

Ministerial Travel, Meal and Hospitality Expenses

Report of the Auditor General

Bermuda



October 2025



Office of the Auditor General

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The Honourable Dennis P. Lister, JP, MP
Speaker of the House of Assembly
Sessions House
21 Parliament Street
Hamilton HM 12

Honourable Speaker:

Pursuant to Section 13 of the Audit Act 1990, I have the honour to submit herewith my audit report on Ministerial Travel, Meal and Hospitality Expenses and disclosure of the travel expenses.

Respectfully submitted,

A handwritten signature in cursive script, appearing to read 'Heather M.'.

Heather Thomas CPA, CFE, CGMA
Auditor General

Hamilton, Bermuda
October 2025

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1. Overview

What we found

- 1.1 We found that although there are no relevant legislations or any applicable requirement in the Ministerial Code of Conduct or any Government of Bermuda's statute to report and publish ministers' official overseas travel; the Government of Bermuda's Ministers proactively disclose on the Government of Bermuda website - a travel calendar page that details Ministers' official overseas travel.
- 1.2 The travel expense webpage was relaunched October 29, 2017, and includes the following components [<https://www.gov.bm/travel-calendar>]:
 - a. The name of the ministry that bears the costs,
 - b. The purpose and duration of the travel event, and
 - c. Itemized costs (transport, accommodation, and so on).

The public coffer pays all authorized ministerial travel, meal and hospitality expenses.

- 1.3 While the disclosure of ministerial travel expenses is not mandated by legislation, its disclosure serves as a demonstration of respect for public funds, fiscal responsibility and accountability. Transparency in the use of government funds – particularly when traveling on government-approved travel – is widely regarded as best practice.
- 1.4 We found opportunities for improvements over the ministerial travel expense claims and disclosure in all scoped-in ministries examined as a part of this report, and recommend the Secretary to the Cabinet and the Permanent Secretaries communicate and ask all ministries to review their internal systems and protocols in light of the recommendations in this report.
- 1.5 We found the following:
 - a. Incomplete and inaccurate public disclosure on the travel webpage resulting from the scoped-in ministries' supporting documentation being incomplete.
 - b. The Ministerial Code of Conduct [the 'Code'] sets out the principles, rules, responsibilities that outlines expectations regarding Ministers' visits overseas and expenses on travel, meal and hospitality, and free/subsidized travel but the enforcement of these principles varied across the scoped-in ministries.
 - c. The Code specifies that a Minister should ensure that his Ministry prepares and maintains a comprehensive and central record of his travels overseas, such a record to contain details of the numbers and costs of all Ministerial delegations whose travel has been at the public expense. A thorough and central record of overseas travel at public expense is not maintained by all ministries.

- d. Overseas travel expenses claims were not all appropriate and adequately supported. Section 10.6.6 of the Financial Instructions [FI] states that detailed supporting documentation must be provided for every charge on the monthly statement. We found expenses without appropriate support such as receipts, or detailed support and therefore were unable to determine whether items claimed in these instances were adequately supported. FI section 10.6.6 states summary receipts are not acceptable, and that typical supporting documentation would include an original invoice or receipt detailing goods or services purchased.
 - e. There is no reporting requirement mandating when to publish the authorized travel expenses details to the travel expense webpage. This resulted in reporting ministries posting to the travel calendar webpage between a month or some months after the travel expense claim was prepared/processed.
 - f. Not all ministries were aware that the issuance and use of the Government credit card meant they understood and acknowledged responsibility to comply with the FI. All ministers of the ministries scoped-in signed the Government Credit Card Usage Agreement Issued by the Accountant General evidencing they read, understood and acknowledged their responsibility to comply with FI.
- 1.6 This report was circulated to the scoped-in ministries for feedback prior to being finalized. No objections were received to the findings presented and we now look to the Government to act on the enclosed recommendations.

