

Guidance in Support of ATOL Standard Term 1.3: ATOL Advertising Requirements

CAP3236

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Civil Aviation Authority
Aviation House
Beehive Ring Road
Crawley
West Sussex
RH6 0YR

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Introduction

1. This document was developed pursuant to ATOL Standard Term 1.3, that came into force on 1st April 2026, which states:

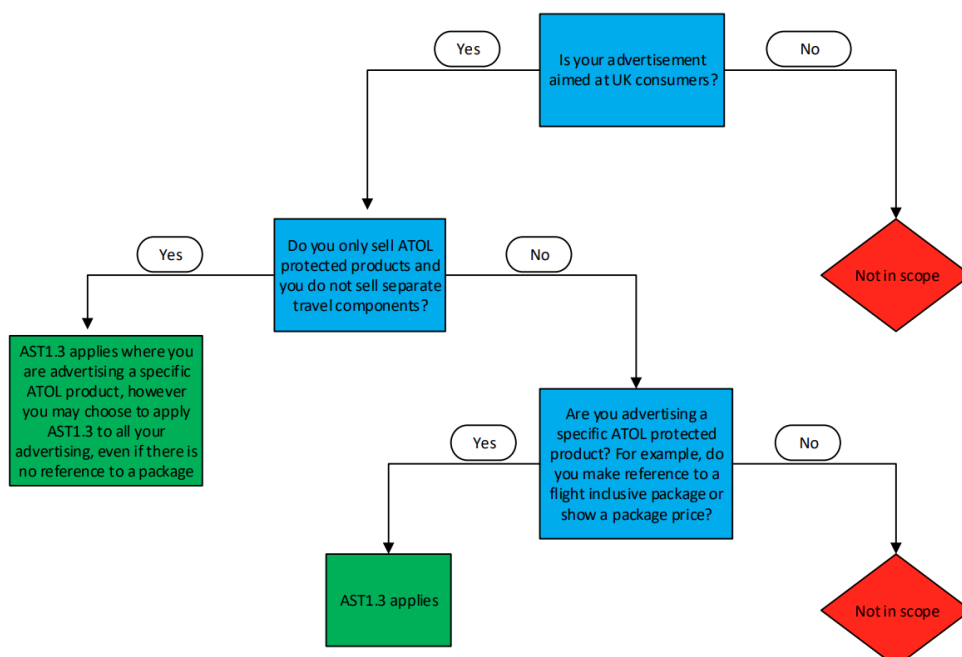
AST1.3

ATOL holders that advertise ATOL protected services to UK consumers must, unless the CAA agrees an alternative approach that achieves equivalent consumer clarity, ensure that the advert contains reference to ATOL protection.

2. This guidance is designed to assist ATOL holders in complying with ATOL Standard Term 1.3 and enable them to provide information on ATOL protection, in an appropriate form and format, to their customers.
3. ATOL holders are advised to consider this guidance early in the planning of their advertising and marketing campaigns to ensure that they reflect the requirements of AST1.3 taking account of this guidance. If you need further advice or information about these requirements, please contact the CAA's ATOL Compliance Team at ATOLCompliance@caa.co.uk.

How the policy applies

4. Not all advertising of holidays and flights is caught by AST 1.3. We have developed a decision-tree to enable you to make the appropriate decision as whether to include reference to ATOL protection in your advertisement:



The policy in more detail

5. This requirement applies to any type of advertisement (including promotional marketing) of an ATOL protected service that is aimed at UK consumers.
6. If you are an ATOL holder that only sells ATOL protected services, you may choose to refer to ATOL protection, even if your advertisement makes no specific reference to an ATOL protected trip.
7. If you sell both ATOL protected products and separate travel services, you must consider whether you are advertising an ATOL protected product. This will need to be assessed on a case-by-case basis but will be the case if your advertisement makes reference to ATOL protected products, for example it references the price of a flight-inclusive package or otherwise makes specific reference to an ATOL protected product. If AST 1.3 applies, you should refer to ATOL protection in that advertisement. If you are not advertising an ATOL protected product, for example if the advertisement is promoting general brand awareness or the general nature of holidays, or is advertising a hotel or location, this would not come in scope of AST 1.3.
8. If you feel that the product or service being advertised is less clear, for example where consumers could infer that what is being advertised is a flight inclusive package (but without the advertisement making specific reference to flight-inclusive packages or displaying prices), you may wish to incorporate wording such as “All flight-inclusive packages are ATOL protected.” You may also seek further CAA advice.
9. In terms of the form and format of the information provided on ATOL protection in any relevant advertisement, you should be guided by how the advertisement presents information on the product itself and on your brand. For example, if the advertisement includes your logo, then it should be possible for you to include the ATOL logo in the advertisement at the same time. If the advertisement includes a written statement e.g. describing the product, then it should be possible for you to include a written statement referring to the product being ATOL protected. Similarly, if the advertisement includes a voiced statement, then it should be possible to include a voiced statement referring to ATOL protection.
10. For digital platforms, and especially social media platforms where space is constrained such that the visibility of logos and text is limited, it may be more appropriate for you to make reference to ATOL protection by using tags (for example #ATOLProtected) and / or pinned comments, which direct the consumer to further information on ATOL protection.
11. Through this policy we aim to allow creative freedom and sufficient flexibility for you in your marketing campaigns, particularly in respect of the style of advert

and your own use of branding, whilst ensuring that the information is provided on ATOL protection.

