

Travel Industry Council of Ontario Implementation Plan on the Auditor General of Ontario's 2023 Value-for-Money Audit Recommendations

Background

On December 6, 2023, The Office of the Auditor General of Ontario (OAGO) released its value-for-money audit (now referred to as a performance audit) of the Travel Industry Council of Ontario (TICO).

The report identifies opportunities for TICO to enhance its operations in administering the *Travel Industry Act, 2002*, while also considering the significant changes that have occurred in Ontario's travel marketplace.

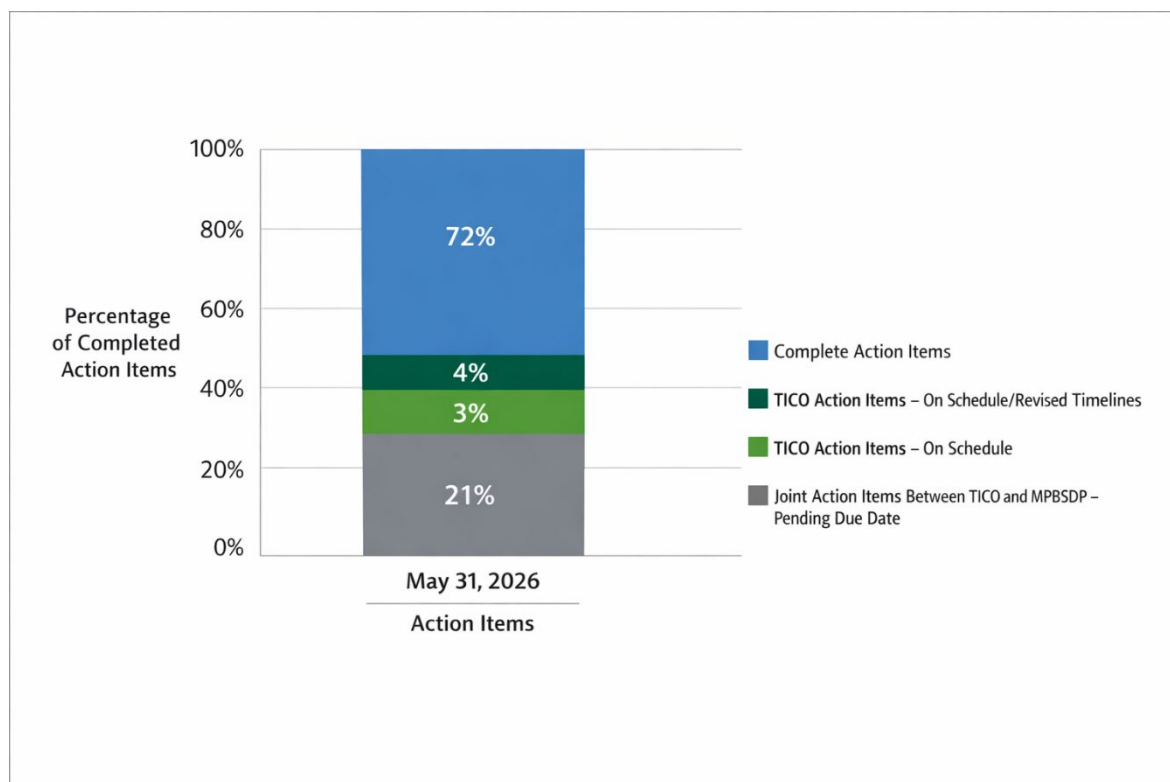
The OAGO's report contains a total of 16 recommendations, with nine of those directed at TICO, six directed at both TICO and the Ministry of Public and Business Service Delivery and Procurement (Ministry) and one directed at the Ministry. This report provides a summary of the actions taken by TICO to address the OAGO's recommendations directed to TICO as well as those recommendations that are joint between TICO and the Ministry. Action items directed solely at the Ministry are not included as part of this plan. These 16 recommendations are reflected in 29 action items.

TICO recognizes that the Ministry has indicated to the Auditor General that it will prioritize consideration of recommendation 16, which calls for a comprehensive review of the *Travel Industry Act, 2002* and TICO. This plan reflects this fact, and this has been noted accordingly throughout.

TICO is committed to enhancing its policies and procedures, risk-based decision-making processes, and its collection and analysis of data to improve business intelligence of the travel marketplace and the businesses it regulates.

TICO will provide quarterly updates on the plan's progress.