2. About the audit

Introduction

- 2.1 The audit objective was to assess whether ministries (and their departments) have a framework in place specific for ministerial travel, meal and hospitality expenses, and its disclosure.
- 2.2 The office will follow a rotational approach, so that we audit each ministry once over a two-year period.
- 2.3 The following ministries were selected for this audit:
 - Cabinet Office and Digital Innovation
 - Economy and Labour
 - Home Affairs
 - Finance
 - Transport*, and
 - Tourism, Culture and Sport*

***These two ministries were combined as one in March 2025**

- 2.4 The audit covered the framework, and the processes to account for any minister's travel expense claims and disclosure of the travel expenses on the Government of Bermuda webpage for the period January 2023 to December 2024.
- 2.5 The audit approach included a review of the Government of Bermuda – Ministerial Code of Conduct, Accountant General's Department – Financial Instructions, other policies and documents, interviews with the accounting officers and staff, and examination of travel expense claims.
- 2.6 The audit criterion was developed specifically for this audit and was discussed with, and accepted as appropriate by the accounting officers for the above-named ministries.

Criterion

- 2.7 We examined whether ministries had a framework in place that guides decisions and sets the boundaries for the consistent and uniform application to account for ministers' overseas travel claims and disclosure of the travel expenses on the Government of Bermuda webpage.

Why we chose this subject matter

- 2.8 The subject of ministerial travel expenses is an object of interest to the public and users of public money are accountable to uphold the principles of public financial management.
- 2.9 Independent audits that examine whether ministers' travel expense claims comply with the Code and Financial Instructions are an important component of a rigorous oversight framework. The results of these audits could be used to identify potential improvements and promote diligence and discipline from all individuals who are responsible for travel expense claims. Reports such as this encourages the continuous improvement in the Government of Bermuda's financial administration and management.

What we examined

- 2.10 We have spent considerable time gaining an understanding of the approaches taken by each ministry to complete, review and upload to the travel webpage – the ministers' overseas travel expenses. We examined credit card statements [where available], travel expenses claims, purchase orders, along with all supporting documentations (transactions) available for the period January 2023 to December 2024 for the scoped-in ministries.
- 2.11 For the ministries scoped-in as a part of this review, we reviewed the following events and transactions:

2024	33 travel events comprising of 464 transactions*	\$159,678
2023	39 travel events comprising of 613 transactions*	\$188,479

*These numbers excluded local transactions, credit card fees and charges, and overseas transaction fees.

- 2.12 A government credit card usage agreement [per Financial Instruction section 10.6] was issued and signed by each minister scoped-in as a part of this review. Each minister of the scoped-in ministries attested to having read, understood, and accepted their responsibility to adhere to the Financial Instructions by signing the Government Credit Card Usage Agreement.

2.13 Table 1 - Summary of travel transactions by dollar value.

	Per the Government travel webpage	Travel reviewed and should be disclosed	Paid travel but not taken
\$	Disclosed	Undisclosed in the travel webpage	Undisclosed in the travel webpage
2024	118,937	40,741	1,353**
2023	182,673	5,806	6,783*
Total	301,610	46,547	8,136

*These travel-related credits were not used and have expired.

** These travel-related credits were not used; at the time of inquiry and remain valid for future travel-related expenditure.

2.14 Table 2 - Summary of findings for the ministries scoped-in.

Finding	Policy	Conclusion	Year	Ministry					
				Cabinet Office*	Finance	Economy and Labour	Home Affairs	Tourism, Culture and Sports**	Transport**
Travel and travel-related expenses without receipts	Financial Instructions secs. 10.6.6, 10.1.5, 10.1.8	Non-compliant	2024	X	X	X	X	X	X
			2023	X	X	X	X	X	X
Supporting documentation was not submitted within 30 days of the charge in all cases	Financial Instructions secs. 10.6.13, 10.6.6	Non-compliant	2024	X	X	X	X	X	X
			2023	X	X	X	X		X
Lack of comprehensive and central record of ministerial travels at the ministries available for review on short notice	Ministerial Code of Conduct sec. 16.3	Non-compliant	2024	X	X	X	X	X	X
			2023	X	X	X	X	X	X
Signed government credit card usage agreement	Financial Instructions sec. 10.6	Compliant	2024	X	X	X	X	X	X
			2023	X	X	X	X	X	X

*Now "Cabinet Office and Digital Innovation"

**Now under one ministry

Conclusion

2.15 Opportunities exist to improve the processing of ministerial travel expense claims. Internal controls, training, and guidance, are all fundamental in the processing of the travel expense claim. Ministries must have efficient systems in place for the process to be effective.

2.16 We recommend that the scoped-in ministries improve their processes in preparing the travel expense claims, and the public disclosure. And those ministries that were not scoped-in to review their processes along with the findings within this report.

