point, the travel sector was in the midst of recovering from the impact of Thomas Cook's failure, and the uncertainties over how travel would look post-Brexit. Since then the pandemic has dominated the Committee's discussions. We expand on this below.
- 2.2 In terms of membership, Uday Dholakia and Alisdair Luxmoore have stepped down after several years of valuable contributions, and the latter has been replaced by Noel Josephides to represent the trade association AITO.
- 2.3 Over the last year, the Committee's meetings have been regularly attended by Department for Transport (DfT) officials. The Committee also hosted a discussion with several Government departments to highlight the issues faced by the industry and the impact these had on consumers. The Committee would like to express its thanks for the time and engagement offered by Government.

3 Covid-19 Pandemic

Impact on travel businesses

- 3.1 As mentioned in the Chair's introduction, the financial protection of air travellers depends substantially on a thriving and competitive travel sector with minimal risk of company failure. During the year 34 ATOL-licensed companies failed (the largest number for many years) and following the September 2020 and March 2021 renewal periods, a significant number of businesses decided against renewing their licence¹.
- 3.2 The pressures that many businesses have faced with the cessation of travel have been eased through the support arrangements offered by Government. The introduction of

¹ <https://www.caa.co.uk/News/UK-Civil-Aviation-Authority-Statement--ATOL-Renewals/> & <https://www.caa.co.uk/News/ATOL-SPRING-2021-RENEWALS/>

the furlough scheme, as well as loans such as Coronavirus Business Interruption Loan Scheme (CBILS) have been crucial in ensuring that companies with no other source of income have continued to operate. However, some of these may not survive a second summer disrupted in 2021. And if this financial support were to cease in September 2021 as planned, or before international travel resumes at scale, then many businesses could fold. In the short term this could create disruption for consumers and potentially more support required from the Government in the event that the ATT were unable to absorb the costs. In the medium term it could lead to a reduction in choice for consumers.

- 3.3 Of course, the Committee appreciates that fast-paced public health decisions need to be taken. However, last minute changes to Travel Advice serve to create market conditions that are likely to be associated with a higher level of travel organiser insolvency. The short notice changes have created a great deal of confusion for consumers and practical difficulties for the travel industry in assisting those who wish to re-book or, in some cases, need to travel. We note the Global Travel Taskforce's statement that the Government should take steps to help build clarity and confidence for consumers looking to travel², but at the time of writing the Committee questions whether this has been achieved. Although not intended, the introduction of the traffic light system, in addition to Travel Advice, has created confusion over what travel requirements are in place.

Consumer protection regulations

- 3.4 Holiday companies and airlines are obliged by law to refund customers if they (the business) cancel the trip. The need to cancel trips in response to travel restrictions meant that travel businesses (both package providers and airlines) needed to provide refunds on an extraordinary scale. This created pressures for businesses in all parts of the travel supply chain. Many businesses had insufficient capital to provide all consumers with refunds and, in some cases, airlines delayed in paying agents promptly, who were then unable to pass the refund on to the consumer.
- 3.5 All of this meant that despite there being legal requirements to provide refunds within 14 days for packages and 7 days for airline tickets, many businesses struggled to meet these obligations to consumers. This resulted in the Competition & Markets Authority launching investigations into some travel businesses and seeking undertakings from others³. The CAA also undertook its own investigations in respect of airlines⁴. Although published outside of the reporting period, the Committee welcomes the announcement in the Global Travel Taskforce report that the CAA will be given stronger enforcement powers to take action against airlines where they breach the rights of consumers⁵.
- 3.6 Conscious of the severe cashflow problems that could arise from providing refunds, but receiving no new bookings, many businesses started offering vouchers or refund credit notes (RCNs). These would enable consumers to redeem the value of the voucher against a future booking or receive a full cash refund at a future point in time. The consumer is not obliged to accept RCNs and remains entitled to a cash refund if they wish. At the time of writing, based on the information provided by ATOL holders,

² [Report of the Global Travel Taskforce](#), p15

³ <https://www.gov.uk/cma-cases/covid-19-cancellations-package-holidays?=0>

⁴ <https://www.caa.co.uk/News/UK-Civil-Aviation-Authority-reports-on-airline-refunds-review/>