As of May 31, 2026, TICO has 21 complete action items, 1 action item that is on schedule for completion and 1 action item where a revised timeline has been updated. There are an additional 6 action items which are pending a due date based on the Ministry, which has indicated that these recommendations will be assessed for consideration and decision-making, as appropriate, after the consideration of recommendation 16.



Note: Statuses noted are based on TICO's self-assessment. Final assessment will be completed by the OAGO.

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Recommendation #1:

So that the Travel Industry Council of Ontario (TICO) complies with the Travel Industry Act, 2002 (Act) and its regulation, and handles registrant security deposits fairly, we recommend that TICO:

Action #	Action Item	Status
1.1	Immediately assess all registrant security deposits held for more than two years and return all deposits where the Registrar has no concerns over the registrant's compliance with the Act and its regulation.	Completed on June 30, 2024

Target Completion Date – June 2024

Steps taken

- Completed accounting for all returned and unreturned registrant security deposits.
- \$1,737,288 of registrant deposits held for more than two years, were returned to registrants.
- Reviewed and documented compliance rationale for holding remaining balance of unreturned security deposits.
- Established policy and process for unclaimed security deposit returns of \$150,000 where TICO was unable to locate the former registrants.
- Communicated to the registrants regarding unclaimed security deposits and the process to file a security deposit application.

Action #	Action Item	Status
1.2	Establish a reasonable target timeframe to review and return registrant security deposits where TICO does not have any concerns about a registrant's compliance with the Act and its regulation.	Completed on May 31, 2024

Target Completion Date – May 2024

Steps taken

- Reviewed internal processes related to the return of registrant security deposits to inform an appropriate timeframe when no further compliance concerns exist.
- Reviewed current policy and procedures in applicable departments that may trigger a security deposit to be returned.
- Established target timelines and policy for the return of registrant security deposits.
- Determined updates required for each department's procedures to ensure a clear process is established to trigger an assessment for all security deposits.
- Where return of a registrant's security was no longer possible, a separate policy has been created that includes a resolution for the appropriate use of the deposit.
- Conducted staff training on new policy and procedures.

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Action #	Action Item	Status
1.3	Develop and implement a process for reviewing and returning registrant security deposits within the established target timeframe.	Completed on November 30, 2024

Target Completion Date – June 2025

Steps taken

- Implemented an operational process for each department to trigger and monitor the assessment of security deposits held for possible return.
- Implemented system changes and reporting capabilities to ensure security deposits held for two years may be identified and processed in a timely manner.
- Enhanced disclosures on TICO's website and enhanced registration application form content about security deposits and parameters relating to length of time held and conditions for deposit returns.
- Conducted staff training on new process and reporting.

Recommendation #2:

So that the Travel Industry Council of Ontario (TICO) can process applications for new travel agent and travel wholesaler registration in a timely manner, we recommend that TICO:

Action #	Action Item	Status
2.1	Set targets and measure all components of application-processing times, from when the application is received to when it is closed.	Completed on January 31, 2026

Target Completion Date – September 2025

Steps taken

- Researched best practices across other regulators.
- Completed an operational review of TICO's registration process and identified bottlenecks and opportunities for efficiency.
- Current Registration Policy and procedures were updated to reflect enhancements.
- Implemented systems changes.
- Implemented enhanced internal metrics to measure and monitor application processing times.
- Reviewed the balanced scorecard and confirmed the associated KPI.
- Completed staff training.

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Action #	Action Item	Status
2.2	Review and revise its application form so that it is clear to applicants what specific information and supporting documents they are required to provide with their application.	Completed on April 30, 2024

Target Completion Date – April 2024

Steps taken

- Completed an internal review of the existing new registration application form and accompanying checklist to identify opportunities to streamline and clarify requirements.
- Updated forms and made enhancements to registration policy and procedures.
- Conducted staff training on policy and procedural changes.
- Published the enhanced application form on TICO's website.

Action #	Action Item	Status
2.3	Perform a cost-benefit analysis of implementing an electronic version of the application process with built-in controls to prevent incomplete applications from being submitted.	Phase 1: Completed on October 31, 2024 Phase 2: Completed on December 31, 2024

Target Completion Date – Phase 1: October 2024, Phase 2: December 2024

Steps taken

- Phase one:
 - Conducted an internal review and consulted with other regulators on best practices.
 - Updated current process map for a future online registration application process.
- Phase two:
 - Based on the results from phase one, completed a cost/benefit analysis by identifying automation opportunities to prevent incomplete applications from being submitted.

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Recommendation #3:

To confirm that applicants seeking to register as travel agents or travel wholesalers can reasonably be expected to be financially responsible in the conduct of their business, as required by the Travel Industry Act, 2002, we recommend that the Travel Industry Council of Ontario (TICO):

Action #	Action Item	Status
3.1	Require supporting documentation or third-party verification of key financial information submitted by applicants.	Completed on April 30, 2024

Target Completion Date – April 2024

Steps taken

- Conducted a review, including consulting with other regulators on best practices.
- Made necessary changes to new registration form and checklist.
- Published the enhanced application form on TICO's website.
- Assessed and updated registration policy and procedures.
- Conducted staff training on new requirements.

Recommendation #4:

So that the Travel Industry Council of Ontario (TICO) effectively oversees the travel agents and travel wholesalers it registers (registrants), we recommend that TICO:

Action #	Action Item	Status
4.1	Review and update its risk rating system for registrants to include an assessment of additional non-financial factors, including the results of past registrant inspections and registrant violations of legislative requirements.	Completed on December 31, 2024

Target Completion Date – December 2024

Steps taken

- Researched best practices of other regulators with similar non-financial risk rating factors.
- Reviewed current non-financial factors included in TICO's overall risk analysis and identified and documented all additional non-financial risk factors that may impact a registrant's risk rating.
- Enhanced future risk models to achieve a systematic methodology to assess and assign risk to all registrants.
- Enhanced the Risk Assessment Forms with new non-financial risk factors.
- Updated financial compliance and inspections policy, procedures, and inspections checklists.
- Conducted a training session with staff on the revised policy and risk assessment forms.

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Action #	Action Item	Status
4.2	Assign every registrant a risk rating.	Completed on December 31, 2025

Target Completion Date – December 2025

Steps taken

- Established an end-to-end risk rating system and process.
- All active registrants assigned a risk-rating.
- Reporting capabilities established and implemented, identifying all active registrants by risk and inspection status.
- IT systems have been updated to provide required monitoring and reporting of registrant risk ratings and inspection statuses.
- Documentation complete and staff trained accordingly.

Action #	Action Item	Status
4.3	Establish a policy for how frequently it should update registrant risk ratings.	Completed on December 31, 2024

Target Completion Date – September 2025

Steps taken

- Developed guidelines and criteria for the frequency of updates to risk assessments.
- Developed guidelines to ensure priority risks are identified, including that the frequency of assessments and inspections are maintained.
- Documented updated policies and procedures.
- Conducted staff training.

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Action #	Action Item	Status
4.4	Create guidelines for using registrant risk ratings to guide oversight activities.	In Progress

Target Completion Date – June 2026

Steps taken

- This action item is interconnected with actions 4.1, 4.2, 4.3, and 5.1.
- Established an updated risk rating system, process and frequency.
- Updated compliance policy and procedures.

Steps to be completed

- In conjunction with an established risk rating system, process and frequency, develop corresponding guidelines to proactively drive compliance and enforcement activities.
- Incorporate criteria from guidelines into IT system requirements to develop an automated current risk assessment roster of registrants to proactively prompt compliance and enforcement activities.
- Conduct staff training.
- Enhance transparency of risk rating process with registrants.

Recommendation #5:

So that the Travel Industry Council of Ontario (TICO) inspects travel agents and travel wholesalers (registrants) based on their risk to consumers and non-compliance with legislative requirements, we recommend that TICO:

Action #	Action Item	Status
5.1	Establish a policy on how frequently it should conduct inspections based on each risk rating assigned to registrants (low, medium and high).	Completed on December 31, 2024

Target Completion Date – December 2024

Steps taken

- Review completed to enhance future risk models to achieve a systematic methodology to assess and assign risk to all registrants.
- Aligned the policy with the new risk rating system established in Recommendations No. 4.1 to 4.4.
- Determined the frequency of financial compliance reviews and risk assessments that would trigger a site inspection, which is linked to a registrant's risk-rating.
- Incorporated criteria from guidelines into IT system requirements to develop an automated current risk assessment roster of registrants to proactively prompt compliance and enforcement activities.
- Updated compliance policy and procedures.
- Conducted staff training.

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Action #	Action Item	Status
5.2	Inspect each registrant in accordance with the registrant's risk rating.	In Progress

Target Completion Date – December 31, 2026 (Revised from June 2026)

Steps taken

- This action item is interconnected with actions 4.1 to 4.4 and 5.1.
- Inspections underway with focus on high-risk registrants followed by medium and low risk registrants.

Steps to be completed

- Conduct inspections of registrants identified based on established risk assessment and risk rating process.
- Develop system reporting for all assigned, work-in-process and complete inspections.
- Incorporate manager quality review for adherence to process as part of ongoing inspector performance audits.

Recommendation #6:

So that the Travel Industry Council of Ontario (TICO) can take disciplinary action against registrants for misconduct that falls outside of the current scope of the Travel Industry Act, 2002, we recommend TICO work with the Ministry of Public and Business Service Delivery to:

Action #	Action Item	Status
6.1	Create a mandatory code of ethics for registrants.	TBD
6.2	Establish a discipline committee and related processes for conducting hearings to determine when registrants have violated the code of ethics and take disciplinary action when warranted.	TBD

Target Completion Date – TBD

These recommendations would require regulatory changes under the Travel Industry Act, 2002. However, the Ministry has indicated that it will prioritize consideration of recommendation 16, which calls for a comprehensive review of the Travel Industry Act, 2002, and TICO. As a result, assessment of these recommendations for consideration and decision-making, as appropriate, is pending the outcome of the government's consideration of recommendation 16.

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Recommendation #7:

So that complaints against travel agents and travel wholesalers that warrant further investigation or enforcement action are consistently escalated for such action, we recommend that the Travel Industry Council of Ontario (TICO):

Action #	Action Item	Status
7.1	Record the outcome of each complaint in TICO's information system, including whether it was referred for investigation and enforcement action, and the results of the action.	Completed on October 31, 2024

Target Completion Date – October 2024

Steps taken

- Developed and documented a process map to link and track complaint referral actions and all outcomes with the applicable department(s) involved.
- Updated IT systems and establish reporting requirements.
- Made updates to applicable policies and procedures.
- Conducted staff training.

Action #	Action Item	Status
7.2	Monitor complaint outcomes and referrals to assess whether they are handled appropriately and in accordance with TICO's complaint-handling policy.	Completed on February 28, 2026

**Target Completion Date – December 2025
(Previously September 2025)**

Steps taken

- Established a monitoring and review process of complaints for managers of processes, referrals and outcomes to ensure consistency and effectiveness.
- Developed key trends report to identify complaint types/outcomes that may inform other regulatory responses, including potential regulatory changes to propose to government.

Action #	Action Item	Status
7.3	Create a policy outlining the documentation TICO expects its complaint handlers to record in its document management system, and the timeframe in which it expects all such information to be recorded.	Completed on April 30, 2024

Target Completion Date – April 2024

Steps taken

- Enhanced current policy and procedures to clarify a standard operating procedure for complaint officers to use in their daily routines related to complaint file supporting documentation.

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Recommendation #8:

So that Ontario consumers are protected from travel salespersons with a history of misconduct, we recommend the Travel Industry Council of Ontario (TICO) work with the Ministry of Public and Business Service Delivery to:

Action #	Action Item	Status
8.1	Advance amendments to the Travel Industry Act, 2002—made under the Strengthening Protection for Ontario Consumers Act, 2017, but not yet in force—that would give TICO the authority to register and regulate individual travel salespersons.	TBD

Target Completion Date – TBD

This recommendation would require regulatory changes under the Travel Industry Act, 2002 to be developed before the legislative provisions could be proclaimed. However, the Ministry has indicated that it will prioritize consideration of recommendation 16, which calls for a comprehensive review of the Travel Industry Act, 2002, and TICO. As a result, assessment of this recommendation for consideration and decision-making, as appropriate, is pending the outcome of the government’s consideration of recommendation 16.

Recommendation #9:

So that fees paid by registrants to the Travel Industry Compensation Fund (Compensation Fund) are used to compensate consumers who have suffered a financial loss, we recommend that the Travel Industry Council of Ontario (TICO):

Action #	Action Item	Status
9.1	Pay from the Compensation Fund only expenses that can reasonably be attributed to the administration, management, maintenance, and protection of the Fund.	Completed on December 31, 2024

Target Completion Date – December 2024

Steps taken

- Cost allocation study completed to validate the appropriate cost recovery from the Compensation Fund to reimburse TICO operations for associated support.
- Developed and implemented a new policy for determining the method and frequency of recovering reasonable costs associated with the administration, management and protection of the Compensation Fund.
- Reviewed and revised policies associated with the Compensation Fund and financial reporting.
- Implemented internal reporting structure supported by new and/or revised recording and monitoring processes, including strong internal controls.
- Implemented a new policy for determining the method and frequency of recovering reasonable costs associated with the administration, management and protection of the Compensation Fund.
- Implemented enhanced reporting structure that reflects applicable financial accounting policies, aligned with the legislation and supported by the external auditor.

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Action #	Action Item	Status
9.2	Revise its fee structure to ensure operating costs are sufficiently funded through registration and other fees charged to registrants.	Completed on April 30, 2024

Target Completion Date – April 2024

Steps taken

- Following stakeholder consultations in fall 2023, informed registrants and industry stakeholders of the new funding model and fee schedule on February 1, 2024 (60 days notice), along with guidance for the transition period.
- System changes based on new fee model completed to support new registration renewal fees and compensation fund assessments.
- Implemented changes to internal processes, specifying IT requirements to deliver new fee model.
- Finalized system requirements for late filing fees.

Recommendation #10:

So that the Travel Industry Compensation Fund (Compensation Fund) is providing value-for-money for the travel industry and consumers, we recommend the Travel Industry Council of Ontario work with the Ministry of Public and Business Service Delivery (Ministry) to:

Action #	Action Item	Status
10.1	Study and determine whether significant risk to consumers still exists to justify the cost of maintaining and administering the Compensation Fund, and whether the Fund can provide a positive net benefit.	TBD

Target Completion Date – TBD

The Ministry has indicated that this recommendation will be addressed, as appropriate, with the consideration of recommendation 16, which calls for a comprehensive review of the Travel Industry Act, 2002, and TICO.

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Recommendation #11:

So that the Board of Directors of the Travel Industry Council of Ontario (TICO) effectively executes its responsibilities to oversee the travel industry and protect consumers, we recommend that:

Action #	Action Item	Status
11.1	TICO utilize its board competency matrix and assessments to inform nominations to TICO's Board.	Completed on September 30, 2024

Target Completion Date – September 2024

Steps taken

- Reviewed the Competency Matrix to ensure that it continues to reflect the knowledge and skills required for the Board to effectively execute its mandate.
- Received Board approval on proposed changes to the Competency Matrix (reflected in Schedule C of the Administrative Agreement).
- Required all Board members to complete the Competency Matrix Self-Assessment which is required on an annual basis.
- Completed a gap analysis using the Competency Matrix Self-Assessments to identify any competency gaps and how they can be addressed. This analysis is conducted annually.
- Assessed whether competency gaps could be best addressed through board education and development or through board recruitment.
- Obtained Minister's approval for any changes to the Competency Matrix; Schedule C of the Administrative Agreement was executed on June 14, 2024.
- Prepared and released board recruitment materials for the Board elected positions to be filled, emphasizing the competencies and skills that the Board is seeking.
- The Governance and Nominations Committee reviewed applications received for elected board member positions taking into consideration the enhanced Competency Matrix and needs of the Board.
- Candidates chosen to advance in the election process were vetted to ensure that they met the eligibility criteria. The Governance and Nominations Committee recommended a slate of industry candidates and a public member to the Board for election by the members at the Annual Meeting on September 24, 2024. The Board ratified the slate of industry candidates and a public member for election by the members at the Annual Meeting on September 24, 2024.
- Election of Industry Director and Public Director at the Annual Meeting on September 24, 2024. Communicated with the Minister regarding the skills required by the Board.
- Communicated with the Minister regarding the skills required by the Board.
- Revisited competency gaps following any changes to the Board.

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Recommendation #12:

So that consumers purchasing travel services through registered travel agents are aware of the Travel Industry Council of Ontario's (TICO's) role, and the protections available under the Travel Industry Act, 2002, we recommend that TICO work with the Ministry of Public and Business Service Delivery (Ministry) to:

Action #	Action Item	Status
12.1	Require that, at the time of purchase, registrants provide purchasers of travel services with information brochures that outline TICO's regulatory role and consumer protections available.	TBD (Ministry) Completed on March 31, 2025 (TICO Voluntary Initiatives)

Target Completion Date – March 2025 (TICO's Voluntary Initiative), TBD (Ministry)

This recommendation would require regulatory changes under the Travel Industry Act, 2002. However, the Ministry has indicated that it will prioritize consideration of recommendation 16, which calls for a comprehensive review of the Travel Industry Act, 2002, and TICO. As a result, assessment of this recommendation for consideration and decision-making, as appropriate, is pending the outcome of the government's consideration of recommendation 16.

Steps taken (TICO's voluntary initiative)

- As a voluntary measure, the winter issue of the TICO Talk newsletter promoted consumer protection tools available to registrants in the Registrant Toolkit.
- Promoted importance of consumer protection and highlighted the benefits of TICO's registrant toolkit at an industry tradeshow.
- Promoted the Registrant Toolkit as part of TICO's communications for Travel Agent Day in May 2024.
- Shared information about the Registrant Toolkit at two stakeholder conferences, including a speaking opportunity and handouts at a booth.
- Organized focus groups to gain insights about possible enhancements to the Registrant Toolkit to encourage industry to share consumer protection information with clients.
- Based on the above reviews and initiatives, the Registrant Toolkit was updated with additional enhancements to aid registrants in their communication of available consumer protections to consumers.

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Recommendation #13:

So that consumers can make more informed decisions about which travel agents they may choose to purchase travel services from, we recommend that the Travel Industry Council of Ontario (TICO):

Action #	Action Item	Status
13.1	Provide detailed compliance and enforcement information about all registrants on its public directory.	Completed on February 28, 2025

Target Completion Date – December 2024

Steps taken

- Completed the review for opportunities related to enhanced consumer disclosures.
- Reviewed with the Regulatory Business Strategy Committee of the Board, a new draft policy in relation to enhanced public disclosures of compliance and enforcement information.
- Reviewed and received Board approval regarding enhanced registrant disclosures to the public and on future direction.
- Reviewed best practices of other regulators for the disclosure of compliance and enforcement information.
- Completed IT development associated with an enhanced agency search engine.
- Finalized a corporate policy addressing compliance and enforcement information for public disclosure required by the Act and/or Regulation.
- Launched a more user-friendly agency search engine.
- Advised registrants of changes to the directory.

Recommendation #14:

So that it can better inform its regulatory efforts to protect consumers, we recommend the Travel Industry Council of Ontario (TICO):

Action #	Action Item	Status
14.1	Conduct a review of data collection across all core regulatory functions to identify areas where additional data would help improve its regulatory efforts.	Completed on June 30, 2025

Target Completion Date – June 2025

Steps taken:

- Developed a high-level project plan and a process map template and assessed interdepartmental process dependencies.
- Reviewed registrant data that is collected and archived.
- Determined if new data is needed or if existing data is no longer required.
- Assessed against the legislation and obtained necessary approvals, as required, for any new registrant data required.
- Documented process maps and procedures with interdepartmental dependencies.
- Developed a design document for database development.
- Communicated with registrants in advance of any new data requirements.
- Documented process maps and procedures with interdepartmental dependencies.
- Developed a design document for database development.
- As part of assessing data requirements, TICO did not impose any advanced or new data requirements for registrants, thus no communication with registrants was required.

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Action #	Action Item	Status
14.2	Update its information systems to capture data identified by this review.	Completed on December 31, 2025

Target Completion Date – December 2025

Steps taken

- Based on the review in action item 14.1, designed system changes for new data management.
- Data migration not required following review in action item 14.1
- Completed operating system enhancements.

Action #	Action Item	Status
14.3	Obtain and analyze relevant travel market statistics on a regular basis.	Completed on September 30, 2024

Target Completion Date – September 2024

Steps taken

- Conducted a review of various sources of available market data.
- Determined the relevancy and use of the data.
- Designed and implemented system changes for new data collection.
- Finalized development/implementation/publishing of relevant reporting and dashboards for data utilization.
- Conducted internal training on the use of the reports and dashboards.

Recommendation #15:

So that the Ministry of Public and Business Service Delivery (Ministry) can effectively monitor and assess the Travel Industry Council of Ontario's (TICO's) performance in protecting consumers and regulating travel agents and wholesalers, we recommend that the Ministry work with TICO to:

Action #	Action Item	Status
15.1	Revise the performance indicators the Ministry uses to include indicators that more closely monitor TICO's operations, including in the areas of inspections, security deposits, complaint-handling, and the Travel Industry Compensation Fund.	TBD

Target Completion Date – TBD

The Ministry has indicated that this recommendation will be assessed for consideration and decision-making, as appropriate, after the consideration of recommendation 16, which calls for a comprehensive review of the Travel Industry Act, 2002, and TICO. While the Ministry prioritizes its consideration of recommendation 16, TICO will continue to report to the Ministry on current performance measures as part of TICO's business plans and annual reports.