- 2.17 The Financial Instructions (last updated in 2018) to be assessed to ensure it continues to meet its intended objectives and where necessary, to facilitate enforcement.
- 2.18 There could be a risk that the public coffer could be subsidizing travel expenses that should be reimbursed by the traveler or not related to the Government of Bermuda business. There would also be a risk that the public disclosure is not complete or accurate.
- 2.19 Travel expense claims of ministerial delegations are not part of public disclosure in the travel webpage. We did not audit the travel events attributed to the ministerial delegations, although we came across many of them. We recommend to include numbers and costs of all Ministerial delegations whose travels have been at public expense in the travel webpage, including event registration fees or attendance fees.

Why this Conclusion matters

- 2.20 Ministers are expected by the people of Bermuda to follow the law and use public finances responsibly. Every minister who uses funds from the public coffers is responsible to account for that use. Effective internal systems and protocols are needed to ensure compliance for travel expense claims. Residents of Bermuda must be reassured that these internal procedures and processes are well thought-out and operating efficiently.

3. Findings and observations

3.1 Here are our detailed observations and recommendations:

3.1.1	Travel and travel-related expenses without receipts.
2024	a) During our examination, we reviewed 101 transactions representing 22% of the 464 transactions reviewed, totaling \$16,410 that lacked supporting receipts. Of these 101 transactions, 44 included memos in compliance with FI that the travel expenses submitted on the travel expense claims were bona fide Government-related expenditures. However, due to the absence of original documentation detailing the goods or services purchased, we were unable to independently verify the validity of these expenditures as Government-related travel expenditures. b) Of the 101 transactions reviewed that lacked supporting receipts, 66 involved transactions values greater than \$20, totaling \$16,025. The remaining 35 transactions were valued at \$20 or less, with a combined total of \$385. The 66 transactions exceeding \$20 were distributed across the in-scoped ministries as follow: - o Ministry of Tourism, Culture and Sport – 35 occurrences - o Ministry of Finance – 13 occurrences - o Ministry of Transport – 11 occurrences - o Ministry of Home Affairs – 5 occurrences - o Cabinet Office – 1 occurrence - o Ministry of Economy and Labour – 1 occurrence
2023	c) During our examination, we reviewed 103 transactions representing 17% of the 613 transactions reviewed totaled \$13,707 that lacked supporting receipts. Of these 103 transactions, 72 included memos in compliance with FI that the travel expenses submitted on the travel expenses claims were bona fide Government related travel expenditures. These transactions including memos totaled \$5,312.

	d) Of the 103 transactions reviewed that lacked supporting receipts 53 involved transactions with values greater than \$20 totaling \$13,107; the remaining 50 transactions valued at \$20 or less with a combined total of \$600. The 53 transactions exceeding \$20 were distributed across the in-scoped ministries as follow: - o Cabinet Office – 17 occurrences - o Finance – 12 occurrences - o Transport – 11 occurrences - o Economy and Labour – 8 occurrences - o Tourism, Culture and Sport – 7 occurrences - o Home Affairs – * supporting information was unavailable for review for the 4 travel events disclosed on the travel calendar webpage.
Policy Financial Instructions	10.6.6 Supporting Documentation. Detailed supporting documentation must be provided for every charge on the monthly statement. Summary receipts are not acceptable. 10.1.8 All claims for payment of travel expenses should have proper supporting documentation, such as detailed invoices or receipts. Original receipts must be attached to the travel claim. Credit card statements / receipts are not acceptable as sole support for any travel expense. 10.1.5 Per Diem... Receipts are required for all expenses. On the rare occasion a receipt could not be obtained the following applies: No more than \$20 – a memo detailing the item signed by the spending officer. Greater than \$20 – a memo detailing the item, also signed by the responsible manager. If this occurs more than 3 times these expenses will have to be borne by the traveling officer.

3.1.2	Supporting documentation was not submitted within 30 days of the charge in all cases.
2024	195 transactions represented 42% of 464-travel expense claims transactions reviewed were not processed within 30 days of the charge and incurred total finance charges of \$1,784 borne by scoped-in ministries.
2023	348 transactions represented 57% of 613-travel expense claims transactions reviewed were not processed within 30 days of the charge and incurred a total finance charges of \$4,617 borne by scoped-in ministries.
Policy Financial Instructions	10.6.6 Supporting Documentation. The credit card charges will be the responsibility of the card holder if the documentation is not provided within 30 days of the charge. 10.6.13 Payments. The monthly credit card statement must be paid in full and on time to avoid any interest or other late payment charges. Under no circumstances should payment be delayed or late. Payment of any interest, late payment or over credit limit charges incurred on the card will be the personal responsibility of the cardholder, not the department.