⁵ [Report of the Global Travel Taskforce](#), p16

the CAA estimates that the value of outstanding ATOL protected RCNs is £230m⁶. Some consumers may have thought this was the only option, while others were happy to support their supplier. The Government and Air Travel Trust (ATT) took steps to ensure that these RCNs were protected by the ATOL scheme should the issuing business become insolvent before they were redeemed. There had been uncertainty over how long this protection would apply; however, in April 2021 the ATT announced that ATOL protection of RCNs would remain in place until the end of September 2022.⁷

- 3.7 The whole RCNs initiative was outside the consumer rights framework which provides for refunds within a short period and was not designed or fit for a lengthy global pandemic. For example, passengers have no right to refunds if they cancel for a range of legitimate pandemic-related reasons such as fear of catching the disease; the cost of post-booking testing requirements for a family; and inability to comply with post-booking quarantine requirements because they need to go back to work. The Government should review whether consumer protection is adequate for future public health emergencies, bearing in mind that regulation which increases holiday costs risks pushing consumers towards less regulated travel options.

Travel insurance

- 3.8 The pandemic has also raised concerns over the cover provided by insurance policies, particularly where consumers have cancelled trips on the basis of changes to Government advice⁸. Many travel insurance policies refer to Foreign, Commonwealth and Development Office (FCDO) advice but *Traffic Light* advice was issued by the Department for Transport, and there is also advice on school trips from the Department for Education. Insurers may not consistently count these as FCDO advice which could cause confusion.
- 3.9 Where FCDO advice has warned against travel, many consumers will naturally seek to rebook or cancel trips, as there could be a risk of invalidating their travel insurance policy. However, some businesses have refused to provide refunds on the basis that flights, or some other element of the trip could still go ahead as originally planned. Ultimately this sends a confusing message to consumers and runs the risk of leaving them out of pocket.
- 3.10 With the difficulties that arose at the start of the pandemic, some members of the Committee feel that the insurance industry took a step back from paying out on policies where it could be argued that the criteria for payment had been met. In protecting themselves, insurance companies left travel businesses exposed to the full range of costs associated with fulfilling refund obligations. The lack of insurance protection, despite the payment of premiums, has had a significant impact on the travel industry. In effect, this leaves the travel industry as the insurer of last resort rather than the insurance industry.
- 3.11 Finally, travel industry representatives advise that there is insufficient availability of suitable insurance products for businesses as international travel aims to restart. These problems with the availability and performance of insurance products make it

⁶ The figure quoted is reliant upon the reporting to the CAA to be complete and accurate and while this has been subject to some checks this data is not subject to separate third-party assurance.

⁷ [Report of the Global Travel Taskforce](#), p16

⁸ <https://www.bbc.co.uk/news/business-57471106>

harder for the travel industry to protect itself against the risks created by its unavoidable legal obligations to consumers and may lead to a higher risk of insolvency.

- 3.12 Although outside the remit of the Secretary of State, the Committee encourages Government, and the insurance and travel industries to work together to find a workable solution so that clarity can be offered to consumers.

4 Airline Insolvency

- 4.1 The Committee welcomes the CAA's statement of priorities which re-emphasises a commitment to work with Government on implementing the implementation of an airline insolvency regime⁹.
- 4.2 We acknowledge that the context in which the Airline Insolvency Review's work was initially published has changed, and given the current uncertainty around overseas travel, it seems unlikely that a large-scale repatriation exercise will be necessary in the near future. Nevertheless, the Committee believes that there is merit in developing a regime that protects consumers and has the potential to reduce costs to the taxpayer if an airline were to fail in future, not least because the financial impact of the pandemic has left the industry weakened.
- 4.3 The Committee remains ready to engage with Government and the CAA in taking this work forward but, as noted below, believes that a more co-ordinated approach to reform should take place.

5 ATOL Reform

- 5.1 The Committee notes the publication of the CAA's consultation on ATOL reform¹⁰, in particular the segregation of customers' advance payments so that they can be refunded in the event of holiday company failure before the holiday takes place. In the wake of the Thomas Cook failure, and the pandemic, it is imperative that steps are taken to ensure travel businesses are more financially robust. However, due to the impact of these events on the industry, the Committee believes that any changes must be phased in over a manageable period of time.
- 5.2 The Committee emphasises that the CAA can only prevent the use of customer money as working capital for air package holidays, but the risk applies equally to airlines. Insofar as package organisers buy flights on behalf of their customers, airlines and travel organisers are part of the same travel ecosystem, especially as regards the cash used to pay for flight seats. We believe that a more holistic approach to reform of the travel sector is needed, including the use of consumer money by airlines.

