

# CONSUMER DUTY ASSESSMENT

<b>Description or Name</b>	Changes to product information on VisitScotland.com
<b>Date</b>	December 2025 for publication
<b>Project Manager</b>	VisitScotland Product Owner
<b>Sponsor</b> (if relevant)	
<b>Department &amp; Directorate</b>	Performance Marketing
<b>Version History Information</b> Retain all previous <u>approved</u> versions of the CDA	April 2025 draft for internal review December 2025 for publication

## WHO IS THE VISITSCOTLAND CONSUMER?

For the purposes of this project, this assessment and the legislation, VisitScotland has interpreted ‘consumer’ to mean:

- Visitor consumer group – potential visitors and visitors to Scotland viewing the VisitScotland.com website for inspiration and information for a trip.
- Tourism business consumer group – tourism business owners using the VisitScotland.com website to connect with, and provide information to, visitors and travellers.

## BACKGROUND INFORMATION

There have been tourism business web listings on visitscotland.com for over 20 years. During this time there have been many factors that have influenced the organisation’s approach to web listings, such as the changing nature of the tourism industry, the compliance and governance environment that VisitScotland operates in, and the evolving digital landscape.

Throughout this time VisitScotland has engaged widely with tourism businesses (small and large), other stakeholders, and visitor consumers across different markets.

Currently the data source that supplies the information for tourism business web listings and the product search site functionality comes from a bespoke destination management system (DMS) supplied by Simpleview. Tourism businesses currently update their information in the DMS via an individual login. Changes made in this system update the business’s information on VisitScotland.com, but nowhere else.

VisitScotland has decided to replace the data source for business information to a service that better reflects the change in visitor consumer behaviour, the evolving digital landscape and the needs of the tourism business consumer. Detailed below is the research undertaken to support this decision (Insights) and the details of the decision (The Change/Decision)

## INSIGHTS

Advances in digital technology and subsequent shifts in visitor consumer behaviours have diminished the overall value to VisitScotland in offering and maintaining a web listings platform. Insights gathered over the past three years highlight the following key challenges:

- **Low visitor consumer engagement:** from January 2021 to March 2024, only 4.6% of users interacted with Product Search functionality on visitscotland.com.
- **Minimal tourism business consumer participation:** industry engagement with the DMS has dropped markedly, with only 15.9% of web listings updated within the past 12 months.
- **Online travel agencies and individual tourism business websites:** 91.5% of tourism business consumers currently listed in the DMS already maintain their own digital presence elsewhere using their own website or other online travel agencies.
- **Evolution of organic search<sup>1</sup>:**
  - Search engines have already evolved to understand the intent behind search queries, enabling them to deliver more relevant search results for visitor consumers. This has resulted in most individual tourism business websites outranking VisitScotland web listings when visitor consumers search for a specific business, negating the need for tourism businesses to maintain and update a web listing on VisitScotland.com.
  - In addition, when a visitor consumer searches for a business or place near their location, they will find local results across Google in places like Maps and Search. To improve organic visibility, the most effective action a tourism business can take is to maintain a Google Business Profile.<sup>2</sup>
- **Environmental impact:** web listings accounted for 41% of VisitScotland.com's total carbon usage (mostly via organic search as noted above) in 2023. With visitor consumer engagement declining and most business consumers maintaining their web presence elsewhere, much of this carbon usage can be classified as 'wasted'.

Research undertaken by VisitBritain in 2022 found that visitor consumers tend to use National Tourism Organisation (NTO) websites (like VisitScotland.com) for inspiration rather than booking.<sup>3</sup> This is further supported by a 2023 study carried out by Expedia, which suggests that social media, NTO websites and search engines play the largest role at the inspiration and research stages of the visitor consumer journey.<sup>4</sup> In addition, VisitScotland's latest visitor consumer survey data (2023)<sup>5</sup> found that only 3% of visitors across markets used VisitScotland.com to book accommodation.

Lastly, a qualitative study undertaken by Designit on behalf of VisitScotland in late 2024/early 2025 discovered that hyper-personalisation is transforming every stage of the trip planning process, including booking.<sup>6</sup> Visitor consumers that took part in the study had their own trusted suite of online travel agencies for booking accommodation and activities. These tools (e.g. Kayak, Booking.com, Get Your Guide, etc) set the expectation for advanced customisation that were not met by equivalent functionality on VisitScotland.com.

However, Designit's research also highlighted the importance of seamlessly connecting visitor consumers with tourism businesses earlier in the visitor consumer journey to help them build concepts for a trip. VisitScotland.com could effectively meet this visitor consumer need by leveraging market

leading third-party data to surface up-to-date product information across the website, whilst referring more traffic directly to tourism business consumers.

## THE CHANGE/DECISION

VisitScotland has been carrying out strategic reviews across many of its activities, to ensure it continues to deliver the best economic impact for Scotland. As part of the review process, VisitScotland has considered the role it plays in serving product information to visitor consumers, how it engages with tourism business consumers in this area, and how that functionality should be delivered in the future.

As mentioned above, VisitScotland has decided to replace the data source for business information to a service that better reflects the change in visitor consumer behaviour, the evolving digital landscape and the needs of the tourism business consumer.

The objective of the change is to:

- Provide up-to-date information on tourism businesses and events across VisitScotland’s websites to help potential visitor consumers quickly form concepts for a trip to Scotland.
- Enhance coverage of tourism businesses and events across Scotland.
- Improve the visitor consumer experience and ensure functionality on VisitScotland websites meets the AA level of Web Content Accessibility Guidelines ([WCAG 2.2](#)).
- Make it easier for tourism business and events to maintain visibility across VisitScotland websites, including tourism business consumers with lower levels of digital literacy.
- Reduce environmental impact of VisitScotland websites by streamlining functionality and reducing duplication across the digital landscape.

In future, the data for tourism business information will be obtained from third parties data streams, including Google, rather than bespoke VisitScotland in-house systems. Many tourism businesses already have a Google Business Profile, which is updated regularly, alongside their own website. VisitScotland’s Business Enquiry and Support Programme will provide support for tourism business consumers that don’t currently have a Google Business Profile, to ensure they maintain visibility on VisitScotland websites. The VisitScotland Business Support Hub can be accessed online at <https://support.visitscotland.org>, via email at [business.support@visitscotland.com](mailto:business.support@visitscotland.com), or by phone on 01463 244111.

VisitScotland.com visitor consumers can currently book accommodation through the availability search engine on the website. As the majority of potential visitors use national tourism websites for inspiration and research, this functionality will no longer be available and website visitor consumers will be signposted directly to tourism business websites or other travel intermediaries instead.

Google data in combination with VisitScotland regions data will be utilised in map functionality and destination content. There will no longer be individual towns and villages pages on VisitScotland.com as this information is well catered for elsewhere in the digital landscape.

The following elements of the Consumer Duty guidelines were considered when the decision was taken.

1. Access - can people get the goods or services they need or want?	As this is a website-related decision, where improvements to accessibility are a key
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	<p>deliverable, it is believed that the service accessibility will be better provided for by this decision.</p>
<p>2. Choice - is there any meaningful choice? While there might not be choice of service provider or what service is provided, choice might sometimes mean how a service is provided.</p>	<p>The change to the data source will not reduce the choice for either consumer group. VisitScotland will still be the website provider. The visitor consumer will still be able to find the information they seek via VisitScotland.com. The tourism business consumer will be advantaged by the decision, as they will no longer need to update a separate, bespoke data source.</p>
<p>3. Safety - are consumers adequately protected from risks of harm?</p>	<p>There are no safety issues for either consumer group.</p>
<p>4. Information - is it accessible, accurate and useful?</p>	<p>The information and its accessibility will be improved by the change. The accuracy of the data will be improved by the change.</p>
<p>5. Fairness - are all consumers treated fairly?</p>	<p>As this is a website change, all consumer groups will be treated fairly.</p>
<p>6. Representation - do consumers have a meaningful role in shaping how goods and services are designed and provided?</p>	<p>As this is a website change, there is only so much of a meaningful role that consumer groups can have in the design and provision of the service. However, VisitScotland actively seeks visitor consumer and tourism business consumer feedback via its online form and through its stakeholder engagement activities and Business Support Programme.</p>
<p>7. Redress - if things go wrong, is there an accessible and straightforward way to put them right?</p>	<p>It is easy for either consumer group to contact and engage with VisitScotland via the contact methods on its website. VisitScotland employs its own inhouse development team, who can work to resolve any issues that arise. Tourism business consumers can rectify any issues with their own web listing data by updating the systems that they already engage with (Google).</p>
<p>8. Sustainability</p>	<p>As detailed above:  <b>Environmental impact:</b> web listings accounted for 41% of VisitScotland.com's total carbon usage (mostly via organic search as noted above) in 2023. With visitor consumer engagement declining and most business consumers maintaining their web presence elsewhere, much of this carbon usage can be classified as 'wasted'.  Therefore, this change would make a significant impact on environmental sustainability.</p>

	<a href="#">Sustainability at VisitScotland - Our Policies   VisitScotland.org</a>  <a href="#">VisitScotland's Climate Change Action Plan   VisitScotland.org</a>
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**THE PLAN**

As this is a change to a website, the approach will impact all visitor consumers and tourism business consumers without differentiation.

VisitScotland will phase this activity. The first phase will focus on VisitScotland.com and will look to scale the activity up to deliver on its other websites in future phases.

For the small percentage of tourism businesses that do not have an existing Google Business Profile, VisitScotland’s Business Support Programme will provide guidance on how they can maintain their visibility across VisitScotland and other websites. This guidance will be provided consistently for all tourism business consumers requiring support.

**ENGAGEMENT WITH STAKEHOLDERS**

VisitScotland has engaged with a range of industry stakeholders during the review and project scoping process. These have included representatives from the Association of Scotland’s Self-Caterers, Association of Scottish Visitor Attractions, Scottish Agritourism and other bodies representing the sector.

During this engagement, no feedback has suggested that this decision would differently or negatively affect either consumer group, whether they are visitor consumers or tourism business consumers.

During this engagement, no feedback has suggested that this decision would create any potential barriers for tourism business consumers or visitor consumers.

**THE ASSESSMENT**

Stage	Tasks	Outcome
<b>Planning (1)</b>	Decide if this is a strategic decision or not. If not, then proceed to <b>stage 5</b>	This is a strategic decision for VisitScotland as it is a fundamental change in how the web listings serve visitor consumers and tourism business consumers.
	Decide if the strategic decision will impact on consumers. If not, then proceed to <b>stage 5</b>	<p>The decision will not impact either consumer group negatively. Failure to make this change would negatively impact both consumer groups.</p> <p>It could be argued that the visitor consumer group would be unaware that anything has changed, as they would still be served the content they are seeking –</p>

		<p>but merely from another source. The data source would be more up to date and therefore more relevant.</p> <p>The tourism businesses consumer group would benefit from the change as they would only need to update their existing content, which 91.5% of businesses already do. Whilst only 15.9% of tourism business consumers have updated the bespoke web listing system in the last 12 months.</p> <p>Additionally, the changes will improve website accessibility to ensure it meets the AA level of Web Content Accessibility Guidelines (<a href="#">WCAG 2.2</a>).</p>
	If this is a strategic decision, that will have an impact on consumers, then develop a plan for how to complete <b>stages 2-5</b> , including required consumer engagement.	This is detailed above.
	Understand the aims and outcomes of the proposal and identify alternative options.	<p>In order to better comply with accessibility requirements and provide the most up to date information (to visitor consumers, about tourism business consumers), changes need to be made to the data source, therefore, there are no reasonable alternative options.</p> <p>Developing the existing bespoke or a new bespoke data source would create an unfair burden on VisitScotland and would greatly disadvantage the tourism business consumer. Insights data above demonstrates that tourism businesses no longer update the bespoke data source.</p> <p>There would be no advantage for the visitor consumer in any alternative options.</p>
<b>Evidence gathering (2)</b>	<p>Sufficient evidence gathered to answer:</p> <ul style="list-style-type: none"> <li>• What is the proposal trying to achieve?</li> <li>• What are the impacts on consumers, if any?</li> </ul>	<p>The evidence is highlighted in the sections above.</p> <p>The proposal is detailed above.</p> <p>The decision will only impact either consumer group positively.</p>

	<ul style="list-style-type: none"> <li>• What are the impacts, if any, on consumers in vulnerable circumstances?</li> <li>• Is it likely that harm will be experienced by consumers as a result of this proposal?</li> <li>• What alternative proposals are there that can improve outcomes for consumers and/or reduce harm to consumers?</li> <li>• How do these alternative proposals compare to the original proposal?</li> <li>• Has your engagement with consumers established any themes you hadn't previously considered?</li> </ul>	<p>There would be no impact on consumer groups in vulnerable circumstances.</p> <p>There would be no harm to either consumer group as a result of this proposed change.</p> <p>Any alternative options would greatly disadvantage one or both consumer groups. This change does not.</p> <p>Our engagement has not established any additional themes.</p>
	Identify and fill any gaps in evidence to answer questions above	All the relevant information is provided above.
<b>Assessment and improvement of proposal (3)</b>	Consider answers to <b>stage 2</b> to assess the impact of the strategic decision on consumers	The decision will only impact either consumer group positively.
	Consider if any improvements need to be made to the initial proposal in light of findings of impact on consumers	<p>As there is no negative impact on either consumer group, no changes or improvements need to be made to the proposal.</p> <p>Support will be provided to the tourism business consumer groups that do not have an existing Google Business Profile through VisitScotland's Business Support Programme, which will provide guidance on how they can maintain their visibility across VisitScotland and other websites. This guidance will be provided consistently for all tourism business consumers requiring support.</p>
	Consider if any further consumer engagement is necessary	No further engagement is required.
<b>Decision (4)</b>	Consider the findings of previous stages and agree any changes to the proposal	No changes to the proposal are required.

	<p>Document clearly how you have met the consumer duty:</p> <ul style="list-style-type: none"> <li>• The impact of the strategic decision on consumers and the desirability of reducing harm to consumers have been considered throughout the process</li> <li>• That an outcomes-based approach has been taken to achieve the best outcomes for consumers.</li> </ul>	This is detailed above.
<b>Publication (5)</b>	The Consumer Scotland 2020 Act requires public authorities to publish information about the steps which they have taken to meet the duty.	This assessment will be published on VisitScotland's corporate website. <a href="https://www.visitScotland.org">VisitScotland.org</a>

### Approval process

<b>Completed by and date</b> Project owner/responsible staff member	Governance Manager Senior Product Owner
<b>Authorised by and date</b> Head of Department	Head of Digital Delivery (December 2025)
<b>Authorised by and date</b> Head of Legal	Legal Counsel (November 2025)
<b>Authorised by and date</b> VisitScotland Director	Chief Technology Officer (December 2025)