

Compliance with Domestic and International Travel Requirements in the Department of Agriculture, Fisheries and Forestry

Department of Agriculture, Fisheries and Forestry

© Commonwealth of Australia 2025

ISSN 1036–7632 (Print)

ISSN 2203–0352 (Online)

ISBN 978-1-923405-71-4 (Print)

ISBN 978-1-923405-72-1 (Online)

Except for the content in this document supplied by third parties, the Australian National Audit Office logo, the Commonwealth Coat of Arms, and any material protected by a trade mark, this document is licensed by the Australian National Audit Office for use under the terms of a Creative Commons Attribution-NonCommercial-NoDerivatives 3.0 Australia licence. To view a copy of this licence, visit <http://creativecommons.org/licenses/by-nc-nd/3.0/au/>.

You are free to copy and communicate the document in its current form for non-commercial purposes, as long as you attribute the document to the Australian National Audit Office and abide by the other licence terms. You may not alter or adapt the work in any way.

Permission to use material for which the copyright is owned by a third party must be sought from the relevant copyright owner. As far as practicable, such material will be clearly labelled.

For terms of use of the Commonwealth Coat of Arms, visit the *Australian honours system* website at <https://www.pmc.gov.au/honours-and-symbols/australian-honours-system>.

Requests and inquiries concerning reproduction and rights should be addressed to:

Chief Operating Officer
Corporate Management Group
Australian National Audit Office
GPO Box 707
Canberra ACT 2601

Or via email:

communication@anao.gov.au.



Canberra ACT
24 November 2025

Dear President
Dear Mr Speaker

In accordance with the authority contained in the *Auditor-General Act 1997*, I have undertaken an independent performance audit in the Department of Agriculture, Fisheries and Forestry. The report is titled *Compliance with Domestic and International Travel Requirements in the Department of Agriculture, Fisheries and Forestry*. I present the report of this audit to the Parliament.

Following its presentation and receipt, the report will be placed on the Australian National Audit Office's website — <https://www.anao.gov.au>.

Yours sincerely



Dr Caralee McLiesh PSM
Auditor-General

The Honourable the President of the Senate
The Honourable the Speaker of the House of Representatives
Parliament House
Canberra ACT

AUDITING FOR AUSTRALIA

The Auditor-General is head of the Australian National Audit Office (ANAO). The ANAO assists the Auditor-General to carry out their duties under the *Auditor-General Act 1997* to undertake performance audits, financial statement audits and assurance reviews of Commonwealth public sector bodies and to provide independent reports and advice for the Parliament, the Australian Government and the community. The aim is to improve Commonwealth public sector administration and accountability.

For further information contact:
Australian National Audit Office
GPO Box 707
Canberra ACT 2601

Phone: (02) 6203 7300
Email: ag1@anao.gov.au

Auditor-General reports and information about the ANAO are available on our website:
<https://www.anao.gov.au>

Audit team

Wendy Preston
Megan Cook
Sky Lo
Liset Campos Manrique
Sung-Hoon Jun
Nathan Daley
Nathan Callaway

Contents

Summary and recommendations.....	7
Background	7
Conclusion	7
Supporting findings	8
Recommendations	10
Summary of entity response	10
Key messages from this audit for all Australian Government entities	11
Audit findings.....	13
1. Background	14
Introduction	14
Previous ANAO audit coverage	20
Rationale for undertaking the audit	21
Audit approach	21
2. Arrangements for managing domestic and international travel.....	22
Has the Department of Agriculture, Fisheries and Forestry developed appropriate policies and procedures for domestic and international travel?	22
Has the Department of Agriculture, Fisheries and Forestry developed appropriate training and education arrangements to promote compliance with domestic and international travel requirements?	33
3. Controls and processes for managing domestic and international travel	36
Has the Department of Agriculture, Fisheries and Forestry effectively implemented controls for domestic travel?	37
Has the Department of Agriculture, Fisheries and Forestry effectively implemented controls for international travel?	42
Has the Department of Agriculture, Fisheries and Forestry implemented effective processes to support compliance with airline lounge and reward and loyalty point arrangements?	47
Does the Department of Agriculture, Fisheries and Forestry have fit-for-purpose arrangements for identifying and responding to non-compliance?	52
Has the Department of Agriculture, Fisheries and Forestry developed appropriate arrangements for reporting to executive management and externally on domestic and international travel?	55
Appendices	61
Appendix 1 Entity response	62
Appendix 2 Improvements observed by the ANAO	63



Audit snapshot

Auditor-General Report No.8 2025–26

Compliance with Domestic and International Travel Requirements in the Department of Agriculture, Fisheries and Forestry



Why did we do this audit?

- ▶ In 2024–25, \$953 million was spent on travel through the whole of Australian Government travel arrangements (the WoAG Arrangements).
- ▶ Australian Government entities should have robust internal arrangements for official travel to: support compliance with the WoAG Arrangements; manage fraud and corruption risks; and foster a culture of integrity.
- ▶ The audit was conducted to provide assurance to the Parliament as to whether the Department of Agriculture, Fisheries and Forestry (DAFF) has effective arrangements to comply with domestic and international travel requirements.



What did we find?

- ▶ DAFF has partly effective arrangements to comply with domestic and international travel requirements.
- ▶ DAFF has largely appropriate arrangements (policies, procedures, training and guidance) for travel. These align with the WoAG Arrangements.
- ▶ DAFF's controls and processes for domestic and international travel are partly effective.



What did we recommend?

- ▶ There were two recommendations to DAFF to improve documentation of approval for travel and the acquittal process.
- ▶ DAFF agreed to the recommendations.



Key facts

- ▶ DAFF's expenditure on travel was within the top ten of non-corporate Commonwealth entities in 2023–24.

\$29.9 m

spent by DAFF on domestic and international travel in 2024–25.

41 (57%)

of domestic travel expenses sampled did not sufficiently document approval and value for money consideration.

38 (100%)

of international travel expenses sampled sufficiently documented the business need and value for money consideration.

Summary and recommendations

Background

1. The whole of Australian Government travel arrangements (the WoAG Arrangements) are coordinated procurements established and managed by the Department of Finance (Finance). The WoAG Arrangements encompass five components: book; fly; stay; drive; and pay (see Table 1.1). The WoAG Arrangements are supported by resource management guides outlining the Australian Government policies for domestic and international travel.
2. All non-corporate Commonwealth entities must comply with all elements of the WoAG Arrangements. Corporate Commonwealth entities and Commonwealth companies may elect to use some or all of the arrangements. As a non-corporate Commonwealth entity, the Department of Agriculture, Fisheries and Forestry (DAFF) must comply with the WoAG Arrangements.

Rationale for undertaking the audit

3. In 2024–25, Australian Government entities spent \$953 million on travel through the WoAG Arrangements. The purpose of whole of government policy for travel is to maximise value for money. The approach of an entity to official travel can indicate whether the entity is behaving with integrity by meeting the intent of the WoAG Arrangements. There has been parliamentary and public interest in relation to government travel arrangements and expenditure. The audit was conducted to provide assurance to the Parliament as to whether DAFF has complied with domestic and international travel requirements.
4. This audit is part of a series of audits on compliance with the WoAG Arrangements. The entities included in the series are: Department of Industry, Science and Resources; DAFF; Civil Aviation Safety Authority; Australian Criminal Intelligence Commission; and Services Australia.

Audit objective and criteria

5. The objective of the audit was to assess whether DAFF has effective arrangements to comply with domestic and international travel requirements.
6. To form a conclusion against the objective, the ANAO adopted two high-level audit criteria.
 - Did DAFF have appropriate arrangements to manage domestic and international travel in accordance with whole of Australian Government requirements?
 - Has DAFF implemented effective controls and processes for domestic and international travel in accordance with its policies and procedures?

Conclusion

7. DAFF has partly effective arrangements to comply with domestic and international travel requirements. The effectiveness of DAFF's arrangements has been undermined by the inadequate recording of business need for travel and approvals to demonstrate value for money. DAFF has reported a range of issues in relation to the WoAG Arrangements to the Department of Finance.

The Department of Finance has reported that it is implementing recommendations from the 'Review of Australian Government Travel Policies'.

8. DAFF has established largely appropriate arrangements for managing domestic and international travel in accordance with the WoAG Arrangements. DAFF has developed policies and procedures, and provides training and guidance material to officials to assist in promoting compliance. The department is implementing recommendations from two internal audits which aim to address gaps in its control framework for travel, particularly in relation to approval arrangements.

9. DAFF's controls and processes for domestic and international travel are partly effective.

- Data indicates that DAFF booked flights in accordance with the WoAG Arrangements related to 'Lowest Practical Fare' and 'International Best Fare'.
- For domestic travel, there were insufficient records to clearly demonstrate consideration of value for money and records were not stored to allow for efficient assurance of the acquittal of travel-related expenses.
- DAFF did not have an overarching approach to checking compliance with the WoAG Arrangements and internal requirements for travel, including in relation to whether officials are being influenced by preferences for particular airlines and airline lounge and reward and loyalty point arrangements.

Supporting findings

Arrangements for managing domestic and international travel

10. DAFF has developed policies and procedures for domestic and international official travel that align with the WoAG Arrangements. Official travel is considered in the context of the department's fraud and corruption risk assessment. DAFF has completed internal audits related to travel. Recommendations from these are being implemented to address gaps in relation to travel bookings and approvals, acquittal and monitoring and reporting activities. (See paragraphs 2.2 to 2.33)

11. DAFF requires all officials to complete training on the duties and responsibilities of officials under the *Public Governance, Performance and Accountability Act 2013*, including on the appropriate use of public resources. As of 30 June 2025, the compliance rate for the completion of mandatory training was 87 per cent. DAFF introduced non-mandatory travel-specific training in December 2024. Guidance material is available to officials through different channels. (See paragraphs 2.34 to 2.47)

Controls and processes for managing domestic and international travel

12. For domestic travel, there was insufficient documentation of the need to travel and appropriate approvals in the sample tested. This limits DAFF's ability to demonstrate consideration of value for money. For all domestic flights, 99 per cent were recorded as complying with the lowest practical fare policy — 44 per cent were the 'lowest fare' (cheapest). Of the travel reviewed by the ANAO:

- 58 per cent did not have a travel request created in the department's travel and credit card expense management system;
 - 57 per cent were not approved in line with departmental policy;
 - 96 per cent of bookings were made through the contracted supplier, as required;
 - 43 per cent of accommodation expenses were above the subscription service rates without delegate approval; and
 - 64 per cent of travel-related expenses were acquitted within 10 days, as required, and 36 per cent were not. (See paragraphs 3.3 to 3.28)
13. DAFF has implemented largely effective controls for international travel.
- Business reasons, risk assessment and approval for international travel are routinely documented in the International Travel Proposal form.
 - Data indicated that international flights were booked in accordance with the International Best Fare requirement of the WoAG Arrangements, with 85 per cent of flights being booked as the 'lowest fare' (cheapest).
 - When approving the acquittal of international travel expenditure, the delegate does not have visibility of the total approved cost of the travel, impacting their ability to provide informed approval.
 - Thirty-three per cent of travel related expense reports were not acquitted within 14 days, as required. (See paragraphs 3.29 to 3.46)
14. DAFF does not collect information on officials' membership of airline loyalty programs and its conflict-of-interest policy does not provide guidance in relation to memberships of loyalty programs or lounges. DAFF is unable to assess whether officials are being influenced by preferences for particular airlines, and airline lounge and reward and loyalty point arrangements when planning and undertaking official travel. DAFF requires officers to declare gifted airline lounge memberships and upgrades as a result of status credits accrued for official travel. The average time for reporting gifts and benefits accepted by DAFF officials from Qantas and Virgin Australia was 90 days — between 1 July 2022 and 31 December 2024. DAFF officials declared 15 gifts and benefits from Qantas or Virgin Australia. Eight of these were invitation-only lounge memberships. The department purchases lounge memberships for officials who undertake 'significant' travel — approval, including value for money considerations, was not evident for 78 per cent of purchases reviewed by the ANAO. No lounge memberships were reported by DAFF's SES officials in their declaration of material interests. (See paragraphs 3.49 to 3.74)
15. DAFF has some processes in place to identify and respond to non-compliance, but it lacks an overarching approach to assessing compliance with both the requirements and the objectives of the WoAG Arrangements. DAFF has reported that it has implemented an internal audit recommendation to monitor areas of non-compliance relating to: domestic business class travel; attachment of the PGPA subsection 23(3) approval to travel expenditure approvals; and accommodation booked outside of the WoAG Arrangements. Travel-related non-compliance mostly involves the misuse of credit cards. (See paragraphs 3.76 to 3.89)
16. Reporting is provided to executive management on international travel. Reporting of non-compliance with subsection 23(3) of the PGPA Act is provided to governance committees,

the Chief Finance Officer and division heads, and includes disaggregation for official travel. The department responded to 31 travel-related Questions on Notice between July 2022 and February 2025. Twenty-one (70 per cent) were responded to on time. There were mapping differences in reporting on travel expenditure in DAFF's annual report for 2022–23 and 2023–24 which meant car hire and WoAG travel provider fees were not included in the overall travel costs. DAFF advised that it has reported a range of issues to the Department of Finance relating to the WoAG Arrangements. (See paragraphs 3.91 to 3.106)

Recommendations

Recommendation no. 1 The Department of Agriculture, Fisheries and Forestry document the business need and *Public Governance, Performance and Accountability Act 2013* subsection 23(3) approval in order to support value for money with respect to domestic travel. This should be appropriately stored in the department's records management system and expense management system.

Paragraph 3.14

Department of Agriculture, Fisheries and Forestry response:
Agreed.

Recommendation no. 2 The Department of Agriculture, Fisheries and Forestry ensures that international travel approvals, including the *Public Governance, Performance and Accountability Act 2013* subsection 23(3) or section 71 approval, are documented and retained in the department's records management system and the expense management system to support the travel acquittal process and identification of any non-compliance.

Paragraph 3.47

Department of Agriculture, Fisheries and Forestry response:
Agreed.

Summary of entity response

17. The proposed audit report was provided to DAFF. DAFF's summary response is provided below. The full response from DAFF is at Appendix 1. Improvements observed by the ANAO during the course of the audit are listed in Appendix 2.

Department of Agriculture, Fisheries and Forestry

The department is committed to ensuring domestic and international travel arrangements comply with WoAG requirements and welcomes the ANAO's observations that it has established largely appropriate arrangements for managing domestic and international travel in accordance with the WoAG arrangements.

The department acknowledges the two recommendations, which focus on improving domestic travel approval documentation and record keeping for domestic and international travel approvals, with work already underway to address these recommendations.

I can confirm the department has been methodically investing in its travel operations over the past 24 months. The audit testing conducted by the ANAO covered a period of unprecedented change

for the department with major Machinery of Government changes fragmenting existing resourcing between agencies, and the mandated requirement to transition to the new WoAG travel provider. While managing these challenges, the department has taken the initiative to conduct two travel internal audits while concurrently uplifting processes, systems and resources to ensure we have a strong, compliant and accountable travel function.

Key messages from this audit for all Australian Government entities

18. Below is a summary of key messages, including instances of good practice, which have been identified in this audit and may be relevant for the operations of other Australian Government entities.

Governance and risk management

- Policies, training and controls for travel should be informed by an assessment of entity specific context and risks of official travel.
- Monitoring and reporting should provide visibility of compliance with whole of Australian Government requirements and be commensurate with entity expenditure.
- Entities need to ensure delegates have access to all the relevant information to make an informed decision that expenditure is appropriate.