12. This policy also applies to paid-endorsed client personality or influencers, but only where there is a contractual relationship in place, and you have editorial control. Again, this policy would only apply if they were advertising or promoting a specific ATOL protected product.
13. This policy does not apply for paid search advertising, including where AI is used to return search results.

Case Studies

14. These case studies are intended to provide examples of how you could meet the requirements of AST1.3. The examples focus on the form and format of the information provided on ATOL protection in any relevant advertisement. They are not exhaustive and provide guidance only:

Case Study 1:

An advertisement that contains text only, for example a social media post:

If the text contains reference to an ATOL protected product, we consider that such an advertisement would fall within the scope of AST 1.3. In this case the advert should contain the written words “ATOL protected”.

Case Study 2:

An advertisement that contains an image and text, for example a social media post:

If the text or image contains reference to an ATOL protected product, we consider that such an advertisement would fall within the scope of AST 1.3. In this case, given how the advertisement presents information on the product and your brand, it should be possible to include the written words “ATOL protected” and / or display the ATOL protected logo. The post text could also include the written words “ATOL protected”. Social media tags (for example #ATOLProtected) and / or pinned comments could also be used,

Case Study 3:

An advertisement is in the form of a longer-form video, for example as used in broadcast media (TV, cinema).

If the video contains specific reference to an ATOL protected product, we consider that such an advertisement would fall within the scope of AST 1.3. If the

advertisement is a video with a voiced statement, it should be possible to include the written words “ATOL protected” and / or display the ATOL logo, and to include the audible words “ATOL protected”. If the advertisement is a video without a voiced statement, it might not be appropriate to include the audible words “ATOL protected”, but it should be possible to include the written words “ATOL protected” and / or display the ATOL protected logo.

Case Study 4:

An advertisement is in the form of a short video, for example on a digital video platform.

If the video contains specific reference to an ATOL protected product, we consider that such an advertisement would fall within the scope of AST 1.3. If the advertisement is a video without a voiced statement, and in the context of how the advertisement presents information on the product and your brand, it should be possible to include the written words “ATOL protected” and / or display the ATOL protected logo. If the advertisement is a video with a voiced statement, but is a particularly short video (e.g. only a few seconds), it might not be appropriate to include the audible words “ATOL protected”. In such cases it is acceptable to include only the written words “ATOL protected” and / or display the ATOL logo.

Case Study 5:

An advertisement that contains audio only, for example a radio advert.

If the audio contains specific reference to an ATOL protected product, we consider that such an advertisement would fall within the scope of AST 1.3. In this case the advert should contain the audible words “ATOL protected”.

Case Study 6:

You are working with a paid/commission-based influencer, and you have editorial control over their content. They are making reference to ATOL protected products in their content, which therefore falls within the scope of AST 1.3. Through the editorial control you have over their content it should be possible to specify that they make an appropriate reference to ATOL protection. This will depend on the nature of the content and you should be guided by the case studies provided above.

The CAA acknowledges the challenges faced by you in ensuring that influencers consistently comply with the editorial requirements you set out. The CAA will take this into account in reviewing compliance with AST 1.3.

The Equality Act 2010 and accessible digital content

15. As explained earlier in this document, it is more common now for ATOL holders to advertise their services through a variety of non-broadcast media, including digital platforms and social media channels. As digital communication continues to grow, and people rely more on technology for connection to the outside world, accessibility is becoming a more critical part of digital communication.
16. The CAA has a legal duty¹ under the Equality Act 2010, called the Public Sector Equality Duty (PSED), which requires it to have due regard to certain objectives relating to equality whenever it exercises any of its functions. Although it is not a specific function of the CAA to ensure that the organisations that it regulates take steps to make their digital content accessible, as part of developing the proposal set out in this document, we have had due regard to the requirements of the PSED.
17. In this context we would like to encourage ATOL holders to consider the needs of a wide range of people when developing their advertising content, including people with accessibility needs. The Government Communication Service (GCS), which is a professional body for public service communicators working in government departments, agencies and arm's length bodies, publishes guidance and other material on how to make digital content accessible². Although this material is intended for government communications, much of it is general in nature and provides a useful resource for ATOL holders to help them engage with the issue of accessibility in their advertising content.

¹ <https://www.equalityhumanrights.com/guidance/public-sector-equality-duty-psed>

² <https://gcs.civilservice.gov.uk/guidance/accessible-communications/making-your-digital-content-accessible/>