



Rebuilding Consumer Confidence in Travel: Responding to the Global Travel Taskforce

The reopening of international travel will be hugely welcomed by industry and consumers alike, following a year of unprecedented strain and chaos for the sector. It is vital, however, that this is delivered in a safe, transparent and coordinated way, to ensure that people are confident they can book holidays overseas without undue hassle or stress.

The government, industry, regulators and consumer groups must work closely together to deliver a clear plan to meet the Government's roadmap in a way that works for all.

Which? welcomed the launch of the government's Global Travel Taskforce last year.

While the industry experience will be a central part of discussions around reopening, it is equally important that the Taskforce includes the consumers perspective in its decision making. In order to deliver a plan that works for consumers and helps to rebuild trust in the sector, the Taskforce must listen to both industry and consumer groups, including Which?. Which? research shows that trust in airline and holiday operators dropped significantly at the start of the pandemic with levels of trust currently similar to those in autumn 2019 when Thomas Cook collapsed.¹

Looking beyond the immediate reopening of international travel, we urge the Taskforce to highlight to the Government the need for a wider review of the consumer issues affecting the travel sector, such as consumer payment protections, an ineffective ADR system for aviation and the current lack of adequate travel insurance cover. We strongly believe this work needs to run concurrently with the upcoming reviews of ATOL, the Package Travel Regulations and the Airline Insolvency Bill.

What consumers want:

Confidence in the information they are given

- **Governments should make every effort to ensure that travellers are given clear information about the rules that apply to travel including where they can travel to and the requirements they must follow in order to be allowed to travel (such as test or travel health certificates, or quarantine). If the rules have to change, travellers should be given as much prior notice as possible.**
- **Travel and insurance providers should proactively give travellers clear information about their policies, highlighting policies that are relevant to the current situation including policies relevant to cancelled flights, changes in travel advice and refund policies.**

Confidence that travel will be safe

- **When international travel reopens, travellers will need reassurance on airport safety – the Taskforce must ensure airports have clear guidance in place on how to manage restrictions on social distancing for**

people arriving at the border; border operations must be adequately staffed and clearly communicated to travellers to ensure their safety.

- **If travel certificates for vaccines and covid tests are to be introduced, then the government must create guidance and regulations on their use to guarantee consistency, ensure oversight of private sector initiatives and address the following issues:**
 - **Vaccines and transmission** – currently there is limited data about the ability of vaccines to reduce transmission. The Government must continuously monitor emerging evidence on impact on transmission, differences between vaccine efficacy and impact on emerging variants. In addition, the Government must make it clear to travellers and travel operators that neither vaccination or negative covid tests negate the need for continued precautions to prevent the spread of Covid 19, this is to ensure consumers' safety is at the heart of Government policy on travel certifications.
 - **Protection from fraud and scams.** The government should ensure a robust accreditation scheme for organisations providing test certificates or vaccine certificates. Organisations providing accredited certificates for travel must also be easily identifiable.

Confidence they won't face extra costs

- **Passengers should have access to affordable and accessible tests to meet travel requirements.** Compared to other countries, private tests in the UK are significantly more expensive, with Which? research finding PCR tests cost £120 on average. In Italy, for example, the average cost of a PCR test is €86 euros, while in Lazio (Rome) is no more than €60 (a price capped by the region).²
- **Public health, including ensuring that new variants of covid-19 are not able to enter the UK, must remain a key priority.** If the Government continues operating the 'red list' of countries to achieve this, then any changes to the policy must ensure that financial risk to consumers is minimised and the Government's decision-making must be transparent.

Confidence they will get their money back if the holiday can't go ahead

- **Travel advice changing** – All travellers should get a refund if the FCDO changes its advice, travel corridors change, or there is a national or local lockdown preventing travel.
- **Right to a refund** – All travellers have a legal right to a refund in 14 days if their holiday is cancelled, and seven days if their flight is cancelled. Companies that refuse or don't refund within 14 days for a flight or 30 days for a package holiday should face legal action.
- **Ensure travellers have access to adequate travel insurance cover for new bookings** – Travellers buying new insurance policies face inadequate cover and increased costs, which adds to their lack of confidence to book and travel. Government must work with industry and regulators to ensure all travellers can access cover that protects them against FCDO advice related to the pandemic if international travel is to restart.

Confidence that travel health certification will be private and secure

- **Any travel health certificate should:**
 - be issued free of charge.
 - only be used for the stated purpose of traveling and data should not be retained on an ongoing basis.
 - be designed, built and maintained with the principle of secure by design³ and privacy by design.⁴
 - collect only the minimum amount of personal data necessary for the stated purpose of verifying a person's vaccination or covid test status.
 - be subject to end to end encryption of data in transit and at rest.
- **International interoperability** – Government should provide guidance on interoperability with technological systems established at international level. Provisions should be made for accepting non-digital and digital health certifications from other countries.
- **Accessibility** – all the travel certification schemes currently under development are digital and require the user to have a smartphone. However smartphone ownership is much lower amongst the over 65s.⁵

There may also be practical issues about faults or loss of power preventing users from accessing their certification. Therefore a non digital option, that is also free to travellers, should be made available.

- **Discrimination** – travellers who cannot be vaccinated for medical reasons, or have not yet had the opportunity, should still be able to travel and access services. It is important that those who have not had a vaccine can use alternative methods such as testing or quarantine to ensure they can still travel. The Government must ensure that travel certifications meet existing laws on human rights, data protection and discrimination.

1 Which? Consumer Insight, Consumer Trust in Industries, February 2021 report.

<https://consumerinsight.which.co.uk/articles/consumer-trust-february-2021>

2 Salute Lazio, Strutture private autorizzate test molecolari.

<https://www.salutelazio.it/strutture-private-autorizzate-test-molecolari>

3 NCSC, Secure Design Principles.

<https://www.ncsc.gov.uk/collection/cyber-security-design-principles/cyber-security-design-principles>

4 ICO, Data Protection by Design and Default.

<https://ico.org.uk/for-organisations/guide-to-data-protection/guide-to-the-general-data-protection-regulation-gdpr/accountability-and-governance/data-protection-by-design-and-default/>

5 Deloitte (2019) Global Mobile Consumer Survey: UK. Plateauing at the peak.

<https://www2.deloitte.com/content/dam/Deloitte/uk/Documents/technology-media-telecommunications/deloitte-uk-plateauing-at-the-peak-the-state-of-the-smartphone.pdf>