3.1.3	Lack of comprehensive and central record of ministerial travels at the ministries available for review on short notice.
2024	Out of the 33 travel events reviewed: 24 travel events disclosed on webpage with understated differences, totaling \$13,268 - o All scoped-in ministries 9 travel events not disclosed on webpage, \$27,473; 1 of these pertains to a paid transaction for travel that did not occur of \$1,353 - o Cabinet Office - o Finance - o Home Affairs - o Tourism, Culture and Sport - o Transport

2023	Out of the 39 travel events reviewed: 24 travel events were disclosed on webpage with understated differences, totaling \$21,213 - o All scoped-in ministries 5 travel events not disclosed on webpage, \$15,863; 3 of these pertains to paid transactions for travel that did not occur of \$6,783 - o Cabinet Office - o Economy and Labour - o Finance - o Transport 2 travel events disclosed on webpage included overstatement errors at \$7,224 - o Economy and Labour - o Transport 8 travel events disclosed on webpage totaling \$24,046, where transaction supports are unavailable at their ministries, as such we were unable to verify - o Cabinet Office - o Finance - o Home Affairs - o Tourism, Culture and Sport
Policy Ministerial Code of Conduct	16.3 Ministers should make it their personal responsibility to approve the size and composition of any Ministerial delegations for which their Ministries are responsible. Each Minister in charge of a Ministry should ensure that his Ministry prepares and maintains a comprehensive and central record of his travels overseas, such record to contain details of the numbers and costs of all Ministerial delegations whose travel has been at public expense. This record should be maintained in such a way that an up-to-date list of visits and the costs of those visits can be made available by Ministries at short notice in the event of their Ministers being asked to account for any travel undertaken by their Ministries. Ministers should take the lead in paring down the size of groups travelling overseas on official business by keeping their own Ministerial delegations as small as possible.

3.1.4	Signed government credit card usage agreement.												
	<table border="1"> <tr> <th>Ministry</th><th>Minister Signed</th></tr> <tr> <td>Cabinet Office</td><td>Yes</td></tr> <tr> <td>Transport</td><td>Yes</td></tr> <tr> <td>Economy and Labour</td><td>Yes</td></tr> <tr> <td>Tourism, Culture, Sport</td><td>Yes</td></tr> <tr> <td>Home Affairs</td><td>Yes</td></tr> </table> o “I have read and understood these Instructions and I hereby acknowledge and accept my responsibility to comply with them. I also hereby authorize the Accountant General to make any deductions from my salary accordingly.”	Ministry	Minister Signed	Cabinet Office	Yes	Transport	Yes	Economy and Labour	Yes	Tourism, Culture, Sport	Yes	Home Affairs	Yes
Ministry	Minister Signed												
Cabinet Office	Yes												
Transport	Yes												
Economy and Labour	Yes												
Tourism, Culture, Sport	Yes												
Home Affairs	Yes												
Policy	10.6 Use of Government Credit Cards												
Financial Instructions	See Appendix II for the full text.												

4. Appendix I

Independent Assurance Report

This independent assurance report was prepared by the Office of the Auditor General of Bermuda on the Ministerial Travel, Meal and Hospitality Expenses. Our responsibility is to provide objective information, advice, and assurance to assist the Legislative Assembly in its scrutiny of the ministerial travel, meal and hospitality expenses and disclosure on the travel calendar webpage.

All work in this audit was performed to a reasonable level of assurance in accordance with the Canadian Standard on Assurance Engagements (CSAE) 3001 – Direct Engagements set out by the Chartered Professional Accountants of Canada (CPA Canada) in the CPA Canada Handbook – Assurance generally accepted in Bermuda. The Office of the Auditor General applies the Canadian Standard on Quality Management 1 – Quality Management for Firms That Perform Audits or Reviews of Financial Statements, or Other Assurance or Related Services Engagements. This standard requires our office to design, implement, and operate a system of quality management, including policies or procedures regarding compliance with ethical requirements, professional standards, and applicable legal and regulatory requirements.