⁹ [Letter of reply to Secretary of State Priorities for the Civil Aviation Authority from the CAA Chair, January 2021](#)

¹⁰ [ATOL Reform: Assessment of Funding Arrangements and the Protection of Customer Money](#)

6 The UK's Relationship with the European Union

- 6.1 Due to international travel restrictions, few consumers will have travelled to the EU, or experienced any changes arising from the end of the UK's transition period.
- 6.2 Similarly, for travel businesses, many will not have had the opportunity to explore the new trading landscape. The key change is that the arrangements for selling packages across borders have reverted to the way they were prior to implementation across Europe of the Single Market measures in the European Package Travel Directive: that is, ATOL will not now protect sales across the European Economic Area (EEA), and EEA-established businesses must hold an ATOL to sell air packages in the UK.
- 6.3 As the Committee has discussed in previous reports the UK's departure from the EU presents challenges, but it also offers opportunities. There is now the possibility to assess whether the Package Travel Regulations are fit for purpose. We believe that the need for such a review has been heightened by the impact of Covid-19, particularly in relation to the 2-week timeframe for providing consumer refunds. Also, the Committee has indicated in previous reports that linked-travel arrangements were not well understood either by consumers or industry. The lack of understanding regarding linked-travel arrangements has also been acknowledged by the European Commission¹¹.

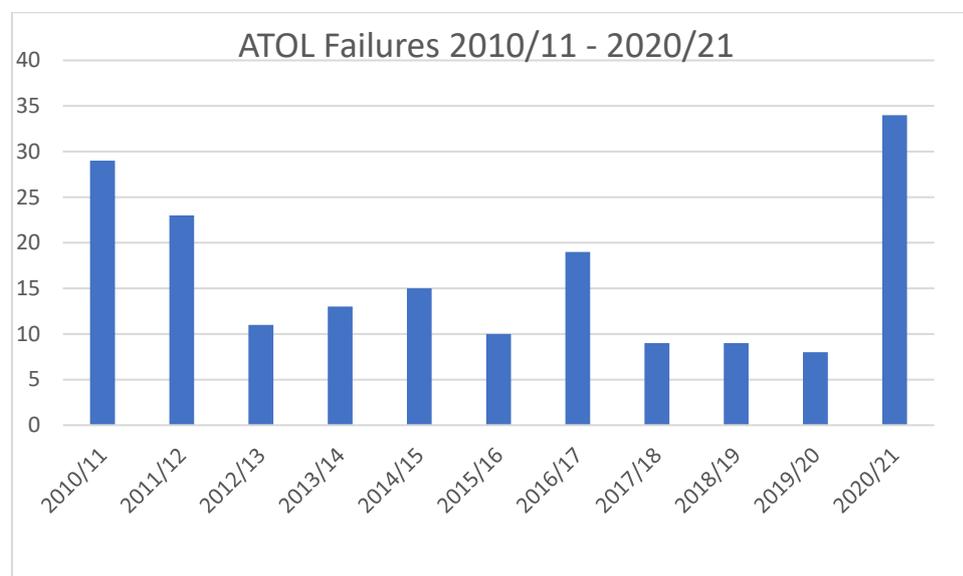
7 Conclusion

- 7.1 Although the pandemic is not yet over, the travel industry and Government and associated sectors must work together to ensure that in future consumers can travel safely and with confidence, and that all elements of the travel industry operate on a sound and competitive footing.
- 7.2 Within the package travel sector, businesses are affected by decisions made by the DfT; Department for Business, Energy, Innovation and Skills (BEIS); Department for Digital, Culture, Media and Sport (DCMS); FCDO; Treasury (in respect of insurance matters); as well the CAA. As a direct result of the pandemic, there is also involvement from the Department of Health and Social Care (DHSC). Ideally this should be simplified or coordinated to interact with the travel sector.
- 7.3 The Committee would like to see an overarching piece of work to ensure that the key players in the travel industry are licensed and regulated in an appropriate and consistent manner.
- 7.4 The Committee is aware that there will be many demands on Government time over the coming months but as with several other industries, the travel sector has effectively been at a standstill for over a year. The reopening of international travel, combined with appropriate reform will help the travel industry recover this lost time and deliver economic benefits to the UK, and once again offer consumers the enjoyment of trips overseas.

¹¹ [Report from the Commission to the European Parliament and the Council on the Application of Directive \(EU\) 2015/2302 of the European Parliament and of the Council on Package Travel and Linked Travel Arrangements](#)

Appendix A – ATOL Holder Failures

The chart shows the number of ATOL holder failures from 2010 - 2011 to 2020 - 2021.



To the end of March 2021, there were thirty-four ATOL holder failures. This compared with eight failures in the previous reporting period.

ATOL Holder Failures 1st April 2020 – 31st March 2021

Date of Failure	ATOL Holder	Consumers Affected (estimate)	ATOL Number
27/04/2020	Paragon Sports Management Ltd	80	6724
29/04/2020	Colouricious Ltd	-	10830
08/05/2020	Enjoy Travel Ltd	900	6227
13/05/2020	On Tour Travel Ltd	200	9217
22/05/2020	Shearings Holidays Ltd	2,400	1666
29/05/2020	Jacada Travel Ltd	20	9761
03/07/2020	Pan Express Ltd	1,900	5682
13/07/2020	Fleetway Travel Ltd & Fleetway Aviation Ltd	15,000	2748
16/07/2020	David Urquhart Sky Travel Ltd & David Urquhart Sky Transport Ltd	1,300	3701
21/07/2020	South Quay Ltd	500	4619
21/07/2020	Viceroy Travel Ltd	15	11018
27/07/2020	Christopher Pollard Tours	-	10256
04/08/2020	Harris Holidays Ltd & Harris Holidays Transport Purchasing Ltd	850	6624
21/08/2020	STA Travel Ltd	32,000	3206
07/09/2020	Cities Direct Ltd & Cities Direct Transport Ltd	430	5501
21/09/2020	Gendai Travel Ltd	<5	4192
01/10/2020	E Thornton & Son Ltd	<10	3452
09/10/2020	Go Travel Ltd	-	6928

19/10/2020	The Independent Traveller Ltd	15	5912
03/11/2020	The Flash Pack Ltd	180	11200
05/11/2020	Strandtown Travel Ltd	150	11029
10/11/2020	Courtney Airsavers Ltd	70	5711
16/11/2020	Horncastle Executive Travel Ltd	-	75244
18/11/2020	APS Select Ltd	4,000	3556
09/12/2020	Alpine Elements Ltd & Elements Services London Ltd	5,100	6435
22/01/2021	Skylink Travel Ltd	115	9839
02/02/2021	Tucan Travel Ltd	-	6855
17/02/2021	Oasis Overland Ltd	-	9339
08/03/2021	Strand Travel Ltd	60	5429
12/03/2021	Silver Ski Holidays Ltd	-	2093
12/03/2021	Baxter Hoare Travel Ltd	445	2975
29/03/2021	Williams D (Scuba en Cuba)	70	5242
29/03/2021	Ace Point Travel Ltd	-	9037
30/03/2021	Travel Day Ltd	2,600	9246

Appendix B – Constitution and Terms of Reference

Establishment and Role of the Committee

1. The Air Travel Insolvency Protection Advisory Committee ("the Committee") is established by the Secretary of State for Transport to advise on the financial protection arrangements for air travellers and customers of air travel organisers.

Composition of the Committee

2. Members of the Committee shall be drawn from members and/or officers of organisations representing various market sectors of the travel trade and independent representatives. The Chair and Deputy should always be independent representatives.

Trade

There will be up to ten members representing travel agents, tour operators, third party protection arrangers and airlines. Appointments shall be made in consultation with relevant trade associations. Each of the following trade associations and/or their successor bodies shall always have the right to be represented by one member:

Association of British Travel Agents (ABTA)
Association of Independent Tour Operators (AITO)
Association of Airline Consolidators (AAC)
Board of Airline Representatives in the UK (BAR UK)
Travel Trust Association (TTA)

Independent members

There will be up to ten independent members of whom one will be Chair. These members will include at least three consumer representatives and three representing consumer-focused organisations.

Civil Aviation Authority

The Chair of the Air Travel Trust, and one other member of the Civil Aviation Authority.

Appointments to the Committee

3. Members shall be appointed by the Chair of the Civil Aviation Authority (CAA), for periods specified at the time of appointment. Membership periods should normally be periods of 4 years. Members may resign at any time. The CAA Chair will consult the Chair of the Committee before appointing Members other than from the CAA.

4. Where an organisation is invited to provide a representative, then alternates should be nominated, in order that the organisation's views and contribution to the Committee's deliberations may at all times be made. Where the appointment is in their personal capacity, then alternates are not appropriate.

5. If the Chair of the CAA is satisfied that a member has been absent from meetings of the Committee for more than three consecutive meetings or is satisfied that a member is otherwise unable or unfit to discharge the functions of a member of the Committee the membership may be declared vacant.

Meetings of the Committee

6. The Committee shall determine its own procedures for and frequency of meetings, including any requirement for a quorum.

7. The Chair may set up working groups to consider and report on specific issues. Although such groups will normally be made up of Committee members the Chair may appoint others with particular expertise at his discretion.

Duties of Committee

8. The Committee shall keep under review and from time to time advise the CAA, the Trustees of the Air Travel Trust and the Secretary of State for Transport on the arrangements for the financial protection of air travellers and customers of air travel organisers.

9. In particular it shall:

- advise the Trustees, the CAA and the Secretary of State on policies they should pursue to protect consumers;
- advise the CAA and the Trustees on payment policy and the use of their discretion when making payments from the Trust (The Payment Policy);
- advise the CAA how they can promote awareness of ATOL protection to consumers and consumer expectations of protection;
- advise on agreements between the Trustees, the CAA and third parties such as credit card companies where there are no commercial sensitivity issues;
- advise on current market conditions, emerging market trends and, where appropriate, their potential impact on consumers and the financial protection arrangements; and
- advise the CAA and the Trustees on the financial viability of the ATT.

10. The Committee shall submit to the Secretary of State an Annual Report on its activities in each year ended 31 March within four months of the end of that year. The Committee shall draw to the Secretary of State's attention at any time matters of concern on which, in its view, action is necessary.

Administrative Arrangements

11. Reasonable out of pocket expenses directly incurred by Members of the Committee in attending meetings shall be reimbursed by the CAA.

12. The CAA shall provide administrative support to the Committee.

Issued by:

The Department of the Environment, Transport and the Regions April 2000

Amended by the Department for Transport July 2006

Amended by the Department for Transport September 2014

Appendix C - ATIPAC Members

Sandra Webber

Independent Representative and Chair

Sandra has been ATIPAC Chair since July 2018. Until recently she was also the Chair of the Water Alternative Dispute Resolution Panel which provides oversight of the water industry consumer redress scheme. She previously served as Director of Consumer Support at the CAA and before this worked at the Department for Transport where her responsibilities included aviation and the ATOL protection scheme.



Alan Bowen

Industry representative

Alan qualified as a solicitor in 1982 and, after a number of years in private practice, joined ABTA as Head of Legal Services. For the last 20 years he has been the Managing Partner of AGB Associates which specialises in advising the travel industry. He represents the Association of ATOL Companies (AAC).



Roger Bray

Independent representative

Roger is one of the UK's longest serving travel journalists and a former travel editor of London's Evening Standard. He was a passenger on Concorde's first commercial flight, covered the rise and fall of Laker Airways, various air disasters and the after effects of 9/11. He is the co-author of *Flight to the Sun* which explores the expansion of mass package tourism.



Jan Carton

Consumer representative

Jan joined Citizens Advice as Senior Consumer Expert in March 2016. Previously she had spent 13 years as a self-employed Consumer Law Consultant, mainly providing training in a variety of consumer law subject areas to trading standards professionals, ADR providers, consumer advisers and government departments. This was preceded by careers in local government trading standards and as a senior lecturer in consumer law at Manchester Metropolitan University.



Marykay Fuller

CAA representative

Marykay Fuller was appointed to the Board as a Non-Executive Director in January 2019. She is Chair of the Air Travel Trust Fund, and also serves as a member of the CAA Audit Committee, and CAA International Ltd Management Advisory Board. Marykay's executive career was in finance and consulting and she is a former senior advisory partner at KPMG LLP. Earlier in her career, she also worked for the US Government where she worked on numerous US airline restructurings and represented the Corporation on the National Airline Commission.



Prof. David Grant

Independent representative

David is Emeritus Professor of Law at Northumbria University. He is the co-author of Holiday Law (Sweet & Maxwell) with Stephen Mason and Simon Bunce. He has written and lectured extensively on travel law.



Noel Josephides

Industry Representative

Noel is Chair of Sunvil Holidays Ltd. He represents the Association of Independent Tour Operators (AITO), of which he is a Director. He is also the Chair of the ABTA membership committee.



Dale Keller

Industry representative

Dale is the Chief Executive of the Board of Airline Representatives in the UK (BAR UK). He has 25 years' experience in the aviation, travel and tourism industries. He represents BAR UK on the Committee.



Gary Lewis

Industry representative

Gary became Chief Executive Officer of The Travel Network Group in early January 2016 following a successful management buyout of the Group. He was instrumental in delivering the first CAA Franchise arrangement in 2003 which still today provides the basis for Travel Trust Association Members to gain individual ATOL membership.



Joel Reindorp

Industry Representative

Joel is Senior Legal Advisor at easyJet where he is responsible for commercial and consumer-related legal matters. He previously served in the legal team at Monarch Airlines, gaining key insight into the industry regime. He advised both in private practice and in-house prior to his move into airlines



Keith Richards

Independent representative

Keith is a barrister, arbitrator and commercial mediator. He is Chair of the Disabled Persons Transport Advisory Committee at the DfT, a Panel Member at the Competition and Markets Authority, and a member of the Financial Services Consumer Panel at the FCA. He previously served as Head of Business and Professional Development and Consumer Affairs at ABTA, and as Chair of the CAA Consumer Panel.



Mandy Round

Industry representative

Mandy has held varied roles in the travel industry for over 30 years, including General Manager at easyJet Holidays, Client Services and Tourism Director at Sambala Resort, Cape Verde, General Manager at Jet2holidays and Director of EMEA for the Hong Kong Tourist Board. She is currently Senior Vice President of Airline Tour Operations for the LogiTravel Group based in Mallorca.



Paul Smith

CAA representative

Paul was appointed to the board as Group Director of Consumers and Markets on 24 May 2018. Before joining the CAA, he was the Head of Policy at the Payment Services Regulator, part of the UK's Financial Conduct Authority, since January 2016. Paul has also previously held the position of Chief Executive of the Australian Energy Market Commission as well as a number of senior positions with Ofgem and Ofcom.



John Snyder

Industry representative

John qualified as a Solicitor in 2000 and after secondments to various businesses such as B&Q plc, Superdrug plc and Virgin, he joined Carnival plc in 2004 where he is now General Counsel. Carnival is the largest cruise operator in the world and John's role includes dealing with legal issues relating to the operations of P&O Cruises, Cunard, Princess Cruises, Holland America Line and Seabourn cruise brands.



Bruce Treloar

Consumer representative

Bruce is the Chartered Trading Standards Institute's Lead Officer for the Holiday & Travel Industry with 41 years of experience as a practising trading standards officer.



Rochelle Turner

Consumer representative

Rochelle has been working in senior consumer, market, economic and policy research roles in the travel industry for over 20 years including roles at Ipsos MORI, TUI, Which? and the World Travel & Tourism Council. She is currently Head of Research & Insight for MaCher, a B Corp and supplier to companies within the tourism industry. Rochelle is also a trustee of the Travel Foundation.



John de Vial

Industry representative

John is Special Adviser to the Chief Executive at ABTA, a Director of ABTA Insurance PCC Limited and also a Director of Travelife Limited – sustainability in tourism for hotels. He is a Trustee of three industry charities: The Travel Foundation, the Family Holiday Association and ABTA LifeLine, the benevolent charity for past and present industry employees.

**Kirsteen Vickerstaff**

Industry representative

Kirsteen is General Counsel and Company Secretary at On the Beach Group plc, where she has responsibility for legal, company secretarial, regulatory, risk management and insurance matters. On the Beach is one of the UK's leading online travel agents, specializing in beach holidays and is listed on the London Stock Exchange.