Audit findings

1. Background

Introduction

1.1 Australian Government officials undertake domestic and international travel for the purpose of achieving the objectives of their entities. Official travel is:

any travel where a Commonwealth entity is ultimately responsible for any of the direct or indirect costs associated with that travel ... This includes travel by officials, contractors and consultants to undertake work duties at the direction of the employer to achieve one or more Commonwealth objectives.¹

Australian Government framework for travel

1.2 The Commonwealth resource management framework governs how Australian Government entities use and manage public resources. The foundation of the framework is the *Public Governance, Performance and Accountability Act 2013* (the PGPA Act) which requires accountable authorities to promote the proper use and management of public resources.²

1.3 The Commonwealth Procurement Rules (CPRs) are issued by the Minister for Finance under section 105B of the PGPA Act. Compliance with the CPRs is mandatory for officials of non-corporate Commonwealth entities (NCEs). The CPRs require NCEs to use coordinated procurements where they exist.³ The whole of Australian Government travel arrangements (the WoAG Arrangements) are coordinated procurements established and managed by the Department of Finance (Finance). All NCEs must comply with all elements of the WoAG Arrangements. Corporate Commonwealth entities (CCEs) and Commonwealth companies may elect to use some or all of the arrangements.

1.4 Finance has published model accountable authority instructions, which include model instructions for official travel (see Box 1).⁴

Box 1: Model accountable authority instructions for official travel — non-corporate Commonwealth entities

You must:

- not enter into an arrangement for official travel unless you have been delegated, or authorised to exercise, power to enter into an arrangement of this type

1 Department of Finance, *Model accountable authority instructions for non-corporate Commonwealth entities*, Finance, 2021, p. 40, available from <https://www.finance.gov.au/government/managing-commonwealth-resources/managing-risk-internal-accountability/risk-internal-controls/accountable-authority-instructions-aais-rmg-206> [accessed 7 January 2025].

2 *Public Governance, Performance and Accountability Act 2013*, paragraph 15(1)(a).

3 Coordinated procurements are whole-of-government arrangements for procuring goods and services.

4 Accountability authority instructions are 'written instruments that may be issued by the accountable authority to instruct officials on matters relating to the finance law ... AAls include instructions that the accountable authority expects officials to follow when exercising powers and carrying out functions and duties under the PGPA Act'. Department of Finance, *Accountable Authority Instructions (AAls)* (RMG 206), Finance, Canberra, 2023, available from <https://www.finance.gov.au/government/managing-commonwealth-resources/managing-risk-internal-accountability/risk-internal-controls/accountable-authority-instructions-aais-rmg-206> [accessed 7 May 2025].

- act in accordance with the Commonwealth Procurement Rules (CPRs) when procuring official travel (see *Procurement*).

Where the government has established coordinated procurements for a particular travel activity, you must use the arrangement established for that activity, unless:

- an exemption has been provided in accordance with the CPRs or reimbursement is to be provided to a third party (i.e. a non-Commonwealth traveller that cannot access coordinated travel procurements) for airfares, accommodation or car rental; or
- a travel allowance is to be provided for accommodation arrangements.

You must:

- use the Australian Government's contracted travel management company (TMC) [also referred to as the travel management services supplier] to book domestic and ex-Australia international airfares under the Deed of Standing Offer for the Provision of Whole of Australian Government Travel Management Services unless the air travel is charter travel, in which case the use of the TMC is recommended but not mandatory
- use the contracted accommodation program management services provider for domestic accommodation under the Deed for the Provision of Accommodation Program Management Services to the Australian Government
- use the contracted car rental service providers for domestic car rentals under the Deed for the Provision of Car Rental Services to the Australian Government
- use the contracted travel card and related services provider for card payment services under the Deed for the Provision of Travel and Related Card Services to the Australian Government
- not accrue reward and loyalty points (such as frequent flyer points), however status points may be accrued.

Whole of Australian Government travel arrangements

1.5 The WoAG Arrangements commenced in 2010 and aim to:

- reduce travel costs by aggregating government buying power to obtain discounted pricing;
- decrease administrative costs for suppliers and entities by removing procurement duplication;
- simplify processes by integrating technology, unifying pricing and aligning systems;
- optimise savings by promoting behavioural change; and
- support Australian Government policies.⁵

1.6 The WoAG Arrangements encompass five components as outlined in Table 1.1.

5 Department of Finance, *Whole of Australian Government Travel Arrangements*, About the Travel Arrangements, Finance, 5 July 2024, available from <https://www.finance.gov.au/government/travel-arrangements/about-travel-arrangements> [accessed 7 January 2025].

Table 1.1: Whole of Australian Government travel arrangements — services and suppliers, September 2025

Component	Services	Suppliers (as at November 2025)
Book ^a	The travel management services (TMS) supplier ^b provides booking services for air travel, hotel, bus, sea, rail, car rental, ground transport services, and charter flights. In addition, 24/7 support and entity travel reports are provided.	Corporate Travel Management (CTM)
Fly ^c	Domestic and international air travel suppliers. The panel of airlines is not exclusive. ^d Airlines included in the panel provide 'discounted fares and beneficial fare conditions' to the Australian Government ^e .	Panel of 18 airlines • three domestic airlines, and • 17 international airlines.
Stay ^a	All domestic accommodation must be booked through the TMS supplier. Booking international accommodation through the TMS supplier is encouraged but is not required under the WoAG Arrangements.	CTM
Drive ^e	Domestic vehicle rental services supplier. Bookings can be made via the TMS supplier or directly with the vehicle rental services supplier via a WoAG portal.	Hertz
Pay ^f	Travel and Procurement Payments Services. For official travel booked via the TMS supplier, entities are required to use a 'lodge card'. ^g Commonwealth credit cards may be utilised for other expenses associated with travel such as meals and incidentals or overseas accommodation.	National Australia Bank (NAB)

Note a: Standing Offer Notice ID SON3979293, available from <https://www.tenders.gov.au/Son/Show/b3e4c6ad-ab57-4d46-a3c6-d0ce7b083ac7> [accessed 30 June 2025].

Note b: The TMS supplier is known as the Travel Management Company (TMC).

Note c: Standing Offer Notice ID SON3337469, available from <https://www.tenders.gov.au/Son/Show/606ca6fd-c615-d94c-905e-491969f2a3ba> [accessed 30 June 2025].

Note d: Given the panel is not exclusive, entities are permitted to book both domestic and international air travel with non-panel airlines however this must be booked through the TMS supplier.

Note e: Standing Offer Notice ID SON35277487, available from <https://www.tenders.gov.au/Son/Show/1545a9af-e0d4-bab4-60d4-e03aed0558db> [accessed 30 June 2025].

Note f: Standing Offer Notice ID SON3637640, available from <https://www.tenders.gov.au/Son/Show/ad2d8b17-c42e-4601-a757-72568eafa384> [accessed 30 June 2025].

Note g: A virtual card (lodge card) is the digital number stored in the TMS supplier user profile.

Source: Department of Finance, *Whole of Australian Government Travel Arrangements*, About the Travel Arrangements and Department of Finance, *Whole of Australian Government Procurement*.

Lowest Practical Fare and International Best Fare

1.7 The WoAG Arrangements are supported by resource management guides (RMGs) outlining the Australian Government policies for domestic and international air travel. The policies require travellers to select the 'Lowest Practical Fare' (LPF) for domestic flights and the 'International Best Fare' (IBF) for international flights.

- The LPF is ‘the lowest fare available at the time the travel is booked on a regular service (not a charter flight), that suits the practical business needs of the traveller’.⁶
- The IBF is ‘the lowest fare on the day the travel is booked on a regular scheduled service (not a charter flight), that suits the practical business needs of the traveller and maximises overall value for money for the total cost of the trip’.⁷

1.8 The LPF and IBF policies allow officials to book flights which are not the lowest fare. Officials are to select a booking code to explain why the lowest fare has not been chosen (see Table 1.2). Booking codes 1 to 6 are compliant with LPF and IBF policies. If flights are not compliant, then code 7 (‘Outside of LPF policy’) is to be used.

Table 1.2: Policy booking codes for LPF and IBF

Booking code		Requirement
1	Lowest fare	Domestic: This is the cheapest available fare taking into account the 1-hour window. ^a International: This is the cheapest fare taking into account the 24-hour booking window. ^b
2	Timing, routing, connection or baggage charges	Domestic: Where the fare selected is not the lowest fare because it: is the most direct route; ensures connections for further flights are met; or takes into account excess baggage fees. International: Where the fare selected is not the lowest fare because it: is the most direct route; ensures connections for further flights are met; includes baggage allowances or value-adds offered by WoAG contracted airlines; or takes into account excess baggage fees.
3	Approval or entitlement to travel at a higher fare class	Domestic: All air travel is to be at the LPF in economy class unless there is a business case or entitlement to travel outside these guidelines. In these circumstances, officials are still required to obtain the lowest practical fare within the entitlement. International: All air travel is to be at the IBF in the appropriate class ^c (having regard to internal travel policy) unless there is a business case or entitlement to travel outside these guidelines. In these circumstances, officials are still required to obtain the IBF within the entitlement.
4	Health issues	Health issues for officials requiring certain facilities. A medical certificate is required to support use of this code.
5	Personal responsibilities	Impact on personal responsibilities such as family.
6	Require flexibility to change booking	Where flexibility is required for air travel, travel bookers must consider selecting a semi-flexible fare type instead of a fully flexible fare.

6 Department of Finance, *Domestic Travel Policy* (RMG 404), available from <https://www.finance.gov.au/publications/resource-management-guides/domestic-travel-policy-rmg-404> [accessed 8 January 2025].

7 Department of Finance, *Official International Travel — Use of the best fare of the day* (RMG 405), available from <https://www.finance.gov.au/publications/resource-management-guides/official-international-travel-use-best-fare-day-rmg-405> [accessed 21 January 2025].

Booking code	Requirement
7	Outside of LPF policy Preference for particular aircraft or airlines, availability of access to airline lounges, accumulation of airline benefits such as reward or loyalty points (including status credits).

Note a: According to *Domestic Travel Policy* (RMG 404), the one hour 'time window' is used by the TMS supplier to 'monitor whether the lowest practical fare has been selected and assess potential missed savings ... For outbound flights, the window commences 1 hour prior to the booked flight ... For inbound flights, the window commences 1 hour after the booked flight'.

Note b: According to *Official International Travel — Use of the best fare of the day* (RMG 405), the TMS supplier 'applies the 24-hour window to the booked flight time from the point of departure to monitor whether the international best fare has been selected.'

Note c: *Official International Travel — Use of the best fare of the day* (RMG 405), requires officials to select 'business class or equivalent or lower class airfare'.

Source: *Domestic Travel Policy* (RMG 404) and *Official International Travel — Use of the best fare of the day* (RMG 405).

1.9 The RMGs set out additional guidance for travellers and approvers. Two key considerations for officials undertaking and approving domestic and international travel are 'value for money' and 'necessity of travel'.

- Value for money requires 'the use of Commonwealth resources in an efficient, effective, economical and ethical manner that is consistent with the policies of the Commonwealth ... Accordingly, when booking travel, officials must make decisions based on impartial consideration of fares available'.
- Delegates, in approving official travel, 'must be satisfied there is a demonstrated business need for the travel' and that 'Air travel must only be undertaken where other communication tools, such as teleconferencing and videoconferencing, are ineffective'.

Review of travel purchasing policies

1.10 The Australian Government published the Aviation White Paper in August 2024. The White Paper contains 56 new policy initiatives. Under the banner of a 'competitive and efficient aviation sector', Initiative 17 is:

Review government travel purchasing policies to consider whether changed policy settings could better support competition. The Department of Finance will conduct the review in 2024.⁸

1.11 Finance finalised the 'Review of Australian Government Travel Policies' in December 2024.⁹ The review made seven recommendations.

- Recommendation 1: Publish WoAG Arrangements usage and expenditure.
- Recommendation 2: Update policy to explicitly deal with flight upgrades.
- Recommendation 3: Return to market for a full re-tender of the Airline Panel following consultation with the market on the approach to status credits.

8 Australian Government, *Aviation White Paper — Towards 2050*, August 2024, p. 14, available from <https://www.infrastructure.gov.au/infrastructure-transport-vehicles/aviation/aviation-white-paper> [accessed 7 January 2025].

9 Department of Finance, *Report of the Review of Australian Government Travel Policies*, 24 December 2024, available from <https://www.finance.gov.au/publications/reviews/report-review-australian-government-travel-policies> [accessed 1 August 2025].

- Recommendation 4: Create one Government Travel Policy, including mandating economy class for flights under three hours, enhanced guidance on gifts and benefits and setting a two year review period.
- Recommendation 5: Booking codes for best value fare to be updated to include a justification for selecting the booking code for delegate consideration.
- Recommendation 6: Work with the contracted Travel Management Company to improve services.
- Recommendation 7: Remove the requirement for accountable authorities to seek Ministerial approval for international travel over a certain threshold.

1.12 The government's response to the recommendations is detailed in the 'Review of Australian Government Travel Policies — What We're Doing'. The review and response were published on Finance's website on 1 August 2025.¹⁰

Airline loyalty programs

1.13 Airline loyalty programs (also known as frequent flyer programs) are customer loyalty schemes. According to the Australian Competition and Consumer Commission, customer loyalty schemes offer points or discounts with the purpose of increasing repeat business. There are two types of points offered by Australian airlines through their airline loyalty programs.¹¹

- Reward points (also known as frequent flyer points) are awarded to travellers who are members of the airline's loyalty program for certain flights.
- Status credits are also awarded to members of the airline's loyalty program on certain flights and contribute to the tier status of a loyalty program membership (e.g. silver or gold).

1.14 Reward points and status credits can be accrued by travellers who are members of an airline's loyalty program. Since commencement of the WoAG Arrangements in 2010, government policy prohibits the accrual of reward points for official travel. The accrual of status credits is permitted for official travel.

Airline lounge access

1.15 Membership of an airline lounge is separate to membership of an airline loyalty program and membership to a loyalty program does not in itself provide access to airline lounges. Membership of an airline lounge alone does not entitle members to accrue reward points or status credits. Access to airline lounges is available to travellers based on the class of travel, i.e. business and first class.

1.16 Airline lounges can be accessed by officials who have purchased a membership. Both Qantas and Virgin Australia offer discounted lounge memberships as part of the WoAG Arrangements to

10 Department of Finance, *Review of Australian Government Travel Policies — What We're Doing*, undated, available from <https://www.finance.gov.au/publications/reviews/report-review-australian-government-travel-policies> [accessed 1 August 2025].

11 The Department of Finance uses the term 'reward and loyalty points' to collectively refer to reward points and status credits.

Commonwealth officials. The discount is available if the entity purchases a membership for an official, or if the official purchases it themselves in a personal capacity.

1.17 Qantas' Chairmans Lounge and Virgin Australia's Beyond are invitation-only memberships that provide access to premium airline lounges. Qantas and Virgin Australia may gift memberships of airline lounges, including invitation-only lounges, to senior officials. The Australian Public Service Commission requires the annual reporting of gifted airline lounge memberships by agency heads.¹²

Department of Agriculture, Fisheries and Forestry — official travel

1.18 The Department of Agriculture, Fisheries and Forestry (DAFF) is responsible for enhancing Australia's 'agricultural, fisheries and forestry industries'. DAFF creates new, and maintains existing, 'agricultural export opportunities, to provide gains for Australian agriculture'. It 'manage[s] biosecurity risks to protect Australia's multi-billion dollar agricultural industries and way of life'.¹³

1.19 In 2024–25, DAFF's total resourcing was \$3.4 billion, and the average staffing level was 6,171. The Secretary is the accountable authority for the purposes of the PGPA Act and the agency head for the *Public Service Act 1999*.

1.20 DAFF is a non-corporate Commonwealth entity and it must comply with all elements of the WoAG Arrangements. In 2024–25, DAFF reported its expenditure on travel as \$29.9 million compared to \$26.2 million in 2023–24. Expenditure of this volume puts DAFF within the top ten travel expenditure by non-corporate Commonwealth entities in 2023–24.

Previous ANAO audit coverage

1.21 Previous ANAO audits have identified issues in other entities with respect to credit cards and travel. In 2023–24, the ANAO conducted a series of audits assessing compliance with corporate credit card requirements.¹⁴ These reports identified:

- positional authority risks with expenditure on travel and credit cards being approved by officials junior to the traveller;
- approval of travel not being provided prior to travel being undertaken; and
- failure to identify, record or respond to instances of non-compliance with travel requirements.

12 The requirement is 'in circumstances where agency heads are gifted airline lounge memberships (including those which are invitation-only), these must be recorded in their agency's gifts and benefits register annually or when circumstances change, such as a new or cancelled membership.' Australian Public Service Commission, *Guidance for Agency Heads — Gifts and Benefits*, APSC, 2021, available from <https://www.apsc.gov.au/working-aps/integrity/integrity-resources/guidance-agency-heads-gifts-and-benefits> [accessed 20 February 2025].

13 Department of Agriculture, Fisheries and Forestry, *Who we are, Our Role*, DAFF, Canberra, 2024, available from <https://www.agriculture.gov.au/about/who-we-are> [accessed 21 January 2025].

14 The ANAO developed the Audit Lessons — Management of Corporate Credit Cards to share lessons from these audits. Available from <https://www.anao.gov.au/work/insights/management-of-corporate-credit-cards> [accessed 16 April 2025].

Rationale for undertaking the audit

1.22 In 2024–25, Australian Government entities spent \$953 million on travel through the WoAG Arrangements. The purpose of whole-of-government policy for travel is to maximise value for money. The approach of an entity to official travel can indicate whether the entity is behaving with integrity by meeting the intent of the WoAG Arrangements. There has been parliamentary and public interest in relation to government travel arrangements and expenditure. The audit was conducted to provide assurance to the Parliament whether DAFF has complied with domestic and international travel requirements.

Audit approach

Audit objective, criteria and scope

1.23 The objective of the audit was to assess whether DAFF has effective arrangements to comply with domestic and international travel requirements.

1.24 To form a conclusion against the objective, the ANAO adopted two high-level audit criteria.

- Did DAFF have appropriate arrangements to manage domestic and international travel in accordance with whole of Australian Government requirements?
- Has DAFF implemented effective controls and processes for domestic and international travel in accordance with its policies and procedures?

1.25 The audit primarily examined DAFF's management of domestic and international travel from 1 July 2022 to 31 December 2024.

Audit methodology

1.26 To address the audit objective, the audit methodology included:

- reviewing legislative, policy and internal frameworks;
- examining DAFF's policies, procedures, travel management systems, assurance and reporting activities;
- meeting with DAFF officials;
- testing the effectiveness of DAFF's control framework for travel;
- analysing whole of Australian Government and DAFF level data from the WoAG travel management system; and
- reviewing citizen contributions to the audit.

1.27 The audit was conducted in accordance with ANAO Auditing Standards at a cost to the ANAO of approximately \$452,102.

1.28 The team members for this audit were Wendy Preston, Megan Cook, Sky Lo, Liset Campos Manrique, Sung-Hoon Jun, Nathan Daley and Nathan Callaway.

2. Arrangements for managing domestic and international travel

Areas examined

This chapter examines whether the Department of Agriculture, Fisheries and Forestry (DAFF) has developed appropriate arrangements for the management of domestic and international travel in accordance with the whole of Australian Government arrangements (WoAG Arrangements).

Conclusion

DAFF has established largely appropriate arrangements for managing domestic and international travel in accordance with the WoAG Arrangements. DAFF has developed policies and procedures, and provides training and guidance material to officials to assist in promoting compliance. The department is implementing recommendations from two internal audits which aim to address gaps in its control framework for travel, particularly in relation to approval arrangements.

2.1 Entities need to establish arrangements for managing official travel in line with the requirements of the WoAG Arrangements. Policies and procedural guidance, as well as training, should be available and easily accessible to all officials. These arrangements should be informed by entity-specific risks.

Has the Department of Agriculture, Fisheries and Forestry developed appropriate policies and procedures for domestic and international travel?

DAFF has developed policies and procedures for domestic and international official travel that align with the WoAG Arrangements. Official travel is considered in the context of the department's fraud and corruption risk assessment. DAFF has completed internal audits related to travel. Recommendations from these are being implemented to address gaps in relation to travel bookings, including approvals, acquittal and monitoring and reporting activities.

Assessment of risk

Enterprise risks

2.2 DAFF's Risk Management Accountable Authority Instructions and Enterprise Risk Management Framework and Policy (October 2024) set the department's 'approach, expectations and provides guidance for effective risk management'. DAFF has nine enterprise risks in its 2025–26 Corporate Plan.¹⁵ None of the enterprise risks are directly relevant to official travel.

15 Department of Agriculture, Fisheries and Forestry, *Corporate Plan 2025–26*, DAFF, Canberra, 2025, Table 3 Enterprise Risks, p. 21 <https://www.agriculture.gov.au/sites/default/files/documents/daff-corporate-plan-2025-26.pdf> [accessed 11 September 2025].

Fraud and corruption risks

2.3 The Public Governance, Performance and Accountability Fraud and Corruption Rule establishes a requirement for an accountable authority to take all reasonable measures to prevent, detect and deal with fraud relating to the entity.¹⁶

2.4 DAFF's fraud and corruption control framework is made up of two components:

1. The Control Plan, which provides the framework and associated guidance for identifying, deterring, detecting, investigating, and reporting fraud and corruption.
2. The Risk Assessment, which identifies areas within the department that are potentially at risk of fraudulent and corrupt practices and provides an assessment on the effectiveness of existing controls.

2.5 As of August 2025, DAFF's fraud and corruption control plan (control plan) and its fraud and corruption risk assessment (fraud risk assessment) were last updated in June 2024. In the fraud risk assessment, 61 fraud risks were assessed. The ANAO identified five fraud risks as being relevant to travel:

- 'fraudulent claim for leave and/or other entitlements' rated medium but outside the tolerance of low for this risk category;
- 'fraudulently claim travel' rated low and within tolerance;
- 'fraudulent approval of travel allowance' rated low and within tolerance;
- 'fraudulent claim for travel allowance' rated low and within tolerance; and
- 'fraudulent use of digital cab charge voucher(s)' rated low and within tolerance.¹⁷

2.6 The DAFF fraud risk assessment includes existing risk controls and identified control weaknesses for these risks. A key division for each risk is identified.¹⁸ The fraud risk assessment does not identify any treatments, treatment owners, implementation timeframes for treatments or a plan for monitoring and review.

Divisional risks

2.7 DAFF's Finance and Investment Division is responsible for the department's framework for official travel. The division's risk register (July 2025) identifies risks of 'Inadequate management of financial resources to achieve the departments strategic objectives' and 'Lack of understanding from departmental staff on the financial systems and processes in place'.

16 Public Governance, Performance and Accountability Rule 2014, section 10. The Fraud and Corruption Rule sets out minimum standards for accountable authorities for managing the risk and incidents of fraud and corruption relating to their entity.

17 According to the Enterprise Risk Management Framework and Policy (2024), DAFF has 'a low tolerance for fraud, corruption, or breaches of our obligations' and 'a low tolerance for the poor prioritisation of resources, the inappropriate spending of public money, and inaccurate financial reporting'.

18 A key division is defined by DAFF as the risk owner and is responsible for facilitating effective fraud and corruption management and providing targeted insights to assist with the assessment of risk controls and strategies, as well as in identifying control weaknesses.

2.8 For these risks, the ANAO identified the following controls as having relevance to travel:

- Maintain and invest in fit-for-purpose infrastructure, systems and digital technology.
- Ensure ongoing awareness, compliance, and alignment with relevant departmental frameworks and policies.
- Fit for purpose tools and guidance material are made available to all staff at all levels on the Source [DAFF's intranet].

2.9 As of July 2025, the Finance and Investment Division had assessed each of these controls as 'partially effective'. No further information is provided about the rationale for this assessment of control effectiveness. It is not evident the extent to which the department's framework for official travel is incorporated into these controls.

2.10 The risk ratings for these risks, as of July 2025, were 'medium' and within acceptable tolerance.

Framework for official travel

2.11 DAFF defines official travel as 'Secretary approved travel away from the employee's usual work locality including travel between an employee's usual locality and a temporary alternative locality. It does not apply to travel undertaken in the course of an employee's usual or assigned activities at the employee's usual or temporary alternative locality'.¹⁹

2.12 Within the Finance and Investment Division, a team is responsible for policies and oversight for travel and credit cards. DAFF's framework for domestic and international travel is established through:

- instructions in the DAFF Accountable Authority Instructions (AAIs);
- DAFF's financial delegations instrument;
- the DAFF Enterprise Agreement (2024–27); and
- policy documents including the Travel Policy, the Travel Regulation Manual, the International Travel Handbook and the Commonwealth Credit Card Policy.

Accountable authority instructions

2.13 DAFF's AAIs (August 2024) set out the Secretary's instructions related to official travel:

Official travel should only be undertaken when there is a demonstrated business need and when other communication tools, such as teleconferencing and videoconferencing, are an ineffective option.

2.14 With respect to official travel, DAFF's AAIs are consistent with the model AAIs issued by the Department of Finance. DAFF's AAIs provide entity-specific instructions in relation to approval of travel, application of the Commonwealth Procurement Rules, use of established coordinated procurement arrangements, use of a virtual (lodge) card, and not accruing reward or loyalty points.

19 Department of Agriculture, *Fisheries and Forestry Enterprise Agreement 2024–2027*, Canberra, 2024, section 589, p. 78, available from <https://www.agriculture.gov.au/about/jobs/conditions> [accessed 21 January 2025].

The AAls link to other relevant material such as: legislative requirements; Australian Government policies and guidance; related AAls; and other internal material.²⁰

2.15 The AAls were updated four times during the period 1 July 2022 to 31 December 2024: in January 2023; August 2023; August 2024 and November 2024. While all AAls were approved by the accountable authority, they did not record the date of effect, have version control or document the accountable authority approval. The AAls released in July 2025 include the date of effect, but do not document approval by the accountable authority.

Financial delegations instrument

2.16 The DAFF PGPA (Accountable Authority) Delegations and Sub-Delegations (October 2024) establishes a delegation in line with subsection 23(3) of the of the *Public Governance, Performance and Accountability Act 2013* (PGPA Act) for the power to approve expenditure for procurements.²¹

- Delegations for domestic travel apply to APS 5 and 6 officers to a limit of \$80,000, then EL1 to SES Band 3 officers to the limit of available funds.
- International travel is limited to \$49,999 and to all SES Band 3 officers and three other SES officers.²²

2.17 The department's previous financial delegations instruments (1 December 2020 and 1 September 2022) enabled approval for domestic travel expenditure by APS 4 officers and above. DAFF advised the ANAO on 10 June 2025 that delegation changes in October 2024 were as a result of 'a general review of financial delegations'.

Department of Agriculture, Fisheries and Forestry Enterprise Agreement 2024–27

2.18 DAFF's enterprise agreement includes travel and location-based conditions.

Employees required to travel for official work purposes will have their accommodation, meals, and other incidental expenses met by the department. The department currently utilises a range of facilities to meet the travel costs of employees including booking systems, credit or travel cards and employee allowances and payments.

2.19 DAFF pays meal and incidental allowances to officials. It uses the Commonwealth Allowance Subscription Service rates to determine daily maximum meal and incidental rates.²³

2.20 The enterprise agreement provides for a private accommodation allowance to cover reasonable expenses incurred while staying at non-commercial accommodation. There is provision for private vehicle allowance when utilising a private vehicle while on official business.

20 Other relevant departmental policies related to conflicts of interest, integrity procurement and gifts and benefits.

21 Subsection 23(3) of the PGPA Act provides for the accountable authority to 'on behalf of the Commonwealth, approve a commitment of relevant money for which the accountable authority is responsible'.

22 First Assistant Secretary Biosecurity Operations Division may only exercise a delegation for international travel where the travel is for the purpose of biosecurity operations activities.

23 The Australian Public Service Commission operates the Commonwealth Allowance Subscription Service which provides subscribing Commonwealth agencies with suggested rates for a range of employment-related allowances. The fee for the service, based on the number of DAFF employees, was \$9,500 for 2024–25.

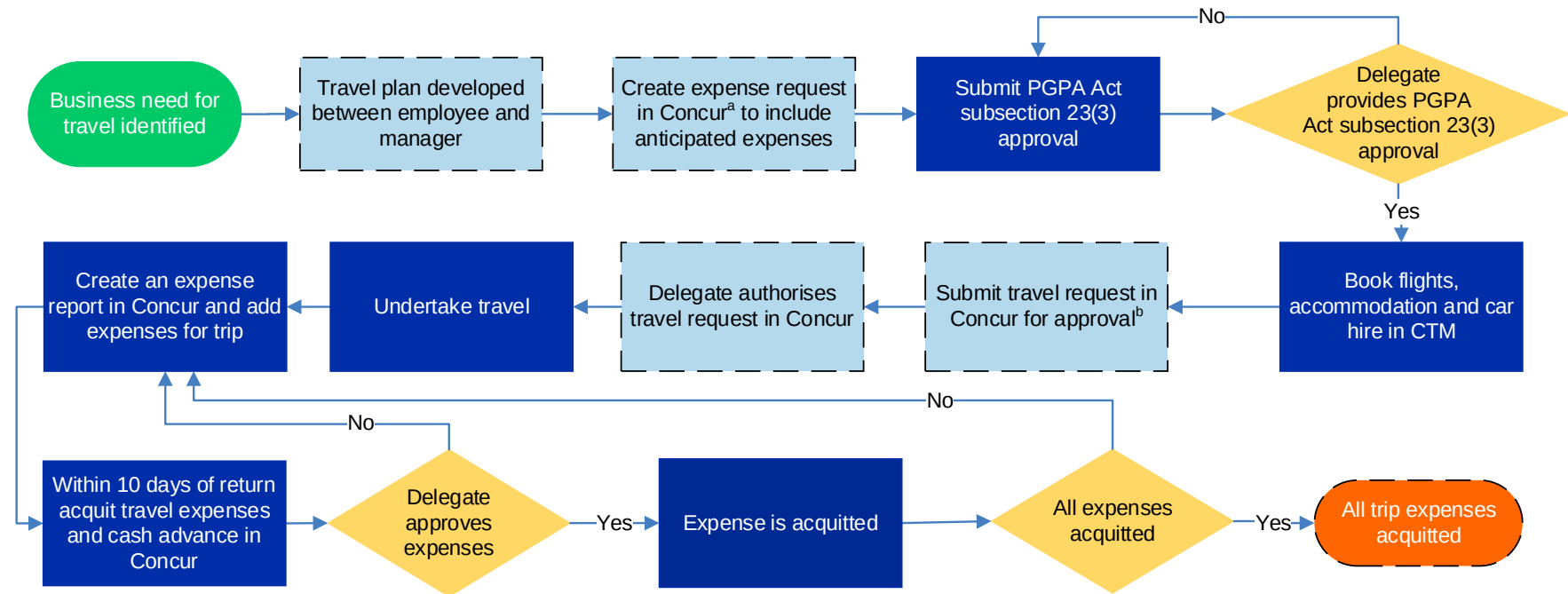
Departmental travel framework

2.21 DAFF's Travel Policy (March 2023) and Travel Regulation Manual (March 2025) set out the department's requirements with respect to official travel to achieve compliance with the WoAG Arrangements.

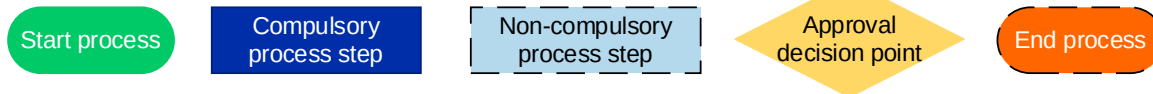
Domestic travel

2.22 DAFF's process for domestic travel is illustrated in Figure 2.1.

Figure 2.1: Domestic travel process in the Department of Agriculture, Fisheries and Forestry (December 2024)



Key



Note a: DAFF's system for creation of travel requests and acquittal of travel expenses is called Concur.

Note b: This step is compulsory if officials want to receive a meal and incidental allowance prior to travel.

Source: ANAO analysis of DAFF domestic travel policies.

2.23 The ANAO's assessment of the alignment of DAFF's Travel Policy and Travel Regulation Manual with the WoAG Arrangements for domestic travel is presented in Table 2.1. As of August 2025, DAFF was making changes to internal policies aimed at improving records of subsection 23(3) approvals (see paragraph 3.28).

Table 2.1: Alignment of DAFF's travel framework to whole of Australian Government arrangements for domestic travel

WoAG Arrangements	Assessment of DAFF's policies	
Select lowest practical fare — the lowest fare available, that suits the practical business needs.	◆	Officers are required to utilise the lowest practical fare under the Travel Policy and the Travel Regulation Manual.
Value for money — use of resources in an efficient, effective, economical and ethical manner that is consistent with Australian Government policies. ^a	◆	Expenditure must be in accordance with the PGPA Act, as set out in the Travel Policy and the Travel Regulation Manual.
Necessity of travel — air travel must only be undertaken where other communication tools are ineffective.	◆	The Travel Policy and the Travel Regulation Manual require decisions to consider the necessity of the travel. The Travel Policy provides a list of alternatives to travel, such as using videoconferencing facilities.
Diligence — officials must act in accordance with travel policies and with the Code of Conduct.	◆	The Travel Regulation Manual explicitly requires that officials act in accordance with the Code of Conduct while on official travel.
Use of contracted travel management services (TMS) supplier to book air travel and accommodation.	◆	DAFF requires the use of the TMS supplier to make domestic air travel and accommodation bookings unless they are unable to provide the service required.
Use of the contracted hire car provider for car rental.	◆	DAFF requires the use of the TMS supplier for car hire unless the TMS supplier is unable to provide the service required.
Domestic airfares must be economy class unless there is a reason or entitlement to travel business class.	◆	The Travel Regulation Manual permits SES officials to fly business class on domestic flights where the flight exceeds 4 hours.
Airline reward and loyalty points.	◆	The Travel Regulation Manual aligns with the WoAG Arrangements.
Personal travel — WoAG Arrangements must not be used for stand-alone personal or leisure travel.	◆	The Travel Regulation Manual aligns with the WoAG Arrangements.
Use of virtual card (lodge card) when booking in the TMS system.	◆	The Travel Regulation Manual mandates the use of a virtual card (lodge card) when booking.

Key: ◆ Fully aligned with the WoAG Arrangements ▲ Partly aligned ■ Not aligned.

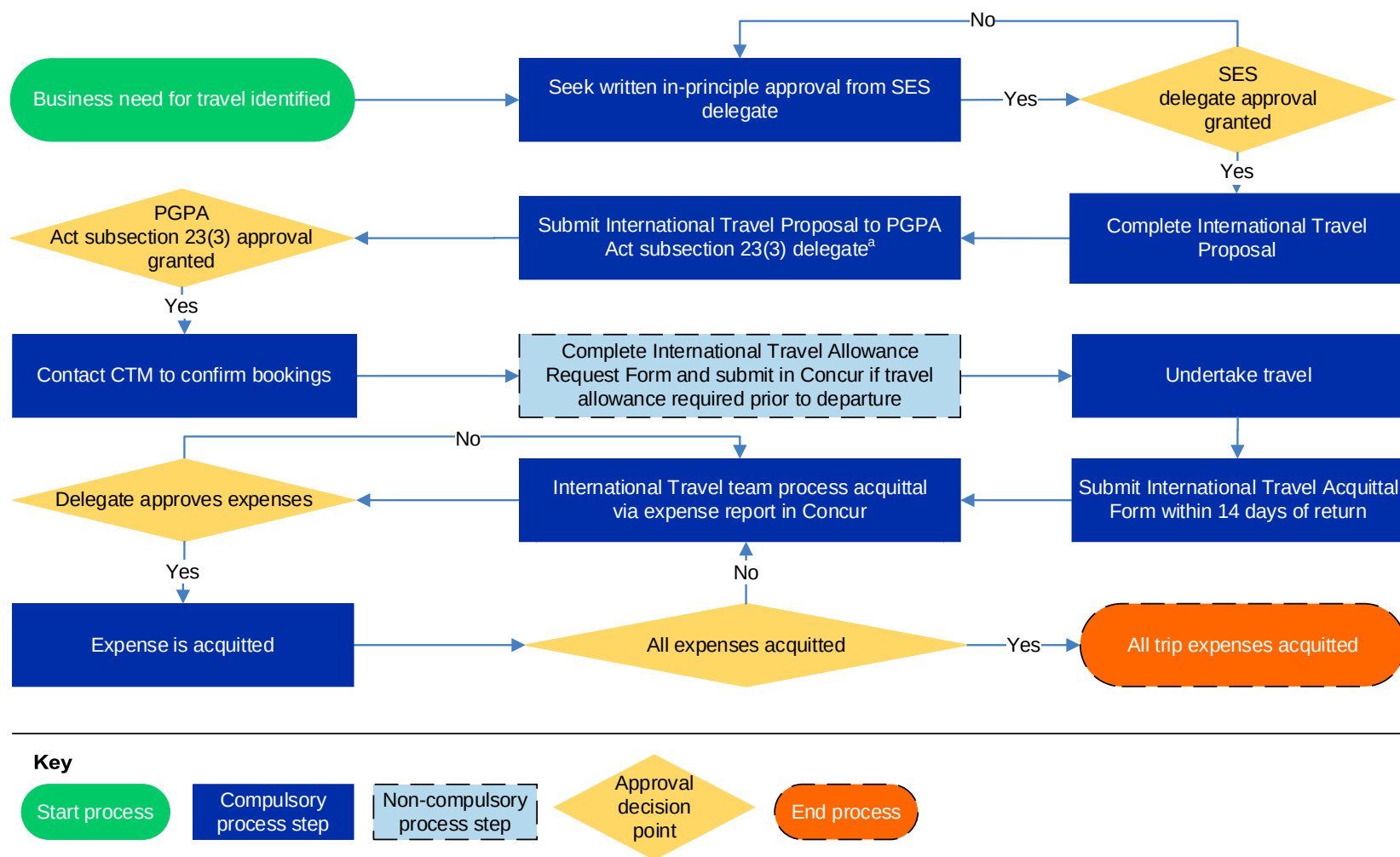
Note a: Officials must make decisions based on an impartial consideration of the fares available and not on a personal preference for a particular airline, aircraft, airline lounges or airline reward and loyalty program.

Source: ANAO analysis.

International travel

2.24 In addition to the Travel Policy and Travel Regulation Manual, DAFF has developed the International Travel Handbook (November 2024) to set out the process and advice for international travel. DAFF's process for international travel is depicted in Figure 2.2.

Figure 2.2: International travel process in the Department of Agriculture, Fisheries and Forestry



Note a: For travel which is up to and including \$49,999 and not politically sensitive, documents must be submitted no less than three weeks before travel. For travel which is \$50,000 or over and/or is politically sensitive, allow at least six to eight weeks for Ministerial consultation and approval.

Source: ANAO analysis of DAFF's international travel policies.

2.25 The ANAO's assessment of the alignment of DAFF's travel policies with the WoAG Arrangements for international travel is presented in Table 2.2.

Table 2.2: Alignment of DAFF's travel framework to whole of Australian Government arrangements for international travel

WoAG Arrangements	Assessment of DAFF's policies	
Value for money.	◆	The Travel Policy and the Travel Regulation Manual require expenditure to be in accordance with the PGPA Act.
Necessity of travel.	◆	The Travel Policy and the Travel Regulation Manual state that official travel decisions take into consideration the necessity of the travel.
Safety — under no circumstances are officials required to use airlines with a poor industry reputation for safety.	◆	The International Travel Handbook requires officials to complete risk and security assessments for each trip.
Approval of the need to travel — officials are to use the entity's internal controls for the approval requirements that apply to international travel.	◆	DAFF has appropriate delegation instruments in place. Approval is documented in an International Travel Proposal.
International Best Fare (IBF) — the lowest fare at the time of booking, that suits the practical business needs, to maximise value for money.	◆	DAFF's policy states that all bookings must be consistent with IBF. Three quotes must be obtained from at least two carriers where there are at least three potential carriers for a service.
Use of contracted TMS supplier to book international air travel departing Australia.	◆	DAFF requires the use of the TMS supplier to make international air travel bookings.
Class of travel — for international travel and travel within an international country, officials are required to select a business class or equivalent class, or lower class airfare.	◆	The Travel Regulation Manual requires all international travel to be booked as business or economy class. It notes that if airlines only offer only first or economy class, that first class should be considered to be business class.
Use of virtual card (lodge card) when booking in the TMS system.	◆	The Travel Regulation Manual mandates the use of a virtual card (lodge card) when booking via the TMS supplier.
Airline reward and loyalty points.	◆	The Travel Regulation Manual aligns with the WoAG Arrangements relating to airline reward and loyalty points.
Personal travel — WoAG Arrangements must not be used for stand-alone personal or leisure travel.	◆	The Travel Regulation Manual aligns with the WoAG Arrangements.

Key: ◆ Fully aligned with the WoAG Arrangements ▲ Partly aligned ■ Not aligned.

Source: ANAO analysis.

Departmental policy — Commonwealth corporate credit card

2.26 DAFF's Commonwealth Corporate Credit Card Policy (December 2024) sets out the 'compliance and regulatory framework for use and acquittal of expenditure on a Commonwealth Corporate Credit Card (credit card) and virtual credit card (lodge card)'. Credit cards are physical

cards issued to officials to make purchases of goods and services, while lodge cards are ‘virtual’ cards used for bookings made through the travel management system.²⁴

2.27 Credit cards issued to officials must not be used for the following purposes:

- personal expenses;
- services that can be arranged through the department's travel service provider (airline flights, domestic accommodation, domestic car rentals);
- any procurement that is covered by a WoAG arrangement such as ICT, stationary, office supplies, legal service etc;
- meals or incidental items for which travel allowance has been or should be paid;
- cash withdrawal (unless approved by the Chief Finance Officer);
- partial deliveries against contracts or purchase orders;
- traffic or parking infringements;
- tipping of any kind (e.g.: taxis, uber, waiters etc);
- purchases made using Administered funding; and
- purchasing software, web-based tools or online hosted service as a subscription, and/or software as a subscription.

2.28 Acquitting travel expenditure, including expenditure on the lodge card, is outlined in the DAFF Travel Regulation Manual. Domestic travel expenses must be acquitted within 10 days of return, and international travel within 14 days of return.²⁵ For domestic travel, receipts or invoices are mandatory for all charges over \$82.50²⁶ and for all international expenses regardless of value.²⁷ The International Travel Handbook states ‘All allowances and expenditure related to international travel are acquitted and submitted by the International Travel team’.²⁸

Continuous improvement — internal audit

2.29 DAFF undertook two internal audits relating to travel in 2024:

- ‘Travel support and efficiency of expenditure acquittal methodologies’ (October 2024); and

24 The requirement to use a virtual card (lodge card) for bookings made through the TMS supplier is a requirement of the WoAG Arrangements.

25 All other credit card transactions must be acquitted by the cardholder and approved by a delegate within 30 days of the transaction date. The policy requires all transactions to have a tax invoice attached to the acquittal.

26 The Commissioner of Taxation requires all businesses in Australia to provide a tax invoice to customers for any sale of \$82.50 or above. Australian Taxation Office, *Goods and Services Tax Ruling*, ATO, Canberra, 2019, available from <https://www.ato.gov.au/law/view/document?docid=GST/GSTR20131/NAT/ATO/00001> [accessed 7 October 2025].

27 The DAFF Travel Regulation Manual and the Commonwealth Corporate Credit Card Policy note ‘It is considered best practice to attach receipts under \$82.50’.

28 An international travel acquittal form is used to collate supporting documentation and endorsement of expenses for international travel. This must be provided to the International Travel Team within 14 days of return from travel.

- ‘International Travel’ (November 2024).

2.30 The ‘Travel support and efficiency of expenditure acquittal methodologies’ internal audit assessed the appropriateness of support and guidance for staff in acquitting travel expenditure, and whether the department’s two acquittal methodologies (domestic and international) were efficient. The overall conclusion was:

whilst the support and guidance provided to staff relating to travel arrangements is somewhat effective, there is a need to strengthen the control framework around travel bookings and monitoring and reporting activities, which will lead to efficiencies that can be made with a more streamlined approach to travel arrangements.

The travel acquittal processes are also considered to be largely efficient however if there is further consideration around streamlining of the acquittal processes to a single process for all staff, this decision should be risk based and data informed.

2.31 The ‘International Travel’ internal audit assessed compliance with the policy on international travel, and assessed whether DAFF’s International Travel Proposal Form was fit for purpose. The overall conclusion was:

the department’s travel framework as it relates to International Travel is compliant with legislation and Whole of Australian Government policy requirements. The recent introduction of the Lighthouse International Travel Proposal Form (ITP) was found to be largely functional noting that internal audit has made recommendations to improve both usability and efficiency of the form.

2.32 The internal audits included five recommendations each.

- The ‘Travel support and efficiency of expenditure acquittal methodologies’ report made:
 - two high risk recommendations relating to system integration for approvals;
 - one medium risk recommendation relating to establishing a framework for monitoring compliance; and
 - two low risk recommendations relating to training and continuous improvement through monitoring of systemic travel issues.
- The ‘International Travel’ report made:
 - two medium risk recommendations — one relating to compliance checking against departmental and WoAG Arrangements, the other in relation to the system functionality of the International Travel Proposal form; and
 - three low risk recommendations relating to: the control framework for contingencies; timeliness between travel approvals and booking impacting on costs for flights and accommodation; and formal review of the electronic International Travel Proposal form.

2.33 As at 14 August 2025, DAFF was implementing the recommendations. Implementation of the recommendations for ‘Travel support and efficiency of expenditure acquittal methodologies’ is expected to be completed by November 2025. Recommendations made in the International Travel internal audit are expected to be implemented by June 2026.

Has the Department of Agriculture, Fisheries and Forestry developed appropriate training and education arrangements to promote compliance with domestic and international travel requirements?

DAFF requires all officials to complete training on the duties and responsibilities of officials under the *Public Governance, Performance and Accountability Act 2013*, including on the appropriate use of public resources. As of 30 June 2025, the compliance rate for the completion of mandatory training was 87 per cent. DAFF introduced non-mandatory travel-specific training in December 2024. Guidance material is available to officials through different channels.

2.34 The Australian Public Service Commissioner's Directions 2022 mandates integrity training for all employees of the Australian Public Service, with entities to provide a range of additional mandatory training and education to officials.²⁹ The PGPA Act requires accountable authorities to establish and maintain measures to ensure officials comply with the finance law. Failure to comply with the finance law is a breach of the APS Code of Conduct.

2.35 While there is no requirement for entities to provide travel-specific training or education to officials, the WoAG Arrangements form part of the Commonwealth Procurement Rules which are part of the finance law. Providing training and education on the WoAG Arrangements supports officials to comply with finance law.

Mandatory training

2.36 DAFF has a mandatory training package with nine courses known as the Essentials Suite that includes training on: diversity and inclusion; emergency and lockdown; integrity; privacy; record keeping; safety; security; obligations as an APS employee; and finance. Departmental officials register for training via LearnHub, the department's internal learning and development system, with new starters automatically enrolled.

2.37 Officials engaged for three months or longer must complete the Essentials Suite within three months of commencing employment. Officials engaged for three months or less must complete the Essentials Suite within two weeks of commencing employment. This suite of courses must be completed every 12 months. Non-completion of mandatory learning by due dates is recorded as non-compliant. Supervisors will receive completion and overdue notifications for their staff.

2.38 Of the mandatory modules, three reference official travel in their content: Security Essentials; Integrity Essentials; and Finance Essentials.

- The Security Essentials module provides an overview of DAFF's protective security arrangements. There is a section on travel security threats. The training advice is

29 Department of Prime Minister and Cabinet, *Australian Public Service Commissioner's Directions 2022*, Part 3, p. 12, Section 19, available from <https://www.legislation.gov.au/F2022L00088/2025-04-01/2025-04-01/text/original/pdf> [accessed 1 July 2022].

consistent with the Travel Policy, Travel Regulation Manual and the International Travel Handbook.³⁰

- The Integrity Essentials course covers the APS Values and Code of Conduct. The course material is consistent with the requirements in the Travel Regulation Manual and highlights additional security risks when travelling internationally.
- The Finance Essentials course references travel including DAFF policies and WoAG Arrangements and highlights that in approving travel there must be a 'demonstrated business need for the travel'.

Monitoring of mandatory training completion

2.39 Reporting on completion of mandatory training has been provided to DAFF's Executive Board on a quarterly basis. The compliance rate was discussed quarterly between 1 July 2022 and 31 August 2025 by the Executive Board. Minutes from meetings reflected a focus on lifting the compliance rates, having SES lead by example, and staff messaging around awareness of education and training to ensure compliance with policy and legislation.

2.40 The compliance rates for DAFF as at 31 December 2022, 31 December 2023, 31 December 2024 and 30 June 2025 are shown in Table 2.3.

Table 2.3: Reporting on mandatory training compliance

Module	Compliance as at 31 December 2022 (%) ^a	Compliance as at 31 December 2023 (%) ^a	Compliance as at 31 December 2024 (%) ^a	Compliance as at 30 June 2025 (%) ^a
Security	78	88	88	90
Integrity	77	88	87	89
Finance	79	88	87	89
Overall Essentials Suite	73	82	83	87

Note a: The compliance rate includes APS staff and contractors. A person is compliant if they have completed the course within the required period. The overall compliance rate for the Essentials Suite is not an average, it is the percentage of people who have completed all nine Essentials Suite courses within the required period.

Source: DAFF reporting.

Travel-specific training

2.41 DAFF has three training modules directly related to travel: International Travel — Defensive Security Briefing³¹; Travelling with DAFF³²; and Concur — General User.³³ The International Travel — Defensive Security Briefing is mandatory for staff travelling internationally if it has not been

30 Requirements include: provision of a security briefing prior to international travel; advising of international travel requirements for staff with a security clearance; and access to personal safety or defensive travel briefings.

31 This course provides security awareness for international official travel with DAFF, including understanding security risks, application of the Code of Conduct while traveling and where to get assistance.

32 This course provides an outline of: the key travel principles; how to book and manage travel; and which resources are available to help.

33 DAFF's system for creation of travel requests and acquittal of travel expenses is called Concur. This course provides an overview of creating a travel request, and acquitting travel and credit card expenses.

undertaken in the 12-months prior to the submission of the International Travel Proposal. The other two modules are not mandatory and are completed at the discretion of officials.

2.42 The Travelling with DAFF training was introduced following the 'Travel support and efficiency of expenditure acquittal methodologies' internal audit which identified a need for strengthened communication through training programs. Eighteen officials attended the first course in December 2024 — feedback on the course was positive. Seven sessions have been held since December 2024 with 149 officials attending. Feedback on the course has generally been positive.

Guidance material

2.43 Communication to officials regarding policy requirements can occur through other mechanisms. DAFF provides news and messaging across the department via its intranet. There are intranet pages for domestic travel, international travel and Commonwealth credit cards which contain links to policy documents and additional guidance material. Material includes instructions describing how to undertake tasks in Concur, the CTM portal and Lighthouse³⁴ such as creating travel requests and acquitting travel expenses.

2.44 The Business Bulletin is posted to the intranet and emailed to staff every Friday, containing information on key projects, IT, finance and human resources activities, including travel when relevant. Business Bulletins contain a 'Training and events' section, which includes:

- reminders to complete mandatory training;
- notices of training opportunities;
- monthly updates of training through the APS Academy;
- notices on departmental events.

2.45 The intranet, Business Bulletin and messages from the Secretary have been used to update officials on procedural changes or provide reminders of requirements for travel.

2.46 Fifteen information sessions were held between August 2022 and November 2024 on using Concur. One hundred and sixty-two officials attended the training during this time.

2.47 DAFF advised the ANAO on 30 June 2025 that there is not a systematic approach to tracking and evaluating the guidance provided on the intranet, in the Business Bulletin or via email. Without a systematic approach, there is a risk of contradictory information being provided, or failing to identify whether messaging is having the desired effect.

34 Lighthouse is DAFF's financial management compliance system (FMCS) which hosts numerous forms to assist with finance, integrity, security, international travel and other corporate functions.

3. Controls and processes for managing domestic and international travel

Areas examined

This chapter examines whether the Department of Agriculture, Fisheries and Forestry (DAFF) has effectively implemented controls and processes for domestic and international travel in accordance with its policies and procedures.

Conclusion

DAFF's controls and processes for domestic and international travel are partly effective.

- Data indicates that DAFF booked flights in accordance with the whole of Australian Government travel arrangements (the WoAG Arrangements) related to 'Lowest Practical Fare' and 'International Best Fare'.
- For domestic travel, there were insufficient records to clearly demonstrate consideration of value for money and records were not stored to allow for efficient assurance of the acquittal of travel-related expenses.
- DAFF did not have an overarching approach to checking compliance with the WoAG Arrangements and internal requirements for travel, including in relation to whether officials are being influenced by preferences for particular airlines and airline lounge and reward and loyalty point arrangements.

Areas for improvement

The ANAO made two recommendations aimed at improving records of business need, approval and acquittal of expenditure in order to demonstrate value for money.

The ANAO suggested that DAFF could:

- reference its guidelines on gifts and benefits policy in its Travel Regulation Manual;
- establish an appropriate expense code for airline membership purchases and better document need and approval for these purchases;
- check that travel-related expenditure is in line with the PGPA subsection 23(3) approval and DAFF policies as part of compliance activities; and
- consider if the overarching travel approval and associated expenditure meets the definition of 'significant' non-compliance with finance law for reporting to the Minister and in the department's annual report.

3.1 Section 16 of the *Public Governance and Accountability Act 2013* (PGPA Act) requires accountable authorities of Commonwealth entities to establish and maintain appropriate systems of internal control. Entities should have an effective, evidence-based assurance framework in place to validate control effectiveness and monitor compliance with policy requirements for the purposes of continuous improvement.

3.2 DAFF's expenditure on domestic and international travel between 2022–23 and 2024–25 is presented in Table 3.1.

Table 3.1: Department of Agriculture, Fisheries and Forestry travel expenses

Year	Domestic travel ^a (\$)	International travel ^b (\$)	WoAG fees (\$)	Other ^c (\$)	Total (\$)
2022–23	18,873,393	5,387,827	477,658	1,930,054	26,668,932
2023–24	18,202,915	4,771,186	736,021	2,136,720	25,846,842
2024–25	19,223,781	6,002,790	2,055,680	2,242,917	29,525,169
Total	56,300,090	16,161,803	3,269,359	6,309,692	82,040,944

Note a: Domestic travel includes accommodation, airfares, other domestic travel expenses, incidentals and travel allowance.

Note b: Not included in these figures is expenditure on travel by DAFF officers based overseas. Expenditure of this nature was \$1.26 million across the three years. International travel includes accommodation, airfares, other international travel expenses, incidentals and travel allowance.

Note c: Other includes car hire, COVID-19 vaccines for travel and taxis.

Source: ANAO analysis.

Has the Department of Agriculture, Fisheries and Forestry effectively implemented controls for domestic travel?

For domestic travel, there was insufficient documentation of the need to travel and appropriate approvals in the sample tested. This limits DAFF's ability to demonstrate consideration of value for money. For domestic flights, 99 per cent were recorded as complying with the lowest practical fare policy — 44 per cent were the 'lowest fare' (cheapest). Of the travel reviewed by the ANAO:

- 58 per cent did not have a travel request created in the department's travel and credit card expense management system;
- 57 per cent were not approved in line with departmental policy;
- 96 per cent of bookings were made through the contracted supplier, as required;
- 43 per cent of accommodation expenses were above the subscription service rates without delegate approval; and
- 64 per cent of travel-related expenses were acquitted within 10 days, as required, and 36 per cent were not.

Records of domestic travel

3.3 DAFF's approach to record keeping for domestic travel does not: clearly demonstrate that it follows its policies and processes for domestic travel (as illustrated in Figure 2.1); inform decision-making; and clearly demonstrate value for money.³⁵

- DAFF does not require officials to create a 'domestic travel request' for each instance of travel in the department's expense management system for travel and credit card

35 The National Archives of Australia's *Information Management Standard for Australian Government* sets out a framework for well-managed business information, available from <https://www.naa.gov.au/information-management/standards/information-management-standard-australian-government> [accessed 4 August 2025].

purchases, Concur. Even if a request is created, all expenses related to the travel may not be linked to the relevant request. Travel-related expenses are recorded in the department's financial management system, TechnologyOne, as individual expense items rather than by instance of travel. The implications of not requiring the creation of a 'domestic travel request' are discussed throughout this section.

- The ANAO identified limitations with data from the travel management services (TMS) system which mean that the data could not be relied upon to identify the number of trips undertaken (trip population). There were limitations in identifying unique trips including: instances where a trip could have multiple records; staff with bookings made with slight differences in their name resulting in double counting; and incomplete or inaccurate employee identification numbers.

3.4 Due to these issues, the ANAO was not able to reliably identify all trips undertaken by DAFF officials between 1 July 2022 and 31 December 2024.

3.5 Within Concur, expenses related to travel are categorised to certain expense codes. Using these codes, the ANAO identified expenses listed in Concur that related to official travel. The ANAO selected a random sample of 72 expense reports³⁶ where travel-related expenses were acquitted between 1 July 2022 and 31 December 2024 out of a total of 54,513 expenses reports. From these expense reports, the ANAO assessed the effectiveness of DAFF's controls for domestic travel.

Planning and approval

3.6 DAFF policy requires officials planning to undertake travel to:

- identify a business need for travel, and develop a travel plan in conjunction with their managers; and
- then seek subsection 23(3) PGPA Act approval (subsection 23(3) approval).

3.7 The Travel Regulation Manual states that 'a travel plan will normally be developed between an employee and manager to address business and operational requirements with the most appropriate mode of transport and any work health and safety obligations'. For 42 (58 per cent) of 72 expense reports reviewed by the ANAO, the business need was not documented in travel plans and information held within Concur did not document any consideration of the most appropriate mode of transport or any work health and safety obligations. There was an appropriate record for 30 (42 per cent) of the expense reports.

3.8 DAFF policy states that delegates must provide subsection 23(3) approval before any travel is booked. DAFF's Travel Regulation Manual (April 2024) outlines that 'PGPA Act s23(3) approvals require the approving delegate to satisfy themselves that the official travel complies with Australian Government Travel Policies'.

3.9 Under subsection 23(3), a delegate is required to provide approval for travel prior to any expenses being incurred and the approval must be documented. This may be completed outside of Concur (for example in email) and can be attached to a domestic travel request in Concur. Of the 72 expense reports reviewed by the ANAO:

36 Expense reports are created by officials to group individual expenses under a single report. This enables delegates to approve expenses as a group rather than individually.

- 41 (57 per cent) did not have approval recorded in line with DAFF policy; and
- 31 (43 per cent) were approved appropriately.

3.10 On 3 July 2025, DAFF advised the ANAO that one SES Band 1 officer had provided overarching subsection 23(3) approval for all travel within their branch at the commencement of each financial year from at least 1 July 2022 until May 2025. DAFF was unable to locate the overarching approvals for 2022–23 and 2023–24. DAFF provided the overarching approval dated 5 July 2024 for 2024–25.

3.11 Providing an overarching approval for travel in this context does not meet Department of Finance guidance. This guidance indicates that overarching subsection 23(3) approvals should not be provided for travel where expenditure cannot be reasonably estimated. It notes that there are a range of factors that can influence the need and cost of individual travel proposals.³⁷ In addition, the overarching approval provided by DAFF did not document the subsection 23(3) approval in line with creation of an appropriate record because the approval did not quantify any monetary limits on the amount to be approved, including the upper limits of the approval.

3.12 This approval was relevant for 22 (31 per cent) of the 72 travel expense reports reviewed by the ANAO. On 20 August 2025, DAFF advised the ANAO that it was not able to provide information about the total number and value of trips undertaken between 1 July 2022 and 31 December 2024 that were covered by an overarching approval. DAFF noted that there were 'in excess of 10,000 travel requests' processed with expenses of approximately \$20 million in the SES Band 1 officer's branch between 1 July 2022 and 31 December 2024.

3.13 DAFF's records relating to domestic travel between 1 July 2022 to 31 December 2024 do not sufficiently demonstrate business need and consideration of value for money. Records in Concur do not provide assurance that officers have complied with subsection 23(3) relating to approval of expenditure.

37 Department of Finance, *Non-Corporate Commonwealth Entities — key information* (Resource Management Guide 400), 'When is an overarching approval to commit relevant money appropriate?', available from <https://www.finance.gov.au/government/managing-commonwealth-resources/commitment-relevant-money-rmg-400/non-corporate-commonwealth-entities-key-information-rmg-400> [accessed 8 July 2025].

Recommendation no. 1

3.14 The Department of Agriculture, Fisheries and Forestry document the business need and *Public Governance, Performance and Accountability Act 2013* subsection 23(3) approval in order to support value for money with respect to domestic travel. This should be appropriately stored in the department's records management system and expense management system.

Department of Agriculture, Fisheries and Forestry response: Agreed

3.15 *The department has taken a range of steps to further strengthen and document compliance with the PGPA Act including the upcoming rollout of the use of forms to capture the business need and demonstrate the value for money for travel.*

3.16 *The department acknowledges that the majority of travel approvals considered non-compliant by the ANAO were supported by an overarching s23(3) approval. This overarching approval process was supported by a centralised team who oversaw individual travel bookings and acquittals. The department considers this travel had a genuine business need as it supported the provision of critical cost recovered export services to industry. The department has since amended this approval process to ensure the travel expenditure is considered compliant with the PGPA Act.*

3.17 *The department is currently considering a systematised way of storing travel documentation in a single location. This will further strengthen the department's compliance policies and procedures for domestic travel, including the ability to better identify potential non-compliance.*

Booking

3.18 Once a delegate provides subsection 23(3) approval, bookings of domestic travel (flights, accommodation and car hire) must be completed through the TMS system (Figure 2.1).³⁸ Of the 72 expense reports reviewed by the ANAO, 55 required bookings through the TMS system. For these, 53 (96 per cent) were booked through the TMS system. Two expenses were for hotels that were booked outside of the TMS system.

Lowest practical fare

3.19 The WoAG Arrangements require officials to book flights at the lowest practical fare (LPF) (see paragraphs 1.7 and 1.8). If a flight is booked that is not the lowest fare in economy class, officials are required to select the 'booking code' from a drop-down list (within the TMS system) which includes six options (refer to Table 1.2).

3.20 Table 3.2 shows the policy codes selected for all of DAFF's domestic flights booked between 1 July 2022 and 31 December 2024.

38 Hire cars can be booked outside of the TMS system in circumstances where Hertz cannot supply a car. Email confirmation of the lack of available hire car must be obtained prior to booking with another company.

Table 3.2: Whole of Australian Government booking codes — 1 July 2022 to 31 December 2024^a

Booking code		Domestic (%) ^b
1	Lowest fare	44
6	Require flexibility to change booking	39
2	Timing, routing, connection or baggage charges	14
3	Approval or entitlement to travel at higher fare class	4
5	Personal responsibilities	1
7	Outside of LPF Policy	<1
4	Health issues	<1
–	Other ^c	<1

Note a: The data is based on LPF code per booking reference. The Department of Finance advised the ANAO that booking references are not unique.

Note b: Booking references may include multiple flights for the same instance of travel, each associated with a different LPF code. Where this occurs, the booking reference will be included under multiple booking codes meaning results will not add to 100 per cent. Bookings may also contain both domestic and international flights.

Note c: 'Other' refers to records where an LPF code has not been recorded in the TMS system.

Source: ANAO presentation of LPF data extracted from the contracted TMS supplier. The ANAO has not tested the data as part of this audit.

3.21 Booking codes are not required to be recorded in Concur and are not available at the time of seeking approval from a delegate. As such, delegates may not be fully informed when making a decision as to how the travel complies with the WoAG Arrangements.

Accommodation, meal allowances and incidentals

3.22 DAFF adopts the Commonwealth Allowance Subscription Service (subscription service) rates as a guide for 'reasonable costs' for accommodation.³⁹ Under DAFF's Travel Regulation Manual, delegates can provide approval for expenditure on accommodation at a higher rate. Approval must be written. Of the 72 expense reports reviewed by the ANAO, 37 included accommodation expenses. Sixteen (43 per cent) accommodation expenses were above the subscription service rates without delegate approval. Delegate approval should be a key control in confirming value for money where accommodation expenses are above the subscription service rates. On average, accommodation expenses were \$30 per night over the subscription service rates.

3.23 Meal and incidental allowances can be paid in advance or claimed during the acquittal of travel expenses. With the exception of SES officials, corporate credit cards were not to be used for meals and incidentals. Prior to March 2025, SES officials were to pay for meals and incidentals while on official travel using their corporate credit card rather than receiving a travel allowance. In response to the 'Travel support and efficiency of expenditure acquittal methodologies' internal audit, SES officials now receive a travel allowance. The rationale for this change was to increase the efficiency of processes and to reduce the risk of non-compliance. Thirty-two (44 per cent) of the

39 Australian Public Service Commission, *Commonwealth Allowance Subscription Service*, available from <https://www.apsc.gov.au/initiatives-and-programs/workplace-relations/commonwealth-allowance-subscription-service> [accessed 27 July 2025].

72 expense reports tested by the ANAO included meal and incidental allowances. All meal and incidental allowances were paid in accordance with subscription service rate, as required by DAFF policies.

Delegate authorises travel request

3.24 As outlined in paragraph 3.3, officials are able to create a 'domestic travel request' in Concur. This is not mandatory. DAFF's guidance outlines that a domestic travel request allows for 'airfare, accommodation, car hire and other anticipated expenses', travel allowances and travel advances to be captured. Officials are required to create a request if meal and incidental allowances are to be paid in advance of the travel. Once a travel request is created, it workflows to a delegate for approval.

3.25 For the ANAO's sample of 72 expense reports, domestic travel requests were not created for 42 (58 per cent). For the 30 (42 per cent) domestic travel requests that were created:

- 13 (43 per cent) were linked to an expense report, of these three (four per cent) were created after travel; and
- 17 (57 per cent) were not linked to the relevant expense report.

Acquittal and finalisation

3.26 Once an official has undertaken travel, they are required to acquit their travel expenditure within 10 days after returning. Of the 72 expense reports assessed by the ANAO, 46 (64 per cent) were acquitted within 10 days and 26 (36 per cent) were not. Unacquitted travel is reported to division heads and the Executive Board (see paragraph 3.95).

3.27 DAFF's acquittal process requires that delegates endorse expenses. For the sample of 72 expense reports, there were records of delegate endorsement. Only two (three per cent) of the subsection 23(3) approvals were attached to the travel related expense reports tested by the ANAO. This limits the ability of delegates to confirm if the expense they are endorsing aligns with the approval.

3.28 In December 2024, DAFF updated guidance for acquitting domestic travel expenses to include the requirement to attach the subsection 23(3) approval to the expense report. Since March 2025, DAFF also requires officers to attach subsection 23(3) approvals to the travel requests in Concur.

Has the Department of Agriculture, Fisheries and Forestry effectively implemented controls for international travel?

DAFF has implemented largely effective controls for international travel.

- Business reasons, risk assessment and approval for international travel are routinely documented in the International Travel Proposal form.
- Data indicates that international flights were booked in accordance with the International Best Fare requirement of the WoAG Arrangements, with 85 per cent of flights being booked as the 'lowest fare' (cheapest).

- When approving the acquittal of international travel expenditure, the delegate does not have visibility of the total approved cost of the travel impacting their ability to provide informed approval.
- Thirty-three per cent of travel related expense reports were not acquitted within 14 days, as required.

Planning and approval

3.29 When planning to undertake international travel, DAFF requires officials to create an International Travel Proposal (ITP). Since 1 July 2023, the ITP is required to be submitted through Lighthouse.⁴⁰ The March 2025 version of the ITP captures the following information:

- details on the traveller(s), travel dates and countries to be visited;
- risk to the department if the travel is not undertaken and if the travel is essential;
- the estimated cost of the trip and where the funds are sourced from — for example, if expenditure is to be cost recovered;
- purpose of the travel, reason for trip and expected return on investment;
- risks and sensitivities;
- class of airfare; or any bookings are outside of the WoAG Arrangements⁴¹;
- a travel plan⁴², an International Travel Risk Advice Awareness form and a WHS risk assessment if conducting ‘hazardous work or operational activities’;
- evidence of completion of travel training⁴³ and assessment of hazards associated with the travel;
- whether there is a personal travel component;
- clearances through the International Travel Team, and First Assistant Secretary; and
- subsection 23(3) approval or PGPA Act section 71 approval if being approved by the Minister.

3.30 DAFF’s international travel framework requires a business need for the travel to be identified. The business need for travel is captured in the following sections of the ITP: ‘Business

40 Lighthouse is DAFF’s financial management compliance system (FMCS) which hosts numerous forms to assist with finance, integrity, security, international travel and other corporate functions.

41 Bookings outside WoAG Arrangements can include charter flights, boats, helicopters or buses.

42 A travel plan is a plan developed between an employee and manager to address business and operational requirements with the most appropriate mode of transport, and any work health and safety obligations.

43 Officials conducting international travel must complete the department’s International Travel — Defensive Security Briefing within 12 months preceding the ITP submission.

Purpose'⁴⁴, 'Major Reason for Trip'⁴⁵, 'Key Points — outcomes and expected return on investment'⁴⁶ and records 'Issues/Risks/Sensitivities'.

3.31 The ANAO selected a random sample of 38 expense reports that included international travel between 1 July 2023 and 31 December 2024 from a population of 1872. Of the 38 expense reports:

- 33 (77 per cent) were linked to an ITP — these ITPs documented business reasons for the travel; and
- five were for the purchase of travel related items, such as passports and visas, where an ITP would not be required — these were excluded from the following analysis.

3.32 As with domestic travel (see paragraph 3.9), all international travel must be approved by an appropriate delegate. DAFF has two levels of approval for international travel:

- 'in-principle' approval — all international travel must be initially endorsed by the traveller's manager and relevant First Assistant Secretary using the ITP form; and
- subsection 23(3) approval — this approval must be obtained prior to the commitment of any travel expenditure.

3.33 A travel plan was documented for 30 (94 per cent) of 33 expense reports to support the in-principle approval provided through the ITPs.

3.34 The Travel Regulation Manual requires that politically sensitive travel, regardless of value is approved by the Secretary and / or the Minister. Approval requirements are at Table 3.3.⁴⁷

Table 3.3: International travel PGPA Act approval delegations

Value of travel	Approving officer
Travel under \$50,000	First Assistant Secretary for Trade and International Division or First Assistant Secretary for Biosecurity Operations Division (biosecurity operations activities only) or Deputy Secretaries
Travel over \$50,000	Secretary or Minister

Source: DAFF Public Governance, Performance and Accountability (Accountable Authority) Delegations and Sub-delegations 2024.

44 Officials must record the business purpose for their official travel, and outline their consideration of the travel principles in the department's travel policy.

45 The options are: Biosecurity — Compliance, audit and monitoring; Biosecurity — Capacity development and/or training; Biosecurity — Operations; Trade — Multilateral meeting/s — international standards setting and/or international negotiations; Trade — Bilateral meetings; Trade — FTA negotiations and maintenance; Policy — Multilateral meeting/s; Policy — Bilateral meeting/s; Learning and Development; and Other.

46 This includes the alignment of the travel to the department's priorities, outcomes expected, the requirement for Australian based officials to travel, and the rationale for the number of delegates travelling.

47 The Travel Regulation Manual requires that any travel that is politically sensitive, or over \$50,000 also be approved by the Minister. The ITP notes that for expenditure greater than \$50,000 that the expenditure approval requirements for the Minister are given under subsection 71 of the PGPA Act. Finance, *Public Governance, Performance and Accountability Act 2013*, subsection 71, Approval of proposed expenditure by a Minister.

3.35 Subsection 23(3), or section 71, approval was provided in accordance with delegations for all travel-related expense reports.

3.36 Officials undertaking international travel are not required to create travel requests in Concur unless a travel allowance is required prior to travel.⁴⁸ For the 33 expense reports, there were travel requests in Concur for 12 (36 per cent) and not for 21 (64 per cent).

Booking

3.37 International travel bookings, including flights and accommodation, are completed by the official undertaking international travel. Once subsection 23(3), or section 71, approval has been granted through the ITP, the official is responsible for confirming the bookings where bookings have been put on hold after seeking a quotation.

International Best Fare

3.38 As outlined in paragraph 2.25, DAFF requires that all bookings are consistent with the International Best Fare (IBF) requirement of the WoAG Arrangements. Officials are required to select a 'booking code' when booking their flights in the TMS system to demonstrate compliance with the IBF requirement. Table 3.4 lists the booking codes selected for DAFF's international flights booked between 1 July 2022 and 31 December 2024.

Table 3.4: Whole of Australian Government booking codes — 1 July 2022 to 31 December 2024^a

Booking code		International (%) ^b
1	Lowest fare	85
2	Timing, routing, connection or baggage charges	8
6	Require flexibility to change booking	5
3	Approval or entitlement to travel at higher fare class	2
–	Other ^c	<1
5	Personal responsibilities	<1
7	Outside of LPF Policy	<1
4	Health issues	0

Note a: The data is based on LPF code per booking reference. The Department of Finance advised the ANAO that booking references are not unique.

Note b: Booking references may include multiple flights for the same instance of travel, each associated with a different LPF code. Where this occurs, the booking reference will be included under multiple booking codes meaning results will not add to 100 per cent. Bookings may also contain both domestic and international flights.

Note c: 'Other' refers to records where an IBF code has not been recorded in the TMS system.

Source: ANAO presentation of IBF data extracted from the contracted TMS supplier. The ANAO has not tested the data as part of this audit.

3.39 Of the 38 expense reports in the ANAO's sample, 22 included flights booked by DAFF. Twenty (91 per cent) of the sampled flights were booked at the lowest fare. For four flights

48 For international trips where travel allowance is not paid as a cash advance, a Concur request is not mandatory.

(12 per cent), the policy code was not included in the ITP. This means that the delegate may not have had visibility over whether the lowest fare was selected.

Meals and incidentals

3.40 A travel allowance is provided to cover meals and incidentals while conducting official travel. Meal and incidental allowances are calculated using the Employment Conditions Abroad International rates published by the Department of Foreign Affairs and Trade. Travel allowance estimates are calculated by DAFF's international travel team and recorded in the ITP for approval.

3.41 Officials either receive a travel allowance payment prior to international travel or after travel through the acquittal process. As outlined in paragraph 3.23, SES officials used their corporate credit cards to pay for meals and incidentals until March 2025 when the process changed.

3.42 For 16 (48 per cent) of the 33 expense reports, there was a travel allowance component. Fifteen of these (94 per cent) aligned with the Employment Conditions Abroad International rates and one (six per cent) did not.

Acquittal and finalisation

3.43 International travel-related expenses should be acquitted in Concur.

- Travellers are required to send a completed acquittal form, itinerary and supporting receipts to the international travel team.⁴⁹
- The international travel team creates an expense report with acquitted expenses and provides this to the delegate for approval.
- The delegate is to approve the acquitted expenses and then the international travel team approves the expenses in Concur on behalf of the delegate.

3.44 There were limitations with DAFF's acquittal processes for international travel.

- Travel expenditure is acquitted by expense, not by trip. Travel expenses for a single trip may be spread over several expense reports, and expense reports which include travel expenses may also include expenses unrelated to the relevant trip.
- The acquittal form and the expenses report are not linked to the ITP or a travel request in Concur, and do not reference the approved total expenditure. This reduces the ability of the international travel team and delegate to determine if the total cost of a trip was in line with the approved amount.⁵⁰ Twelve (36 per cent) of 33 expense reports in the ANAO's sample had a travel request in Concur. Of these 12, six (50 per cent) were linked to an expense report, and one (eight per cent) was linked to an ITP.

3.45 Because travel expenses are not routinely associated with a travel request or an ITP, and may be spread across a number of expense reports, the ANAO was unable determine whether all expenses incurred for a trip have been acquitted.

49 On 9 July 2025 the department advised the ANAO that some business areas acquit their own travel expenditure, and the international travel team checks these acquittals in Concur.

50 The delegate may be a different officer to the officer who provided the original section 23(3) approval for the travel.

3.46 DAFF policy requires the acquittal of expenditure associated with international travel to be completed within 14 days of return. Twenty-two (67 per cent) of the 33 expense reports were acquitted within 14 days and 11 (33 per cent) were not. Unacquitted travel is reported to division heads and the Executive Board (see paragraph 3.95).

Recommendation no. 2

3.47 The Department of Agriculture, Fisheries and Forestry ensures that international travel approvals are appropriately documented and retained in the department's records management system and the expense management system to support the travel acquittal process and identification of any non-compliance.

Department of Agriculture, Fisheries and Forestry response: Agreed

3.48 *The department is considering a systematised way of storing international travel proposals in a single location. This will further strengthen the department's compliance policies and procedures for international travel, including the ability to better identify potential non-compliance.*

Has the Department of Agriculture, Fisheries and Forestry implemented effective processes to support compliance with airline lounge and reward and loyalty point arrangements?

DAFF does not collect information on officials' membership of airline loyalty programs and its conflict-of-interest policy does not provide guidance in relation to memberships of loyalty programs or lounges. DAFF is unable to assess whether officials are being influenced by preferences for particular airlines, and airline lounge and reward and loyalty point arrangements when planning and undertaking official travel. DAFF requires officers to declare gifted airline lounge memberships and upgrades as a result of status credits accrued for official travel. The average time for reporting gifts and benefits accepted by DAFF officials from Qantas and Virgin Australia was 90 days — between 1 July 2022 and 31 December 2024. DAFF officials declared 15 gifts and benefits from Qantas or Virgin Australia. Eight of these were invitation-only lounge memberships. The department purchases lounge memberships for officials who undertake 'significant' travel — approval, including the value for money considerations, was not evident for 78 per cent of purchases reviewed by the ANAO. No lounge memberships were reported by DAFF's SES officials in their declarations of material interests.

3.49 The WoAG Arrangements prohibit the accrual of frequent flyer points by travellers for official travel. The accrual of status credits is permitted.⁵¹ The WoAG Arrangements require that value for money considerations do not include preferences for a particular airline or aircraft types, access to airline lounges or the accumulation of airline reward and loyalty points (including status credits).

51 Department of Finance, *FAQs — Airlines and Travel Management Services*, Finance, Canberra, 2025, Q13, available from <https://www.finance.gov.au/government/travel-arrangements/faqs-airlines-and-travel-management-services> [accessed 29 October 2025].

3.50 Section 27 of the PGPA Act states that an official must not improperly use their position to gain, or seek to gain, a benefit to themselves or another person, or to cause, or seek to cause, detriment to the entity, the Commonwealth, or any other person. Complying with the requirements related to gifts, benefits and hospitality supports entities to manage actual or perceived conflicts of interest.⁵²

3.51 Risks resulting from the receipt of gifts and benefits, including lounge memberships and status points, should be considered with regard to the intent of the WoAG Arrangements when booking flights with airline providers.

Airline loyalty programs

3.52 Membership of airline loyalty programs is at the discretion of an individual, and officials who join a loyalty program do so in a personal capacity. DAFF's conflict of interest policy does not provide guidance in relation to memberships of loyalty programs or lounges or status credits.

Traveller profiles

3.53 Membership of loyalty programs can be recorded as part of an official's traveller profile in the TMS system. The Department of Finance encourages officers to do this. The ANAO reviewed the profiles of the 128 officials in the domestic and international travel sample tested. Within this group, 84 (66 per cent) had not recorded an airline loyalty program, and 44 (34 per cent) had recorded at least one airline loyalty program.

Reward points

3.54 The TMS supplier and the airlines are responsible for blocking the accrual of reward points to members of airline loyalty programs. During the audit period, there was one instance identified of the TMS supplier not blocking reward points. DAFF, along with other entities using the WoAG Arrangements, received advice from the Department of Finance on this issue. The advice stated that the error was rectified, with the reversal of inappropriately allocated frequent flyer points. DAFF advised officials via its intranet of the error and that it had been rectified.

Status credits

3.55 Under the WoAG Arrangements, officials are allowed to accrue status credits. As status credits are allocated to an individual's loyalty program membership, DAFF advised the ANAO on 20 March 2025 that it has no visibility of the accrual of status credits as these are accrued on personal accounts.

Gifts and benefits

3.56 DAFF's 2021 guideline on gifts and benefits required that gifts and benefits that were offered or accepted over \$50 must be recorded on DAFF's internal gift register. For all gifts or benefits, officials must notify their manager. Where a gift is refused or deemed inappropriate to accept, a record must be made in the gift register. The updated gifts and benefits policy was published in June 2025 and requires that all offered gifts and benefits valued at more than \$100 (excluding GST) must be approved using the gifts and benefits form in DAFF's reporting portal.

52 Australian Public Service Commission, *APS Values and Code of Conduct in practice*, Section 5: Conflict of Interest, APSC, Canberra, 2025, available from <https://www.apsc.gov.au/publication/aps-values-and-code-conduct-practice/section-5-conflict-interest> [accessed 11 September 2025].

This includes gifts and benefits accepted or refused. All staff must declare situations where the acceptance of a gift or benefit could be perceived as influencing their official duties, even in instances where the gift or benefit falls below the reporting threshold of \$100.

3.57 DAFF identifies the following gifts and benefits that relate to travel in its 2025 gifts and benefits policy:

- sponsored or discounted travel and accommodation;
- benefits under loyalty schemes, such as frequent flyer points;
- airline Lounge access and other benefits under loyalty schemes; and
- vehicles, fuel, car hire or related discounts.

3.58 Between 1 July 2022 and 17 March 2025, one DAFF official declared receiving lounge memberships and other benefits through their Qantas and Virgin Australia loyalty programs as a result of accrued status credits. In making the declaration, the official noted that the status credits had been accrued through business travel. Two DAFF officials declared gifts and benefits of flight upgrades from Qantas.

Opportunity for improvement

3.59 DAFF could update its Travel Regulation Manual to reference to its guidelines on gifts and benefits to help ensure that flight upgrades, lounge memberships and other travel-related gifts are captured in the gifts and benefits register.

Airline lounges

3.60 Under the WoAG Arrangements, officials are required to not make decisions about air travel based on membership or access to airline lounges (or loyalty programs). DAFF's Travel Regulation Manual states:

When booking travel, officials must make decisions based on an impartial consideration of the fares available and not on personal preference for a particular airline or aircraft type, access to lounges or accumulating reward or status credits.

3.61 DAFF does not have processes in place to assess whether officials are making impartial decisions in this regard.

Lounge membership expenses

3.62 DAFF's Travel Regulation Manual enables a delegate to approve the purchase of an airline lounge membership for 'significant' travellers and the purchase must be approved by an SES officer.⁵³ There has been no definition or threshold for 'significant'. DAFF does not collect or maintain information on officials' membership or access to airline lounges. On 14 August 2025, DAFF advised the ANAO that the Travel Policy was being updated to provide a definition of 'significant' travel as a 'minimum of 10 return trips per year'.

53 For non-regular travellers, the delegate may provide PGPA Act subsection 23(3) approval for access to a lounge for a particular flight. The costs are to be considered in the assessment of the Lowest Practical Fare.

3.63 The ANAO identified that DAFF purchased at least 88 airline lounge memberships for its officers between 1 July 2022 and 31 December 2024. Expenditure was categorised using the following eight categories: membership fees; domestic accommodation; domestic airfares; other domestic travel expenses; domestic travel — incidentals; other admin; aerial services; and field operations costs. Fifty-two (59 per cent) lounge memberships were cost recovered via the Biosecurity, Imported Food and Export Certification Special Account 2020.⁵⁴

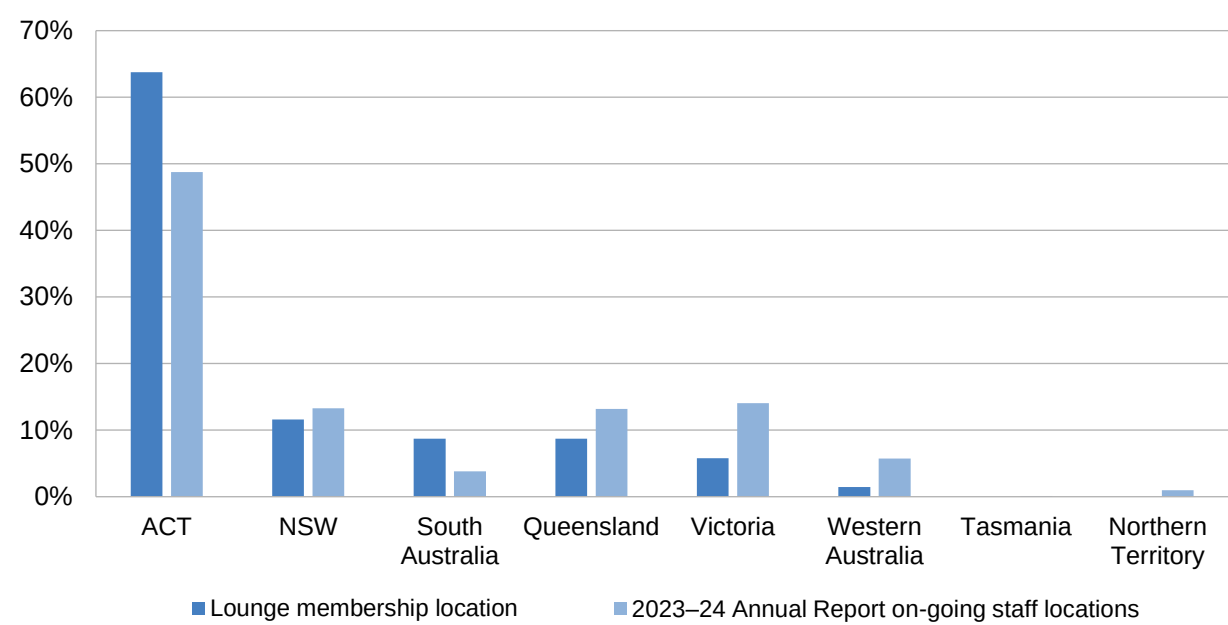
Opportunity for improvement

3.64 DAFF could establish an appropriate expense code for airline lounge membership purchases and consider the potential risk to value for money when considering eligibility and documenting approval.

- 3.65 For the 88 lounge memberships reviewed by the ANAO:
- 69 (78 per cent) did not have appropriate subsection 23(3) approval; and
 - 19 (22 per cent) had approval recorded — however, eight of these were for two years with no documented consideration of the continued need for travel or value for money.

3.66 For the 88 lounge memberships, there were differences between airline lounge memberships by location when compared to the staffing profile and locations (see Figure 3.1).

Figure 3.1: Spread of lounge memberships compared to location



Source: ANAO analysis.

54 This account is for the ‘purposes of providing biosecurity, inspection and certification services for: passengers, cargo, mail, animals, plants, and animal or plant products arriving in Australia; and agricultural products and food exported from Australia’.

3.67 On 20 August 2025, DAFF advised the ANAO that it had identified 131 staff with lounge memberships between August 2024 and August 2025 and, of these, 51 (39 per cent) were located in Canberra. DAFF noted that:

22 of 26 (85%) SES staff with memberships are located in Canberra and 18 of the 56 (32%) EL staff with memberships are located in Canberra. The executive staff are more likely to be in Canberra and travel more often.

Invitation-only lounges

3.68 Since October 2023, APSC's 'Guidance for Agency heads — Gifts and Benefits' requires that agency heads declare gifted airline lounge memberships on an entity's gifts and benefits register annually or when circumstances change.

3.69 Qantas and Virgin Australia gift Chairmans Lounge and Beyond Lounge memberships to senior APS officials. DAFF first publicly reported gifted Chairmans Lounge memberships on 28 October 2023.

3.70 In May 2024, DAFF recorded the Secretary's gifted Virgin Australia Beyond membership in the department's gifts and benefits register. This was not publicly reported until 14 February 2025. DAFF did not comply with the APSC requirement for reporting of the Virgin Australia Beyond Lounge membership as it should have been reported in May 2024 when the membership was gifted.

Timeliness of declarations of gifts and benefits

3.71 Until June 2025, DAFF's gifts and benefits guideline required all gifts and benefits to be declared and approved (required for gifts valued over \$50) 'as soon as reasonably practicable'. Between 1 July 2022 and 31 December 2024, DAFF officials declared 544 gifts and benefits. Fifteen (three per cent) of these were from Qantas or Virgin Australia. Eight (one per cent) were for invitation-only lounges.

- The average number of days between the receipt of all gifts and benefits from Qantas and Virgin Australia and the declaration was 90 days.
- The average number of days between the receipt of Chairmans Lounge or Virgin Australia Beyond memberships and declaration was 129 days.

3.72 On 17 June 2025, DAFF updated its gifts and benefits policy and now requires that gifts and benefits, either accepted or rejected, over \$100, or regardless of value where there is a perceived conflict, are declared within 14 days.

Declarations of interests

3.73 The Department of Finance provides guidance on general duties of officials, including the duty to disclose material personal interests in accordance with the PGPA Act.⁵⁵ Between 1 July 2022 and 13 October 2024, none of the SES officials declared the gift of an invitation-only airline lounge membership in their declarations of material interests.

55 Department of Finance, *General duties of officials* (Resource Management Guide 203), Duty to disclose interests, Finance, Canberra, 2023, available from <https://www.finance.gov.au/government/managing-commonwealth-resources/general-duties-officials-rmg-203> [accessed 9 May 2025].

3.74 The APSC’s guidance on annual declarations for SES officers does not provide guidance on the declaring of airline lounge memberships. There is a requirement on agency heads that: ‘Material personal interests should be considered in the context of your agency’s conflict of interest policy and any relevant enterprise risk assessment’.⁵⁶

Does the Department of Agriculture, Fisheries and Forestry have fit-for-purpose arrangements for identifying and responding to non-compliance?

DAFF has some processes in place to identify and respond to non-compliance, but it lacks an overarching approach to assessing compliance with both the requirements and the objectives of the WoAG Arrangements. DAFF has reported that it has implemented an internal audit recommendation to monitor areas of non-compliance relating to: domestic business class travel; attachment of the PGPA subsection 23(3) approval to travel expenditure approvals; and accommodation booked outside of the WoAG Arrangements. Travel-related non-compliance mostly involves the misuse of credit cards.

3.75 Having an appropriate process for the management of non-compliance is important in ensuring adherence to both internal policies and legislative requirements, and serves as a deterrent for future non-compliance. Responding to identified instances of non-compliance can facilitate continuous improvement of the entity’s control framework.

Identifying non-compliance

3.76 DAFF requires officials to report instances of non-compliance when they are identified. Non-compliance may also be identified through the acquittal process. Non-compliance can be reported by an officer, their supervisor, or a centralised team member through the Lighthouse system.

3.77 In Lighthouse, the ANAO identified 228 instances of travel related non-compliance reported between 1 July 2022 and 31 December 2024, valued at \$173,221. Twelve (five per cent) of these non-compliance instances were by SES-level officers. Table 3.5 shows a breakdown of travel-related non-compliance reported by category.

Table 3.5: Travel-related non-compliance reported through the department’s financial compliance management system, 1 July 2022 to 31 December 2024

Non-compliance category	Number	Value (\$)
Commonwealth corporate credit card	158 (69%)	25,088
Official travel	33 (14%)	19,640
Commitment of relevant money	17 (7%)	55,345
Commonwealth Procurement Rules — division 1: value for money	13 (6%)	6,730

56 Australian Public Service Commission, *Model Conflict of Interest Declaration form — Agency Heads and Statutory Office Holders*, APSC, Canberra, 2025, p. 4, available from https://www.apsc.gov.au/sites/default/files/2025-09/Model_AgencyHead_SOH_Declaration_Form.pdf [accessed 12 September 2025].

Non-compliance category	Number	Value (\$)
Duties of accountable authorities	4 (2%)	26,502
Commonwealth Procurement Rules — division 1: accountability and transparency	2 (1%)	38,239
Entering, varying and administering arrangements	1 (<1%)	1,676
Total	228	\$173,221

Source: ANAO analysis of DAFF data.

3.78 In addition to reporting through Lighthouse, an annual compliance survey is completed by all EL2s, SES Band 1s and SES Band 2s every July to identify non-compliance. Results of the annual survey are provided to the department's Audit and Risk Committee and Executive Board. There were 11 instances of non-compliance reported specifically on travel between 2022–23 and 2023–24 in the annual compliance survey.⁵⁷

3.79 The ANAO reviewed DAFF reporting on travel-related non-compliance. Non-compliance related to:

- booking accommodation, hire cars or flights outside the WoAG Arrangements;
- personal expenses charged as part of accommodation or hire car charges;
- use of credit card (physical card) rather than virtual card for booking travel;
- duplicate payments for accommodation;
- flight booking above class for traveller;
- flight upgrade at point of boarding given by supplier; and
- accommodation booked above the accommodation rates.

3.80 DAFF guidance states that non-compliance should be reported 'as soon as possible'. The average time for reporting non-compliance was 47 days from the date of non-compliance, with an average value of \$760.

Responding to non-compliance

3.81 When making a notification of potential non-compliance, the official is required to include the date of the breach, name of official, division, branch, details of breach, dollar value associated with the breach and expenditure type. The notifier identifies the category of non-compliance (for example 'commitment of relevant money'); and the type of non-compliance (for example 'approval not obtained' or 'approved by delegate outside of delegation threshold').

3.82 DAFF advised the ANAO on 27 February 2025 that the Financial Frameworks and Compliance team reviews all non-compliance submissions before they are finalised to determine whether an 'actual' breach has occurred, and the category of the breach. All fields in the non-compliance form can be amended by staff in the Financial Frameworks and Compliance team with system administrator access.

⁵⁷ Non-compliance reported under other categories, such as 'Commonwealth Corporate Credit Card', may include non-compliance that occurred as part of official travel.

3.83 The official who is reporting potential non-compliance is also required to document corrective action(s) and, if the non-compliance is due to private and unauthorised expenditure being placed on a corporate credit card, repay the debt 'within 28 days'. DAFF's corporate credit card policy states that the following sanctions may be imposed in response to credit card misuse:

- Suspend or cancel card
- Reduce transaction limits
- Refer the incident to the Financial Management Compliance Team or the Financial Framework Team to report to the CFO and the department Audit Committee; and/or
- notify the cardholder's SES manager.

3.84 There is evidence of escalation to the Financial Frameworks and Compliance team in circumstances where officials are responsible for multiple instances of non-compliance.

3.85 The ANAO identified examples of follow up activities having been undertaken in relation to non-compliance trends such as inadvertently using the corporate credit card for personal expenditure. Activities include: providing advice to senior leadership on non-compliance; internal communication on non-compliance trends; updating relevant intranet pages; and requesting additional training for officials.

Internal audit

3.86 As outlined at paragraphs 2.29 to 2.33, DAFF completed an internal audit on its travel support and acquittal assurance processes in November 2024. In relation to compliance activities, the internal audit found that 'regular compliance activities relating to travel arrangements, are not currently undertaken'. It highlighted that the absence of a formal process to monitor compliance creates a risk of a 'lack of a preventative control to ensure compliance with internal policies and legislative requirements' and of '[u]ndetected and unreported non-compliances'. The internal audit recommended:

The department establishes a formal process for assessing, monitoring and reporting compliance activities in relation to official travel, including the outcomes of compliance activities. This process should incorporate a detailed assessment of data sources from systems like Lighthouse and Concur and clarify roles and responsibilities for compliance monitoring.

3.87 DAFF agreed to this recommendation, which was implemented and approved for closure on 2 September 2025. In implementing this recommendation, there was a focus on compliance with respect to: domestic business class travel; attachment of the PGPA subsection 23(3) approval to travel expenditure approvals; and accommodation booked outside of the WoAG Arrangements.

3.88 Through its compliance checking, DAFF does not seek to confirm that the total expenditure incurred during travel is in line with the approved amount and was in accordance with DAFF policies (see paragraph 3.79 for examples of non-compliance).

Opportunity for improvement

3.89 DAFF could strengthen its compliance activities by assessing whether travel-related expenditure is in line with the PGPA subsection 23(3) approval and DAFF travel policies.

Has the Department of Agriculture, Fisheries and Forestry developed appropriate arrangements for reporting to executive management and externally on domestic and international travel?

Reporting is provided to executive management on international travel. Reporting of non-compliance with subsection 23(3) of the PGPA Act is provided to governance committees, the Chief Finance Officer and division heads, and includes disaggregation for official travel. The department responded to 31 travel-related Questions on Notice between July 2022 and February 2025. Twenty-one (70 per cent) of 31 the responses were on time. There were mapping differences in the department's reporting on travel expenditure in its annual report for 2022–23 and 2023–24 which meant car hire and WoAG travel provider fees were not included in the overall travel costs. DAFF advised that it has reported a range of issues to the Department of Finance relating to the WoAG Arrangements.

3.90 Entities should have appropriate arrangements for reporting to the accountable authority and executive management. Early identification of potential issues, through regular monitoring and reporting, enables the accountable authority and executive management to refine existing arrangements, provide further training or guidance to officials, manage expenditure on travel and manage any non-compliance.

Reporting to executive management

International travel reports

3.91 From January 2023 to August 2024, the CFO reported monthly on international travel expenditure and travel proposals to the Executive Board with the exception of September 2023, October 2023 and January 2024. The reporting provided information on the traveller, division, branch, destination country, start and end dates, estimated cost, and proposed future international travel (without a travel proposal approved). From August 2024, the CFO reported only on travel expenditure.

3.92 From July 2024, the Trade and International Division began providing an international travel proposal report to the Executive Board. This report provides details on travel dates; trip details (destination, purpose and division), expected return on investment; cost and staffing; and any Minister's office consultation or approval. Ministerial approval of travel in the samples tested by ANAO related to DAFF support for military activities, joint activities with the Department Foreign Affairs and Trade in foreign countries and activities under bilateral engagements with other countries.

Reporting on non-compliance

3.93 DAFF's Chief Finance Officer (CFO), Executive Board and division heads receive reporting on non-compliance with the PGPA Act and related requirements.

- The CFO receives quarterly reports on non-compliance, including travel.⁵⁸
- The CFO provides compliance reports to the Executive Board at each meeting which report on non-compliance with travel requirements.

⁵⁸ These reports were monthly until January 2025.

- Division heads receive monthly pending non-compliance reports for finalising of non-compliance reporting. The reports include all non-compliance, including travel.

3.94 The monthly reports to the CFO included instances of non-compliance with the approval requirements of section 23 of the PGPA Act for travel (see paragraphs 3.76 to 3.77) and mandatory elements of WoAG Arrangements reported by officials (see paragraph 3.79 for information on the identification of instances of non-compliance). Between 1 July 2022 and 31 December 2024, the top non-compliance themes were:

- booking accommodation outside of the TMS supplier; and
- misuse of credit cards to pay for meals and incidentals.

3.95 Unacquitted expense reporting to division heads commenced from September 2023, and to the Executive Board from October 2023. The CFO continues to report on unacquitted expenditure through monthly reports to the Executive Board.

3.96 In an October 2023 report, it was reported there were \$232,763 of accommodation expenses covering 2021 to 23 June 2023 that were unacquitted as invoices needed to be received from the TMS supplier and entered into Concur. By February 2024, unacquitted accommodation expenses were reported as \$63,547 after the receipt of invoices. After this, reports have not identified unacquitted accommodation expenses as requiring the attention of the Executive Board.

Responding to Questions on Notice on official travel

3.97 Questions on Notice relating to official travel have been asked during Senate Estimates. DAFF took 31 Questions on Notice on travel between 1 July 2022 and 14 February 2025. The department responded to all questions. Ten were responded to beyond 30 days — on average, responses were 17 days late. On 20 August 2025, DAFF advised the ANAO that it is required to provide responses to the Minister's office and the Minister responds to all questions.

3.98 Of the 31 responses to Questions on Notice:

- twenty-six included reporting on travel expenditure — the figures reported in the department's response were complete and accurate to within five per cent of data from the financial management system⁵⁹;
- four reported on the number of international visits undertaken by staff — the ANAO was not able to confirm the completeness and accuracy of the reported numbers due to issues with data from the TMS system (see paragraphs 3.3 and 3.4); and
- one reported on the processes to 'monitor, audit, or otherwise' ensure that available flights were being selected to minimise the costs to the Australian taxpayer — DAFF's response was consistent with its internal travel policies.

59 On 20 August 2025, DAFF advised the ANAO that some travel related expenditure was not included in the reporting for 10 responses. Four responses did not include the WoAG fees. Two did not include WoAG fees and car hire costs. Two did not include expenses relating to COVID-19 vaccine travel, taxis and overseas counsellor's regional travel. Two did not include car hire costs.

Annual report

Financial statements

3.99 DAFF's annual reports include the department's financial statements as required by subsection 43(4) of the PGPA Act. The ANAO audits the financial statements, and key expenditure items, on a materiality basis, in accordance with the auditing standards. For DAFF, expenditure items related to travel fall below the threshold for detailed testing by the ANAO for financial statements audit.

3.100 DAFF uses expenditure data from its financial management system, TechnologyOne, to report on travel expenditure in its annual report.

3.101 The ANAO reviewed DAFF's reporting on its travel expenditure in its 2022–23, 2023–24 and 2024–25 annual reports. When compared to the department's financial statements figures from TechnologyOne, the ANAO identified differences between the amounts reported. Table 3.5 shows that the differences were four per cent in 2022–23 and eight per cent in 2023–24. DAFF advised the ANAO on 28 March 2025 that there was a mapping difference in the model for the financial statements which meant that expenditure for car hire and WoAG fees were not mapped to the overall travel costs.

Table 3.5: Difference in reported travel amounts

	2022–23	2023–24	2024–25
Travel expenditure reported in the DAFF annual report (\$)	24,465,000	24,026,000 ^a	29,855,000
TechnologyOne (\$)	25,579,328	26,201,701	29,854,030
Difference (\$)	1,114,328 (4%)	2,175,701 (8%)	970 (<1%)

Note a: The 2023–24 DAFF Annual Report disclosed this figure as \$24,026,000. The figure has been updated to \$26,203,000 in the 2024–25 Annual Report as some expenses were reclassified from goods and services to align with the current year's reporting presentation.

Source: ANAO analysis.

Non-compliance

3.102 Under section 19 of the PGPA Act, accountable authorities are required to notify responsible Ministers, as soon as practicable, of any significant non-compliance with the finance law. Entity annual reports are required to include a statement of any significant issues reported to the responsible Minister under paragraph 19 (1)(e) of the PGPA Act that relate to non-compliance with the finance law.⁶⁰

60 Public Governance, Performance and Accountability Rule 2014 section 17BE (h).

3.103 In 2022–23 and 2023–24, DAFF did not identify travel non-compliance as being ‘significant’ for the purposes of annual reporting to the Minister.⁶¹ DAFF’s 2022–23 and 2023–24 annual reports included the following statements:

- ‘No instances of significant non-compliance with finance law occurred during 2022–23’; and
- ‘In 2023–24 there were no instances of significant non-compliance with finance law’.

3.104 In 2024–25, DAFF did not identify travel-related non-compliance as being ‘significant’.⁶² DAFF reporting to its Audit and Risk Committee on 17 September 2025 identified that there were 26 instances of travel-related non-compliance in 2024–25, compared to five instances in 2023–24. The overarching approval and expenditure identified in paragraphs 3.10 to 3.12 was not included in this reporting.

Opportunity for improvement

3.105 DAFF could consider if the overarching approval and associated expenditure meets the definition of ‘significant’ non-compliance with finance law for reporting to the Minister and in the department’s annual report.

Reporting to the Department of Finance

3.106 On 20 August 2025, DAFF advised the ANAO that it had reported the following issues to the Department of Finance:

- significant delays in receiving invoices particularly for accommodation, outside the department’s control and [sic] affected the ability of staff to acquit transactions in a timely manner.
- significant challenges in booking accommodation, particularly in remote regional areas where there was limited accommodation via the providers.
- hotels were being cancelled despite confirmations being received, resulting in health and safety concerns for our staff particularly in remote areas.
- the new charge back facility which CTM set up with their contracted hotels was not working as it should for some hotels. As a result, hotels were requesting staff to pay for accommodation upon check in. This is despite travellers receiving confirmation of the accommodation booking from CTM. Furthermore, department travel officers were contacting hotels and explaining the existence of the CTM charge back process and/or contacting CTM to reverse direct charges and reapply the chargeback.

61 Department of Finance guidance states that ‘If an entity has not notified its responsible Minister of any significant non-compliance during the reporting period, it may wish to consider including a comment to that effect in its annual report’. Department of Finance, *Additional reporting in the annual report* (Resource Management Guide 214), Finance, Canberra, 2024, available from <https://www.finance.gov.au/government/managing-commonwealth-resources/notification-significant-non-compliance-finance-law-rmg-214/additional-reporting-annual-report> [accessed 15 July 2025].

62 Department of Finance, *Finance law and significant non-compliance*, available from <https://www.finance.gov.au/government/managing-commonwealth-resources/notification-significant-non-compliance-finance-law-rmg-214/finance-law-and-significant-non-compliance> [accessed 15 September 2025].

- hotels in the CTM portal for a particular area were all displayed as 'unavailable', yet when staff contacted the hotel, there was availability.
- CTM consultants were advising travellers to pay hotels with their corporate credit card, which is a direct breach against department travel policy and WoAG travel arrangements.
- CTM consultants were advising travellers to book hotels direct as they cannot contact them.



Dr Caralee McLiesh PSM
Auditor-General

Canberra ACT
7 November 2025

Appendices

Appendix 1 Entity response



Australian Government
Department of Agriculture,
Fisheries and Forestry

JUSTINE SAUNDERS APM
ACTING SECRETARY

Dr Caralee McLiesh PSM
Auditor-General for Australia
Australian National Audit Office
GPO Box 707
Canberra ACT 2601


Dear Dr McLiesh

Thank you for your email of 2 October 2025 regarding the Australian National Audit Office's (ANAO) proposed audit report - *Compliance with domestic and international travel requirements in the Department of Agriculture, Fisheries and Forestry*.

Pursuant to section 19 of the *Auditor-General Act 1997*, the Department of Agriculture, Fisheries and Forestry (the department) has prepared a response to the report for your consideration.

The department is committed to ensuring domestic and international travel arrangements comply with WoAG requirements and welcomes the ANAO's observations that it has established largely appropriate arrangements for managing domestic and international travel in accordance with the WoAG arrangements.

The department acknowledges the two recommendations, which focus on improving domestic travel approval documentation and record keeping for domestic and international travel approvals, with work already underway to address these recommendations.

I can confirm the department has been methodically investing in its travel operations over the past 24 months. The audit testing conducted by the ANAO covered a period of unprecedented change for the department with major Machinery of Government changes fragmenting existing resourcing between agencies, and the mandated requirement to transition to the new WoAG travel provider. While managing these challenges, the department has taken the initiative to conduct two travel internal audits while concurrently uplifting processes, systems and resources to ensure we have a strong, compliant and accountable travel function.

I thank the ANAO for its engagement throughout the audit process. Please find enclosed the department's response to the recommendations and suggested editorial changes. If you have any questions please contact Anora Harris, Director Internal Audit and Assurance at anora.harris@aff.gov.au.

Yours sincerely


Justine Saunders
27 October 2025

T +61 2 6272 3933
F +61 2 6272 5161

Agriculture House
70 Northbourne Ave
Canberra ACT 2600

GPO Box 858
Canberra ACT 2601

agriculture.gov.au
ABN 34 190 894 983

Appendix 2 Improvements observed by the ANAO

1. The existence of independent external audit, and the accompanying potential for scrutiny improves performance. Improvements in administrative and management practices usually occur: in anticipation of ANAO audit activity; during an audit engagement; as interim findings are made; and/or after the audit has been completed and formal findings are communicated.
2. The Joint Committee of Public Accounts and Audit (JCPAA) has encouraged the ANAO to consider ways in which the ANAO could capture and describe some of these impacts. The ANAO's corporate plan states that the ANAO's annual performance statements will provide a narrative that will consider, amongst other matters, analysis of key improvements made by entities during a performance audit process based on information included in tabled performance audit reports.
3. Performance audits involve close engagement between the ANAO and the audited entity as well as other stakeholders involved in the program or activity being audited. Throughout the audit engagement, the ANAO outlines to the entity the preliminary audit findings, conclusions and potential audit recommendations. This ensures that final recommendations are appropriately targeted and encourages entities to take early remedial action on any identified matters during the course of an audit. Remedial actions entities may take during the audit include:
 - strengthening governance arrangements;
 - introducing or revising policies, strategies, guidelines or administrative processes; and
 - initiating reviews or investigations.
4. In this context, the below actions were observed by the ANAO during the course of the audit. It is not clear whether these actions and/or the timing of these actions were planned in response to proposed or actual audit activity. The ANAO has not sought to obtain assurance over the source of these actions or whether they have been appropriately implemented.
 - Updating the airline lounge membership policy to specify that 'significant' travel is defined as a minimum of 10 return trips per year (paragraphs 3.62 and 3.64).
 - Mandating the attachment of the PGPA subsection 23(3) approval to the travel request in Concur (paragraph 3.28).
 - Requiring that gifts and benefits received or rejected are declared within 14 days (paragraph 3.72).