COVID-19 Pandemic Disclosure Guidelines



Providing thorough disclosure to your customers has always been one of the most important parts of the booking process whether it is in person, telephone or online. It provides your customers with important information up front, so that they can make an informed decision prior to you completing their booking. Section 36 of the Ontario Regulation specifies what you have to disclose at the time of booking and our handy **booking checklist** was created to help you provide your customers with the required information.

What has changed?

What has changed since COVID-19 impacted everyone's travel plans?

COVID-19 created unprecedented new challenges for travel agents, such as keeping informed about the various changing travel restrictions and new requirements to enter countries around the world. COVID-19 is going to be a prominent part of everyone's travel plans because consumers will want to know how to be prepared when travelling during and after the global pandemic. Travel agents must adapt while also maintaining compliance with the disclosure requirements in the Regulation.

Whether you are booking travel for essential reasons, business travel or for customers booking a getaway vacation, you must disclose the entry requirements including typical information and travel documentation needed for **each** person travelling to successfully complete their trip. This applies to passports and visa information like it always has as well as any information or travel documentation required to re-enter the country upon their return.

Before Booking

Ensure you consider COVID-19 related disclosures such as:

- government required COVID-19 testing, including quarantine requirements.
- vaccine passports including limitations existing based on brand of vaccine or vaccine mixing.
- differences related to being partially vaccinated vs fully vaccinated and how this will impact their vacation.
- separate protocols specific to individual tour operators or suppliers (ex. cruise lines, coach tours).
- considerations for multi-destination trips that involve multiple countries that may have different entry requirements and vaccine / quarantine protocols.
- new re-entry requirements when returning to Canada (if applicable).

- travel insurance being offered covers COVID-19 related risks. In circumstances where coverage is ambiguous, consider recommending to your customers that they contact the insurer directly with specific questions or for more information.
- advising that the failure to comply with local laws could impact the vacation including but not limited to the termination of travel services at the cost of the consumer.
- disclosure to customers that the information and disclosures provided to them are not exhaustive and are provided as guidance to make an informed decision.
- consumers must be made aware that even with the required documents, they can still be denied entry especially if there is a COVID-19 related reason.

TIP: Consider implementing a business practice that allows you to provide the required disclosures at the time of booking and requires the customer to acknowledge and/or sign indicating they have been advised before moving on to the booking/payment process.

Your professional expertise and knowledge are vital to assisting consumers with making an informed booking decision.

The possibility of being denied entry into a country has become a greater risk than before COVID-19. Make sure your customers are ready with the right information.

After Booking

What information must be on the invoice?

Section 38 of the Regulation requires specific information to be included in writing on the statement, invoice or receipt issued to your customer(s) at the time of booking. This includes the typical information and travel documents required for travel outside Canada including the information you provided in relation to COVID-19. Invoices and similar documents can be multiple pages so long as the required information and disclosures are provided. Our handy **invoicing checklist** was created to help you provide your customers with the required information.

What if there are changes to the travel services due to COVID-19 that were presented to the customer in a brochure or advertisement at the time of booking?

Section 37 of the Regulation requires you to advise your customer of any changes to the travel services, which were referred to in written material such as brochures or advertisements and if known at the time of booking, might have affected their decision to purchase.

How can you best serve your customers in case the requirements change after the booking?

As a best practice, advise the customer that requirements could change prior to the travel date and recommend that they double check the documentation and entry requirements prior to departure.

Provide your customers with all the relevant resources including websites where they can verify the information themselves prior to their travel date. This will ensure that they have all the most up-to-date information. Also, let your customer know they can contact you with any further questions prior to departure.

Common Questions

Do I have to provide the COVID-19 disclosures if the booking is made in person or online?

All the required disclosures to the customer must be provided whether the booking is made in person, over the telephone or online.

Why do I have to advise consumers about COVID-19 test requirements?

As proof of testing for entry can differ, depending on the destination, it is important that the consumer is provided with current information relating to testing and documents needed. By advising the consumer of current requirements and reiterating that on the invoice you are providing proper disclosure in addition to protecting yourself as the invoice reflects an agreement between both parties.

Online Resources

ArriveCAN App

This free app is the official Government of Canada platform for you to provide your information when entering Canada.

www.canada.ca/en/public-health/services/diseases/coronavirus-disease-covid-19/arrivecan

Federal Government COVID-19 Travel Website

The Ontario government has a useful website full of information related to travel requirements and considerations. It includes up to date details about planning your entry into Canada, testing & quarantine requirements, leaving & while outside Canada and more. travel.gc.ca/travel-covid

Federal Government Travel Websites

This page has useful information related to travel requirements, global travel advisories, passport information and more.

travel.gc.ca travel.gc.ca/travelling/advisories

TICO Resources goodcodeclub.com/tico/

Disclaimer

These guidelines have been developed to assist registrants to comply with the requirements and prohibitions found in the Act and Regulation. These guidelines contain information regarding TICO's interpretation of the legislative and regulatory provisions and suggested best practices. If you have any questions regarding the information in this document, you should contact TICO.

The information provided is for general informational and educational purposes only and is not intended to provide legal advice to any individual or entity. These guidelines are not exhaustive and cannot hope to address the complexities of every travel business in the province. Further, registrants are subject to other federal, provincial and municipal laws that impact their businesses. We urge you to consult with your own legal advisor regarding the specifics of your business and compliance with the Act and Regulation. You should not rely on information in this document as an alternative to legal advice.

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