In conducting the audit work, we have complied with the independence and other ethical requirements of the Rules of Professional Conduct of Chartered Professional Accountants of Bermuda and the Code of Professional Conduct of the Office of the Auditor General of Bermuda. Both the Rules of Professional Conduct and the Code are founded on fundamental principles of integrity, objectivity, professional competence and due care, confidentiality, and professional behavior. In accordance with our regular audit process, we obtained the following from management:

- confirmation of management's responsibility for the subject under audit
- acknowledgement of the suitability of the criteria used in the audit
- confirmation that all known information that has been requested, or that could affect the findings or audit conclusion, has been provided
- confirmation that the findings in this report are factually based

PERIOD COVERED BY THE AUDIT: The audit covered the period January 2023 to December 2024. This is the period to which the audit conclusion applies. However, to gain a more complete understanding of the subject matter of the audit, we also examined certain matters outside of this period as deemed necessary.

DATE OF THE REPORT: We obtained sufficient and appropriate audit evidence on which to base our conclusion on October 7, 2025.

5. Appendix II

Government Credit Card Usage Agreement Issued by the Accountant General (per Financial Instruction 10.6)

1. Government credit cards are to be used primarily for overseas travel on official Government business. Use of credit cards for local or other purchases is prohibited without prior approval from the Accountant General. Payment for prohibited purchases will be the responsibility of the cardholder. The Accountant General reserves the right to automatically deduct these amounts from the next salary payment of the cardholder.
2. Expenses charged must be for costs associated with accommodation, meals, local ground transportation and other incidental expenses. Expenses without receipts, excessive private phone calls or any other non-business expense must be paid by the cardholder personally. (See #8)
3. Use of credit cards for personal expenses, even where these form part of an official expense, e.g. hotel accommodation, is strictly prohibited. Any such personal expenses must be paid for by the cardholder and must not be charged to the Government credit card.
4. It is the responsibility of the cardholder to ensure that the statement and supporting documentation is submitted in ample time to avoid any late payment or interest charges.

Any late payment, interest charges or other fees / penalties are the responsibility of the cardholder and must be paid by him/her. The Accountant General reserves the right to deduct these amounts from the next salary payment of the cardholder.
5. Every effort must be made to keep expenses within the approved travel allowance. If the cardholder is aware that the travel allowance rate will be exceeded, approval must be obtained from the Department Head and the Accountant General prior to travel.
6. Every Government Credit Cardholder must make himself/herself aware of the credit limit on the card. The amounts likely to be charged to the card should be estimated in advance for overseas travel. In instances when the card limit is likely to be exceeded for a specific trip, a request for a temporary increase should be made to the Manager, Compliance & Disbursement at least five (5) days prior to travel. Requests received from overseas to increase limits immediately will not be honored.
7. The Government of Bermuda Overseas Travel Expense Claim Form – Exhibit 7 (see attached) should be used to detail and summarize all travel expenses.

Note: Receipts and invoices can be submitted to The Accountant General's Department for payment before the statement is received. A printout of account activity from HSBCNet should always accompany such a payment.
8. Detailed supporting documentation must be provided for every charge on the monthly statement including cash advances and related fees. Typical supporting documentation includes an original invoice or receipt detailing goods or services purchased. Summary receipts are not acceptable. Where no supporting documentation is provided, these charges may become the responsibility of the cardholder. The Accountant General reserves the right to automatically deduct these amounts from the next salary payment for the cardholder in the event that acceptable supporting documentation is not provided..
9. The cardholder is personally responsible for the security of the card and must notify the bank and the Accountant General's Department immediately if the credit card is lost or stolen.

Credit card privileges will be withdrawn, and the cardholder may be surcharged in accordance with Financial Instructions, if the card is not used in accordance with these instructions. (FI Section 2.9 states: – All Government employees are personally responsible for the performance of the financial duties entrusted to them and for inaccuracies in the accounts prepared under their authority, and may be surcharged in this respect under 29(1) of the Public Treasury (Administration and Payments) Act 1969.)
10. The Accountant General reserves the right to exercise discretion and judgment in the application of these instructions.

I have read and understood these Instructions and I hereby acknowledge and accept my responsibility to comply with them. I also hereby authorize the Accountant General to make any deductions from my salary accordingly.

Agreed, signed and dated as below: