

The Anguilla House of Assembly

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Public Accounts Committee

**INQUIRY INTO THE FINANCIAL AND ACCOUNTING PRACTICES
OF THE ANGUILLA TOURIST BOARD**

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BACKGROUND AND INTRODUCTION

1. On March 14th the Public Accounts Committee (“PAC”) of the Twelfth Anguilla House of Assembly launched its first public inquiry into the Financial and Accounting Practices of the Anguilla Tourist Board (“ATB”).
2. The Anguilla Tourist Board was established by Act 16 of 1993 passed by the Anguilla House of Assembly. The ATB was formalized for the encouragement, promotion and development of tourist travel to Anguilla, for adequate and efficient tourist services for Anguilla and for matters connected therewith or incidental thereto. The objects and duties of the Board are set out in section 3 and 4 of the Act.
3. As a Government statutory body, the ATB is subject to audit by the Chief Auditor in accordance with section 59 of the Financial Administration and Audit Act, R.S.A. c. F27. Part 2 of the Anguilla Tourist Board Act sets out the framework for Financial Reporting and Audit of the Accounts of the Board.
4. The Purpose of the inquiry was to examine the concerns raised by the Chief Auditor, and any other related issues, so as to understand the causes surrounding the issues highlighted. To guide its work, the Committee agreed on three main objectives.

These were:

- (a) Review historical and current financial and accounting practices of the Anguilla Tourist Board (ATB)
 - (b) Examine the concerns raised by the Chief Auditor and any other related issues, so as to:
 - i. Understand the causes surrounding; issues highlighted
 - ii. Establish progress by the ATB towards addressing those concerns
 - iii. Propose action to remedy those and any further concerns highlighted throughout the inquiry
 - (c) Establish what good financial and accounting practices should look like as it regards to the ATB.
5. The PAC Chair noted the pleasure to commence the first inquiry of the ATB since its inception in 1993. As in any other institution, undoubtedly some internal practices and procedures would have been well executed, while others would have required revision over the years so as to improve economy, efficiency and effectiveness. The PAC looks forward to working with persons at the ATB, the Ministry of Tourism and other stakeholders in order to ensure the continued success of the ATB in the future.
 6. The Public Accounts Committee (PAC) is a standing Committee of the Anguilla House of Assembly. It is comprised of Opposition Members; Mrs. Cora Richardson Hodge (Hon) Chair of the Committee, Mr. Cardigan Connor (Hon), Mr. José Vanterpool (Hon) and

Government Members; Mr. Merrick Richardson (Hon), and Mrs. Quincia Gumbs-Marie (Hon). Unfortunately, Mrs. Quincia Gumbs-Marie recused herself from the ATB Inquiry due to potential conflict of interest as Parliamentary Secretary with responsibility for Tourism.

7. The Committee reviewed documents related to the subject at hand. These include but are not limited to:
 - a. Anguilla Tourist Board – Audit of Accounts 2012
 - b. Anguilla Tourist Board – Audit of Accounts 2013
 - c. Anguilla Tourist Board – Audit of Accounts 2014
 - d. Anguilla Tourist Board – Audit of Accounts 2015
 - e. Anguilla Tourist Board – Audit of Accounts 2016
 - f. Anguilla Tourist Board – Audit of Accounts 2017
8. The Committee requested written evidence from the ATB prior to and at the end of the inquiry. The committee received all requested information.
9. Lines of Inquiry focused on the following:
 - a. The financial practices of the Anguilla Tourist Board.
 - b. The regularity requirement for auditing purposes.
 - c. Views of the role of the Anguilla Tourist Board.
 - d. The financial practices of the Anguilla Tourist Board.
 - e. The procurement practices of the Anguilla Tourist Board.
 - f. The impact of the issues highlighted by the Auditor General in the 2017 report.
 - g. Updates on written policies
 - h. The plans of the Anguilla Tourist Board post the Auditor General’s Report.
10. The Committee heard oral evidence in public from the following persons based on the following schedule:

Name	Date
Auditor BDO, LLC, Mr. Claudel Romney	14 Mar 2022
Ministry of Finance	
Permanent Secretary Finance, June 2020 - present, Mrs. Kathleen Rogers	14 Mar 2022
Former Permanent Secretary Tourism, January 2012 – July 2020 Dr. Aidan Harrigan	14 Mar 2022
Former Permanent Secretary Tourism, 2012-2016, Mr. Merwyn Rogers	11 April 2022

Ministry of Tourism	
Permanent Secretary Tourism, June 2020 – present Mr. Karim Hodge	23 Mar 2022
Chair ATB Board	
ATB Board Member 2017-2019 and Chairperson Anguilla Tourist Board, 2020 to present – Mr. Kenroy Herbert	22 Mar 2022
Former Chairperson Anguilla Tourist Board, 2015-2020 – Ms. Donna Banks	16 & 22 March 2022
Former Chairperson Anguilla Tourist Board, January – May 2015 – Mr. Ralph Hodge	16 Mar 2022 NT
Former Chairperson Anguilla Tourist Board, May - October 2014 - Bonnie Bloom	13 April 2022
ATB Board Member 2010-2015 including Former Chairperson Anguilla Tourist Board, May 2013 – June 2014 – Mr. Oliver MacDonna	15 Mar 2022 NT
Former Chairperson Anguilla Tourist Board, 2010 - 2012 – Mr. Eustace Guishard	15 Mar 2022
Former Chairperson Anguilla Tourist Board, August 2012 – April 2013 - Mr. Leslie Richardson	11 April 2022
ATB Director	
Director of Anguilla Tourist Board, Mrs. Stacey Liburd 2020 – present	13 April 2022

RECOMMENDATIONS

Recommendation 1 – the ATB Board should appoint an auditor to handle the financial statements backlog.

Recommendation 2 – That the Ministry of Finance should present a report to the PAC on the improvements made with respect to the oversight of the ATB by December 2023.

Recommendation 3 – That after the first year of operation under the Anguilla Public Procurement and Contract Administration Act, 2011, the ATB ought to conduct a short post procurement review, when the Procurement Board is used. To which the ATB and Ministries of Tourism and Finance can contribute their views on (a) what went well, (b) what did not go well, (c) what could be changed or improved and (d) any proposals for change; at the end of the year these reviews should be collated and a plan for any changes to future methods of working, including any legislative revision, should be implemented.

Recommendation 4 – That the ATB Board should report to the PAC by October 1, 2022 on the status of the Vacant CMO position.

Recommendation 5 – That the ATB should consider measures to identify return on investment throughout their operations.

Recommendation 6 – The ATB should provide the final copy of all aforementioned policies and by-laws when these are final with a note of the date on which they will or have taken effect; this should be no later than 31 December 2022.

Recommendation 7 – The Permanent Secretaries of each Ministry responsible for other statutory boards should undertake due diligence checks to ensure that appropriate governance policies, including but not limited to those mentioned above, exist across all such bodies receiving a subvention as a means of good practice.

Recommendation 8 – The ATB should maintain an asset register relating to stocks of collateral, exhibition and presentation equipment stored overseas; an annual stocktaking exercise should be undertaken by an officer travelling to the region.

Recommendation 9 – Asset capitalisation should be included in the ATB accounting and procedure policy currently being drafted.

Recommendation 10 – The contractually stated approval procedures must be followed and upon asking for approval, the ATB Board must ensure that they receive a copy of the contract between the overseas representatives and the sub-contractor and before giving approval must ensure that there is no risk of ATB liability.

Recommendation 11 – Strategic decisions such as a ‘Ferry Terminal’ and similar matters should be channeled through the Ministry. All approvals must be received before any payments are made from the ATB’s Subvention.

Recommendation 12 – An official meeting to forward plan comprising the PS Tourism, the Ministry and the ATB should be carried out with the New Managers of the SXM-AXA Ferry Terminal before 2022 year end.

Recommendation 13 – That appropriate legislation be brought forward to establish an Appointments Commission for Anguilla; this body will be responsible for undertaking a merit based selection process for all statutory body board appointments; the final recommendations will be laid before the House of Anguilla Legislative Assembly for approval.

Recommendation 14 – That Board Chairs for all statutory bodies should serve for a period of two and a half years and be eligible for reappointment.

Recommendation 15 – Add a retention policy statement to the administrative policy for all statutory bodies setting out the principle that all records belonging to the statutory body and any records, or copies of records, held by individuals must be surrendered to the statutory body at the conclusion of any period of service with that body.

Recommendation 16 – The ATB Board should consider publishing a breakdown of the costs associated with attending off island events, financial support for Anguillian events and business support, and promotional activities alongside any post event reports; this can be done 6-12 months in arrears if commercial confidentiality is a factor.

Recommendation 17 – The ATB should have a dedicated monitoring and evaluation function to calculate the economic value for money of their work and monies provided to promotional activities on island; results should be reported annually to the Ministries of Tourism and Finance.

AUDIT

11. This inquiry was initiated after the Financial Statements of the Anguilla Tourist Board 2012 to 2017 were laid before the House of Assembly on May 25, 2021. These audit reports highlighted a number of issues on which we have reflected and taken evidence.
12. Section 65 of the Financial Administration and Audit Act (Revised Statutes of Anguilla Chapter F27 as at 15 December 2010) (FAA Act) requires the ATB to submit an annual report; and the requirements for how these Financial Statements are to be audited are set out in sections 59(2), (6) and (7) of the (FAA Act).¹
13. The audit reports are comprised of an opinion on the financial statements and, since 2015,² under section 52 of the (FAA Act) an opinion on regularity. Before examining each of these opinions in more detail, we will comment on the timeliness of the audit process.

Appointment of Auditors and Timeliness of Audit

14. Immediately of concern was the lateness of these reports. In 2022 we have received reports only to 31 December 2017, so five years ago.
15. We asked Mr. Romney about the process under which BDO, the company undertaking the audits, was appointed. He told us that BDO was engaged by the ATB subject to approval of the National Audit Office (NAO)³. He explained that BDO would complete the fieldwork and produce their report and that there would be a subsequent overlay report completed by the NAO before finally being laid before the House of Assembly.⁴ It was noted that the sign off date for the 2017 report was 22 February 2020⁵ and for the overlay report 11 Jan 2021.⁶
16. Mr. Romney advised us that BDO has not been undertaken audit work beyond 2017.⁷ However, Mrs. Liburd confirmed that the ATB Board were reviewing the first draft of the 2018 audit and that she thought the 2019 had not progressed due to the pandemic.⁸
17. Whilst not strictly within the scope of this inquiry, we are also concerned to note that the most recent completed audit of the Consolidated Fund is for the year 2016. We note that there is a statutory requirement for the Accountant General to prepare and certify the public accounts for submission to the Chief Auditor within six months of the financial year end. The Accountant General has recently confirmed that the 2017 – 2020 accounts were submitted to the Auditor General in Wales in a timely manner awaiting final approval and report from the Chief Auditor.

¹ [ANGUILLA TOURIST BOARD Financial Statements December 31, 2017 p1](#)

² 14 Mar 2022 @10.00

³ 14 Mar 2022 @1.04.00

⁴ 14 Mar 2022 @ 1.04.45

⁵ [ANGUILLA TOURIST BOARD Financial Statements December 31, 2017 p7](#)

⁶ [ANGUILLA TOURIST BOARD Financial Statements December 31, 2017 p4](#)

⁷ 14 Mar 2022 @ 1.03.00

⁸ 13 April 2022 @ 3.35.05

18. We acknowledge that there has been a delay in completing accounts and audit reports following Hurricane Irma and the Covid-19 pandemic; in particular this would have affected the ability of officers from the Welsh Audit Office, who provide external audit services to travel to Anguilla.
19. The audit backlog impeded the PAC's ability to provide proper or up to date scrutiny on the ATB board. Inability for witnesses to remember information due to the time span of 10 years was a hindrance in the process.

Conclusion – We conclude the audit backlog now needs to be cleared to ensure the proper oversight of the use of public funds and to permit timely scrutiny.

Recommendation 1 – the ATB Board should appoint an auditor to handle the audit backlog.

Financial Statements

20. Turning to the details of the reports about the ATB, we are pleased to note that the Audit of the Financial Statements to 31 December 2017 in the opinion of the auditor 'present fairly, in all material aspects, the financial position of the Board ... in accordance with International Financial Reporting Standards.'⁹

Regularity Requirements

21. The second opinion the auditor is required to give is 'whether all money appropriated or otherwise disbursed is applied to the purpose for which the House of Assembly intended to provide, and that the expenditure conforms to the authority that governs it.'¹⁰
22. In each of the reports, from 2015 to 2017, the auditor was unable to provide an audit opinion on regularity due to a number of scope limitations.¹¹ We wrote to the ATB to ask them what progress had been made with addressing the ten issues set out in the 2017 report;¹² we also asked a number of witnesses about these issues in evidence. We comment on each of these in turn.

Point (a) Budget Process and Expenditure Oversight

23. The first limitation related to the budget process:

a) We were not provided with any evidence of approval by the Board of Directors, appropriate Minister, Minister of Finance as well as approval by the House of Assembly on the Board estimates of its recurrent revenue, expenditure and capital. The approved

⁹ ANGUILLA TOURIST BOARD Financial Statements December 31, 2017 p7

¹⁰ FAA Act s52(d)

¹¹ 2015-2017 ANGUILLA TOURIST BOARD Financial Statements p4

¹² ANGUILLA TOURIST BOARD Financial Statements December 31, 2017 p4-6

budget should have been used as a benchmark in order for us to make appropriate checks as we consider necessary to enable us to form an opinion in accordance with Section 52 of the Financial Administration and Audit Act.

24. There are two parts to this limitation, as they existed up to 2017; the perception of a lack of evidence of approval and the approved budget not being available to use as a benchmark.
25. Mr. Romney told us that, in his opinion, the requirements of the FAA Act are not easy to achieve in practical terms. He explained that the ATB will request a budget for the following year, the Ministry of Finance will decide what is permitted and the House of Assembly makes the final approval. He suggested that there is no subsequent line by line approval of how the agreed budget is then allocated;¹³ he commented that without this, subsequent benchmarking is difficult.
26. The ATB told us that “in 2018 the ATB shifted its approach to budgeting by allowing each unit to develop extensive plans for the upcoming year and assign appropriate budgetary estimates and key performance indicators to those plans.”¹⁴ Mr. Herbert confirmed this, commenting that since the 2017 restructuring of the operations teams in the ATB each now prepared their own forward plans for the year and under this system the budget had been much easier to put together.¹⁵ Mrs. Liburd explained that the ATB prepared a budget by considering changes to the previous year and that this is reviewed by the ATB Board and also at a separate meeting with the Chair where there is a line by line review before this is submitted to the Ministry.¹⁶
27. Mrs. Rogers, current PS Finance, told us that the ATB submitted a work plan as part of the budget process which is reviewed before the amount of the subvention is agreed first by the Executive Council and then the House of Assembly.¹⁷ Mr. Hodge, current PS Tourism, confirmed that business and marketing plans would be submitted to the Ministry as part of the budget call; and that these would be approved by the Tourism and Finance Ministries, Executive Council and the House of Assembly.¹⁸

Conclusion – Based on the evidence we have heard, we conclude the current budget approval process, which now includes oversight of the business and marketing plans, is fit for purpose and we would encourage the ATB and the Ministry of Tourism and Finance to continue active engagement during the annual budget call.

28. The second part of this limitation speaks to the subsequent monitoring and oversight of actual expenditure against the amount budgeted.

¹³ 14 Mar 2022 @ 26.00

¹⁴ [24 Jan 2022 Letter from ATB p1](#)

¹⁵ 22 Mar 2022 @ 1.41.40

¹⁶ 13 Apr 2022 @ 4.05.00

¹⁷ 14 Mar 2022 @ 1.45.20

¹⁸ 23 Mar 2022 @ 4.15

29. Mr. Hodge told us that funds are disbursed monthly for work set out in the ATB business and marketing plans and the ATB is responsible for monitoring spending. He explained that the ATB has to provide quarterly progress reports. He confirmed there are also quarterly meetings between representatives of the ATB and the Ministry of Tourism at which any concerns from either side can be raised.
30. He went on to say that in his view, oversight from the Ministry is not yet sufficient; that they rely on the ATB Board. He acknowledged a previous recommendation that had suggested a body to oversee all the boards but acknowledged that there was no capacity to do that within his Ministry to ensure all the business plan tasks are being carried out.¹⁹
31. Mrs. Rogers reported that the Ministry of Finance did not currently have the capacity to look at the actuals on a regular basis but that they were in process of recruiting someone to assess the performance of the statutory bodies including ATB.

Conclusion – We support the Ministry of Finance proposal in relation to having a dedicated officer to undertake oversight of the statutory bodies.

Recommendation 2 – That the Ministry of Finance should present a report to the PAC on the improvements made with respect to the oversight of the ATB by December 2023.

Point (b) Procurement Policies and Contracts

32. The second limitation concerned a lack of written procurement policies:

b) The Board doesn't have written procurement policies to be used as a benchmark in entering into contractual agreements and appointing agents to represent the Board. These policies are needed and should have been used as a benchmark in order for us to properly make checks as we consider necessary to enable us to form an opinion in accordance with Section 52 of the Financial Administration and Audit Act.

33. Mr. Romney told us that contracts they saw were general in nature, covering legal terms and conditions but did not drill down, for example, to include milestones or Key Performance Indicators (KPI) to ensure ATB is getting value for money; there was no evidence of documentation about how the performance against the contracts should be evaluated.²⁰
34. Mr. Herbert explained that the ATB is now required as at 2021 to adhere to the requirements in the Anguilla Public Procurement and Contract Administration Act, 2011.²¹ He explained this was relatively new and he had some concerns about the time it would take for contracts to be agreed; and whether it was practical to use the Government of

¹⁹ 23 Mar 2022@ 9.15

²⁰ 14 Mar 2022 @ 29.05

²¹ [24 Jan 2022 Letter from ATB p2](#)

Anguilla Procurement Board for some of their contracts which were, for example, sometimes very reactive or would be negotiated via overseas representatives.²²

35. Mrs. Liburd commented that the process the ATB is now required to follow requires a lot of paperwork. She explained that for some purchases, for example, for sales and marketing materials known as collateral, that they would previously have ordered everything from a supplier who could provide all that was needed and that this, and previous purchasing, would mean prices were discounted. Booking for roadshows was another example, the best event for marketing the brand, facilities and travel safety would all be considerations alongside price. Under the Act being required to get three quotes causes delay; they recently had to attend a roadshow without the necessary collateral. She went on to say that she understood the need for the process, for transparency and to ensure value for money and that the officers were working with the ATB to find solutions. Sole source, which means procuring goods, works or services from a single entity when the estimate of the amount of the contract is the amount for large procurements as an option being explored for roadshows.²³
36. Mr. Romney also spoke about the contracts in place with the overseas agents. He expressed a concern about these being general in nature and lacking in financial detail and performance targets.²⁴
37. Ms Banks advised that the contracts issued in her time as Chair had been legally drafted.²⁵ Mr. Herbert confirmed that overseas representatives' contracts had been reviewed and renegotiated during the pandemic;²⁶ a number of anomalies, such as the payment of a car allowance and private medical insurance, had been removed at this time and overall costs had been reduced.²⁷ Mrs. Liburd confirmed that the contracts were at the point of being renegotiated again and were currently operating month to month while the way in which these would be procured under the Act was being worked out;²⁸ Mr. Herbert commented this presented another opportunity for renegotiation.²⁹
38. Mr. Hodge said that he thought the procurement process was effective, bringing value for money, transparency and openness, but that it does require planning ahead. He encouraged the ATB to discuss any challenges with the procurement office as he was sure that a way forward, within the legislation, could be found.³⁰

Conclusion - We understand the desire to regularize the procurement processes of the ATB and support the application of the legislation; however, we acknowledge that sometimes the ATB may need to act more quickly than the process allows and to assist

²² 22 Mar 2022 @ 1.44.00

²³ 13 Apr 2022 @ 4.09.20

²⁴ 14 Mar 2022 @ 29.05

²⁵ 16 Mar 2022 @ 1.37.45

²⁶ 22 Mar 2022 @ 35.55

²⁷ 22 Mar 2022 @ 17.20

²⁸ 13 Apr 2022 @ 4.09.20

²⁹ 22 Mar 2022 @ 35.55

³⁰ 23 Mar 2022 @ 15.00

all parties in understanding when and why this may be the case and make the following recommendation.

Recommendation 3 – That after the first year of operation under the Anguilla Public Procurement and Contract Administration Act, 2011, the ATB ought to conduct a short post procurement review, when the Procurement Board is used, to which the ATB and Ministries of Tourism and Finance can contribute their views on (a) what went well, (b) what did not go well, (c) what could be changed or improved and (d) any proposals for change. At the end of the year these reviews should be collated and a plan for any changes to future methods of working, including any legislative revision, should be implemented.

Point (c) Performance Management of Overseas Representatives

c) No reports or documentation exists on the various overseas marketing representatives' performance during the year before renewing their contract for the auditor to review. There were no set of guidelines to determine whether these representatives are performing based on the Board's and Anguilla's expectations.

39. Alongside the concerns about the specificity of the terms and conditions in the contracts for the overseas representatives, Mr. Romney commented on a lack of documentation in relation to review of performance.³¹

40. The ATB confirmed that:

As part of the ATB's restructuring, the Board made provisions for a Coordinator International Markets (Job description is attached as Exhibit 1). This position was envisaged to provide overseas representatives with greater oversight, more direction and a more intimate reporting structure within the ATB. Since 2018, all overseas representatives are required to submit monthly reports that outline their in market activities and achievements each month. One of the shortcomings of the ATB has always been its lack of expertise in the area of setting key performance indicators, bench marks and evaluating return on investment in the overseas markets. Therefore, it was thought that a Chief Marketing Officer role would be valuable in helping the ATB to achieve such. The role was advertised on 2 occasions but in both instances the Ministry of Finance advised against filling the role due to the island's less than ideal financial position in the wake of Hurricane Irma. In 2021, the Board once again advertised the position and successfully appointed the Chief Marketing Officer in April 2021. The Chief Marketing Officer is now tasked with setting guidelines and evaluating the performance of all overseas representatives (Job description is attached as Exhibit 2).³²

³¹ 14 Mar 2022 @ 34.00

³² [24 Jan 2022 Letter from ATB p2](#)

41. Mrs. Liburd confirmed this was still the case commenting that although there have been fewer roadshows, there is monthly reporting which is followed up with a call; on sales calls, cold calling, story pitches and strategy, including trends and travel news for the region. She explained these reports are collated and distributed to stakeholders. She went on to say that there is a framework for the Ministry that the overseas representatives are guided by which covers scope of work and core responsibilities for the 5 markets, UK, Canada, Italy, Latin America, US; they also have KPI's.³³
42. Mrs Liburd added that for each year the target is an increase in arrivals from the markets of say 5-10%; she explained that the target used to be 20% but this felt a bit high and different benchmarks are appropriate for various markets. The arrivals statistics are reviewed monthly and if the target has not been met, reasons why are looked at.³⁴
43. After receiving evidence in preparation of the ATB report, the committee noted shortly after, the position of CMO is once again vacant with no certainty as to when it will be filled. The committee is concerned that in the absence of the CMO issues raised will continue to exist.

The PAC is concerned that the objectives of the ATB will not be achieved due to the vacant position of the CMO.

Recommendation 4: That the ATB Board should report to the PAC by October 1, 2022 on the status of the Vacant CMO position.

Point (d) Performance Management of Marketing Initiatives

d) There were no reporting and review of the following as stipulated in the contracts of each marketing representatives:

- status of marketing activities;*
- the benchmarking with the monthly planned initiatives versus the actual;*
- the monthly ROI and KPI's and documentation of the effect of the marketing activities to the tourism industry of the island*

As a result, we cannot corroborate the expenses recorded in general to the planned initiatives of each of the representatives.

44. Miss Banks told us the ATB Board would approve events, and the budget, organized by the overseas representatives in advance. The representatives would usually pay for these as ATB did not have sufficient cash flow, and then invoice ATB with supporting documentation. She explained that after the event, the actual expenditure would be

³³ 13 Apr 2022 @2.23.45

³⁴ 13 Apr 2022 @2.44.40

compared to the budget and any material difference would have to be investigated. She recalled an incident of unexpectedly high shipping cost which was due to late shipping and expressed charges; the representatives were advised that they would be expected to cover the costs if this were to happen again.³⁵

45. Mrs. Liburd outlined a change in approach; that following the contract renegotiations with the overseas representatives, during the pandemic, the ATB has taken a more direct role in attending events. In the period June – Dec 2021 ATB officers traveled to a number of events themselves, sometimes working in conjunctions with the representatives. Mrs. Liburd said that this cost the ATB in the region of US\$65,000³⁶ and had proved valuable in terms of information gathering, noted were:

- Event visitors like to meet representatives from Anguilla including named officials and ATB Board members at events ³⁷
- Some events attended e.g. TravellerMade³⁸ were felt to be less suitable for ATB and would not be attended again³⁹
- Some events were more suitable for certain offerings e.g. Travel and Adventure⁴⁰ for mid-market and charming escapes⁴¹

46. We asked about the approach to marketing different types of properties noting that luxury accommodation brands could afford to do more, attending shows in their own right, which mid-market owners could not do. Mrs. Liburd explained that the ATB has responsibility for marketing Anguilla as a destination but that the presentation they use incorporates a number of key messages which includes highlighting the different accommodation types available.⁴²

47. Mrs. Liburd advised that there is intention to continue travelling; a number of events had already been attended in 2022, at an estimated cost of US\$45,000,⁴³ by staff from the marketing and destination teams. She explained that attendance was on rotation as being on the road could be intense, with long days for travel, set up, manning the booth at the shows and additional evening meetings so it was important to ensure officers did not burn out.⁴⁴

48. The new travel approach in which the ATB has adopted allows them to positively compare figures to previous years. Mrs. Liburd told the Committee she wants to use the next couple of years to show responsible spend and the overall potential of the ATB. Additionally to

³⁵ 22 Mar 2022 Part 2 @ 2.00

³⁶ 13 Apr 2022 @2.14.40

³⁷ 13 Apr 2022 @ 2.18.10

³⁸ <https://travellermade.com/> accessed 16 Jun 2022

³⁹ 13 April 2022 @ 2.32.10

⁴⁰ <https://travelshows.com/> accessed 16 Jun 2022

⁴¹ 13 April 2022 @ 2.32.10

⁴² 13 Apr 2022 @2.52.30

⁴³ 13 Apr 2022 @ 3.01.45

⁴⁴ 13 Apr 2022 @2.18.10

show what the budget afforded and what it could not along with its consequences. By so doing, the ATB could have an opportunity to present a budget case.

Conclusion – We are concerned whether either approach will yield value for money. The new approach of the ATB officers attending events has only been in place for around a year and so it is not yet possible to fully understand whether this will offer better value for money than the previous approach.

Recommendation 5 – That the ATB should consider measures to identify return on investment considering the new approach the ATB has undertaken.

Point (e) International Travel and Subsistence Policies

e) The Board does not have written policies on international travel and subsistence. We have not received approved budgets for each international travel to make sure that expenses incurred are valid and within the approved limits.

49. The ATB told us that:

In 2021, a draft International Travel & Subsistence Policy was developed for the ATB. The Policy is currently being reviewed for submission to the board. A copy of the draft policy is attached as Exhibit 5. Additionally, the ATB's international travel budget is approved by the board each year through the established budgetary estimates process that the team under takes. The Board also approves staff travel to marketing events, activities and other tourism related travel throughout the year.⁴⁵

Point (f) Transportation, Subsistence and Per Diem Policies

f) The Board does not have written policies on transportation allowance, per diem, meal allowance, accommodation, etc. per type of individual visiting the Island for its hosting expenses. We have not received approved budgets for each hosting expense to make sure that expenses incurred are valid and within the approved limits.

50. The ATB told us that:

A Hosting Policy for the Anguilla Tourist Board is currently being written and a first draft is expected to be available by March 2022. Per Diem, meal allowances and accommodation has been addressed in the draft International Travel & Subsistence policy and will help to form the basis for on island hosting as well.⁴⁶

51. Mr. Herbert told us that policies in relation to points (e) and (f) were in the process of being drafted and that the ATB were currently following the GOA per diem allowances.⁴⁷

⁴⁵ [24 Jan 2022 Letter from ATB p3](#)

⁴⁶ [24 Jan 2022 Letter from ATB p3](#)

⁴⁷ 22 Mar 2022 @ 57.55

52. Mr. Herbert also explained that ATB officers were no longer asked to use personal funds for expenses; the ATB would usually pay in advance and when this was not possible, three officers had been issued with ATB credit cards for use when groups were travelling.⁴⁸
53. We asked about an occasion which had been reported in the local media where an officer, Mrs. Liburd, had used the ATB card for a significant personal purchase. He explained that she had asked him as her personal card wasn't working, he had not asked what the purchase was but just told her to refund the monies as soon as possible, which she had done.⁴⁹ We also asked the officer concerned, Mrs. Liburd, who said that with hindsight it was a real error of judgment for which she apologized.⁵⁰ She had written a report about the incident which is appended.⁵¹
54. Both Mr. Herbert⁵² and Mrs. Liburd⁵³ confirmed that the new policies prohibited the use of corporate cards for personal purchases. Although we were reassured, that Mr. Herbert did say that if he was asked in relation to a personal safety or emergency situation he would give permission.

Conclusion – We are content to accept there was an error of judgement and the apology offered. We conclude that lessons have been learned and policies are being implemented.

55. In addition to the policies highlighted above, Mr. Herbert advised that new by-laws have also been drafted for the ATB Board; these provide a more operational governance framework to supplement the requirements of the ATB Act.⁵⁴ A draft of these were provided to us and is appended.⁵⁵
56. Mrs. Liburd informed us that in addition to the policies mentioned previously, work is also underway on accounting procedure, whistleblowing, conflict of interest, gift and gratuity policies and the employee handbook are being reviewed and updated.⁵⁶

Recommendation 6 – The ATB should provide the final copy of all aforementioned policies and by-laws when these are final with a note of the date on which they will or have taken effect; this should be no later than 31 December 2022.

Recommendation 7 – The Permanent Secretaries of each Ministry responsible for other statutory boards should undertake due diligence checks to ensure that appropriate governance policies, including but not limited to those mentioned above, exist across all such bodies receiving a subvention as a means of good practice.

⁴⁸ 22 Mar 2022 @ 1.00.10

⁴⁹ 22 Mar 2022 @ 1.03.25

⁵⁰ 13 Apr 2022 @3.39.35

⁵¹ Appendix 2

⁵² 22 Mar 2022 @ 1.12.40

⁵³ 13 Apr 2022 @ 3.45.50

⁵⁴ 22 Mar 2022 @ 47.55

⁵⁵ [24 Jan 2022 Letter from ATB](#)

⁵⁶ 13 Apr 2022 @ 1.45.30

Point (g) Capitalisation of Purchases Policies

g) The Board does not have written policies over the capitalisation of purchases on supplies, furniture and equipment used in trade shows and exhibits. The Board's policy is to immediately recognize these as expenses upon purchase and not accounted nor recorded properly for monitoring and future usage.

57. This governance point was raised in relation to overseas events and the storage of collateral, exhibition and presentation equipment. A number of witnesses confirmed that shipping costs were reduced by having two international storage facilities. We asked whether the ATB kept an asset register of what was stored. Regarding the equipment, she thought that the overseas representatives would have a list but was not sure whether the ATB also had details.⁵⁷
58. Mrs. Liburd highlighted that the use of physical collateral was reducing, being replaced by the use of QR codes which was preferred.⁵⁸ These can be scanned and linked to a website (<http://:ivisitanguilla.com>) which provides relevant travel and marketing information about Anguilla.
59. Mr. Romney highlighted that it was also necessary to ensure that when assets, which can provide service over more than one year, were being purchased that they were accounted for appropriately as assets on the balance sheet.⁵⁹ The ATB confirmed that this policy was not yet in place.⁶⁰

Recommendation 8 – The ATB should maintain an asset register relating to stocks of collateral, exhibition and presentation equipment stored overseas; an annual stocktaking exercise should be undertaken by an officer travelling to the region.

Recommendation 9 – Asset capitalisation should be included in the ATB accounting and procedure policy currently being drafted.

Point (h) Overseas Representatives Sub Contracting Policies

h) The Board does not have policies over sub-contracted services made by overseas representatives. Per Anguilla Tourist Board Act, section 24, the Board has the power to enter into contracts and appoint agents to represent the Board outside Anguilla and to carry out such other functions as may be assigned to them by the Board in writing. In that case, the overseas representatives are under the power and supervision of the Board and thus, all contracts or sub-contracts entered into by the representatives on behalf of the

⁵⁷ 13 Apr 2022 @ 4.24.55

⁵⁸ 13 Apr 2022 @

⁵⁹ 14 Mar 2022 @ 41.50

⁶⁰ [24 Jan 2022 Letter from ATB p3](#)

Board should be preapproved and authorized by the Board before engaging the services. For the year 2017 PM Group in USA contracted Live Communication, Cision and PR Newswire while UK representative contracted White Tiger for its public relations activities without approved contractual arrangements. Due to the absence of contract, the Board does not have benchmarks or basis of the amounts paid to various sub-contracted companies other than to rely on the information submitted by its representatives.

60. Miss Banks told us that White Tiger was contracted with directly by ATB at the request of the UK representative in 2015; her recollection was that the contract was discussed by the Board and final approval was given in August 2015. She was unsure why the auditor had been unable to see that contract.⁶¹ She went on to say that she was aware of other PMG sub-contractors but they were retained directly by PMG and there was no concern regarding ATB liability as the services were routine for example, a phone company and further PMG had liability insurance.⁶²
61. The ATB told us that the overseas representatives' contracts stated that they were able to subcontract services with the approval of the ATB Board.⁶³
62. Our primary concern in this matter is not about the amount paid to sub-contractors or their performance management; we consider that the contractual relationship is between the overseas representatives and whomever they sub-contract with. The overseas representatives must ensure they are getting value for money and it is enabling them to deliver the services the ATB require. However, there is a potential risk to the ATB if the contract between the overseas representatives and the sub-contractor gives rise to any liability for the ATB.

Recommendation 10 – The contractually stated approval procedures must be followed and that on being asked for approval the ATB Board must ensure that they receive a copy of the contract between the overseas representatives and the sub-contractor and before giving approval must ensure that there is no risk of ATB liability.

Point (i) PMG Contract

i) The Portfolio Management Group is the Board marketing representative for the United States of America and Canada during the year with a total budget of EC\$1,745,000. The following are matters that hinder us from forming an opinion in accordance with Section 52 of the Financial Administration and Audit Act with regards to the PM Group:

- The marketing initiatives were general in nature and no guidelines on how the budget will be spent. Also, no review made or any assessment of the key performance

⁶¹ 16 Mar 2022 @ 2.44.10

⁶² 16 Mar 2022 @ 2.55.10

⁶³ [24 Jan 2022 Letter from ATB p3-4](#)

indicators, development of tourism in AXA and other monthly reporting review to ensure that PM Group is performing based on the Board expectation.

- The comparison of expenses per initiatives versus the actual cannot be verified as most of the expense supports have no description of what initiatives it relates. Some were paid through credit cards and the only supports are credit card statements and do not specify what specific marketing plan it relates. There were no description of activities in the invoices/statements neither name of the Board in the description portion of the invoices/statements to ensure that the activities or expenses paid are for the Board's purposes. Most of the supports are photocopied, original invoices are not on file and there are no audit trail on the review of and approval of each invoice.

- As stipulated in the contract of the PM Group, all administrative expenses of any single item of US\$1,000 or more with the exception of airline tickets should be pre-approved by the Board; however, most of these expenses exceeding the mentioned amount were not properly approved by the Board.

63. The ATB confirmed that since the appointment of the Coordinator International Markets⁶⁴ in 2017, all overseas representative's initiatives and activities are planned with the Marketing Team. All invoices are submitted to the Coordinator International Markets who is responsible for verifying the financial submissions against planned and executed activities before signing them off and submitting them to the Accounts Team for final review and processing. The Board also appointed an Accountant in 2018.⁶⁵

64. Mrs. Liburd confirmed that detailed expenses and receipts are still outstanding.⁶⁶

Procurement and Contract Management

65. Consideration of general contract management and the use of the Procurement Board by the ATB has been made under point (b) above. However, there was an additional matter to which we would wish to draw attention and that is in relation to a specific example of unapproved use of the ATB subvention for capital expenditure.

Capital Expenditure – The St Maarten's Dock Project

66. The ATB Board saw it fit to construct a ferry terminal in Dutch St. Maarten (SXM-AXA Ferry Terminal) to provide a less congestive mode of transporting passengers to Anguilla. The processing of the Ferry terminal was started without any official approval. However, in late 2011, the official approval was received with final construction in 2012. Although this seems highly unusual, no special funds were allocated for the ports construction.

⁶⁴ [24 Jan 2022 Letter from ATB](#)

⁶⁵ [24 Jan 2022 Letter from ATB p4-5](#)

⁶⁶ 13 Apr 2022 @ 4.27.20

67. Post construction of the ferry terminal, the auditor identified a 10% increase in the subvention for 2013 to cover outlays incurred from the SXM-AXA Ferry Terminal. However, Former PS, Tourism stated that expense of the port should have been borne by the ATB without any additional monies to the subvention.
68. Both Mrs Liburd and Mr Herbert shared the SXM-AXA Ferry Terminal is under new management but no official meeting with the ATB Board was carried out at the time of publishing this report.

Conclusion – It was noted an official line of communication, proper budgetary guidelines and initial approvals should have been a prerequisite for the construction of a port of such magnitude. Based on the information received the significance of the SXM-AXA Ferry Terminal was realized however the manner in which it was processed fell outside of normal budgetary guidance which cause ad-hock decisions to be made.

Recommendation 11 – Strategic decisions such as a ‘Ferry Terminal’ and similar matters should be channeled through the Ministry. All approvals must be received before any payments are made from the ATB’s Subvention.

Recommendation 12 – An official meeting to forward plan comprising the PS Tourism, the Ministry and the ATB should be carried out with the New Managers of the SXM-AXA Ferry Terminal before year-end 2022.

ATB Structure and Operations

69. The matter of policies and procedures for the ATB have been covered in some detail in the audit section above. However, there are a number of other matters which arose during the evidence gathering which we have chosen to comment on.

The Board – Appointment

70. We have noted that appointees to the Boards of statutory bodies are political appointments. The current process allows the Minister after consultation with the Chairman, Anguilla Hotel and Tourism Association and the President, Chamber of Commerce to appoint members to ATB Board.
71. Our view is that this political appointment process can lead to a perception that those appointed may not be the most qualified for those roles.

Recommendation 13 – That appropriate legislation be brought forward to establish an Appointments Commission for Anguilla; this body will be responsible for undertaking a merit based selection process for all statutory body board appointments; the final recommendations will be laid before the House of Anguilla Legislative Assembly for approval.

Continuity

72. With respect to the ATB, we have seen that in the period 2012 – 2021 there was a high turnover of Board Chairs; seven in the nine years 2012-2021. This is regrettable and this degree of change and uncertainty will certainly have had an adverse effect on officers.
73. More generally, we note that the role of Board Chair is usually held for two years, which we would suggest, is a relatively short period if the post holder is to become fully effective. For the ATB we can see that a number of Board Members have subsequently served as Chair and this would certainly reduce the adjusting period, nonetheless we make the following recommendation:

Recommendation 14 – That Board Chairs for all statutory bodies should serve for a period of two and a half years and be eligible for reappointment.

74. Some concerns were also raised about the handover from one post holder to another, in particular the handling of ATB records, including original copies of documents, and the management of ongoing issues, for example outstanding debts.

Recommendation 15 – Add a retention policy statement to the administrative policy for all statutory bodies setting out the principle that all records belonging to the statutory body and any records, or copies of records, held by individuals must be surrendered to the statutory body at the conclusion of any period of service with that body.

Staff Matters

75. We heard from former ATB Board Chair that on appointment in 2015, she found the ATB lacked structure, had a poor image and was not very active in the marketplace. She therefore took a more hands-on role than might be expected of a Board Chair. A report was submitted to the Ministry of Tourism by the 2015 Board when it was appointed and after this, ATB was restructured. The transition took around two years and resulted in three teams being created; Corporate Affairs, Destination Experience, and Marketing.⁶⁷
76. The ATB provided us with an organisational chart dated July 2021⁶⁸ and we can see that a similar structure appears to be in place, which should have led to a more settled workplace. Nonetheless, Mrs. Liburd reported that when she took up her post in January 2021, staff morale appeared low and one of her biggest challenges has been turning this around. We noted her comments regarding the progress which has been made and the fair assessment that there is still some work to do.

⁶⁷ 16 Mar 2022 @ 47.30

⁶⁸ Appendix 3

77. Other actions Mrs. Liburd advised of, including employee awards, team-building exercises and placing the focus on developing and challenging staff who appeared keen to engage, all appear to be positive initiatives.⁶⁹
78. Following the audit findings, there has been much consideration of the performance management of the overseas representatives. We believe that similar attention should be paid to the performance management of officers.
79. We have noted comments on a number of difficulties in the earlier part of the period under review, in particular the apparent difficulty in terminating the contract of the former Director of Tourism. We are reassured that the introduction of a more formal suite of policies will ensure that there is clarity over how such matters should be handled.

Conclusion - We conclude that an effective performance management framework, which includes planning for development with each officer, should ensure future issues are identified and addressed at an early stage.

Communications and division of responsibilities between Ministries of Tourism, Finance and ATB

80. In evidence, we heard about a number of issues where we felt that there is a lack of communication between the ATB and the Ministries of Tourism and Finance. We sensed that, on occasion, a clearer understanding of where each entity's responsibilities lay may have prevented issues arising.
81. Examples of this include a Ministry of Tourism contract with the Britto Agency which the ATB appeared to be paying for. There is an unresolved matter regarding an apparent overpayment connected to this. The Britto Agency contacted us during the period of this inquiry. Best practice prevents a scrutiny committee becoming involved with individual cases and so we suggested they contact the Ministry directly to resolve this.
82. Another example which gave us cause for concern is the process in place for the appointment of the Director. Responsibility for this lies with the Minister but thereafter the ATB Board is responsible for management of the post holder.

Conclusion: We understand that any Ministry would wish to be involved in the appointment of the Director, or equivalent post, on a statutory body but would respectfully suggest that the Board should also be involved in order to contribute to the decision to appoint a post holder they will be responsible for; accordingly, we recommend: include some form of consultation with the ATB and Minister regarding the appointment of the director.

83. Mrs. Liburd told us that the working relationship with the ATB Board and the Ministry of Tourism is currently very good with regular structured reporting and meetings. She

⁶⁹ 13 Apr 2022 @1.57.10

commented on the support and encouragement received from the ATB Board members whom she described as ‘very engaged’ with communications by group chat and email in addition to meetings.⁷⁰

Conclusion – We conclude that there has been a significant amount of progress in building constructive working relationships between the ATB and the Ministry of Tourism which, along with oversight from the Ministry of Finance, should significantly reduce the risk of future issues relating to division of responsibilities or accountability.

Future Funding and Value for Money

84. We have been greatly encouraged by the progress made by the ATB since the 2017 audit report; there are numerous examples of positive changes and resolved issues and we are positive about the future of the ATB. We were particularly pleased to see a copy of the 2022 – 2023 Anguilla Tourist Board Destination Experience & Marketing Performance Indicators.⁷¹ We have reflected on what the next steps may be for the ATB.

85. In evidence, Mrs. Liburd set out the practical sales and marketing experience, both strategic and operational, which made her suitable for the role of Director.⁷² She also touched on prior experience of monitoring and evaluation and it is this, which we would like to encourage her and the team to really focus on now. In order to demonstrate that the ATB is adding value, it is necessary to fully understand and report on whether their initiatives and the events they engage in or support are adding value; how they are translating into ‘heads in beds.’ We believe this is more than simply counting activity as indicated in the Performance Indicators;⁷³ there needs to be an understanding of how much value particular activities add.

86. We heard a number of comments about the sufficiency of the ATB subvention given the importance of the tourist industry to the economy of Anguilla. When asked, Mrs. Liburd indicated that her aspiration was to demonstrate the ATB can responsibly spend the budget and to show the potential for what could be delivered with any budget increase in order to make the case for more.⁷⁴

Conclusion - We think an increase in budget ought to be granted when there is transparency, and as a result increased visibility, and analysis of spending. While we have not been prescriptive in our recommendation below, we would encourage consideration of an external and independent monitoring evaluation function.

Recommendation 16 – The ATB Board should consider publishing a breakdown of the costs associated with attending off island events, financial support for Anguillian events

⁷⁰ 13 Apr 2022 @2.05.10

⁷¹ Appendix 4

⁷² 13 Apr 2022 @2.01.45

⁷³ Appendix 5

⁷⁴ 13 Apr 2022 @ 3.59.50

and business support, and promotional activities alongside any post event reports; this can be done 6-12 months in arrears if commercial confidentiality is a factor.

Recommendation 17 – The ATB should have a dedicated monitoring and evaluation function to calculate the economic value for money of their work and monies provided to promotional activities on island; results should be reported annually to the Ministries of Tourism and Finance.

Appendix 1

January 24th , 2022

Mrs. Cora Richardson-Hodge
Chairman
Anguilla Public Accounts Committee
The Valley
Anguilla

Dear Mrs. Richardson-Hodge,

Re: Response To Public Accounts Committee’s Letter of Inquiry

The Anguilla Tourist Board (ATB) wishes to confirm receipt of your letter of inquiry. We have attached the Anguilla Tourist Board’s most recent organisational chart as requested and the accounts team has attached the unaudited accounts for the period 2018 to 2021.

Additionally, the ATB has detailed below the progress made towards addressing a number of the issues raised by the Auditor in the “Bases for Disclaimer of Opinion on Regularity” found on pages 4-6 subsections a) – i) of the 2017 Report. In general, the ATB has made considerable progress over the past 4 years to remedy many of the issues outlined in the audit report. The Board and operations team are committed to strengthening the ATB’s financial policies and accountability mechanisms to ensure that the organisation operates at the highest financial standards. We have responded below in red to each issue raised in the 2017 Audit Report.

- a) We were not provided with any evidence of approval by the Board of Directors, appropriate minister, Minister of Finance as well as approval by the House of Assembly on the Board estimates of its recurrent revenue, expenditure and capital. The approved budget should have been used as a benchmark in order for the us to make appropriate checks as we consider necessary to enable us to form an opinion in accordance with Section 52 of the Financial Administration and Audit Act.

Since the latter part of 2017, the operations team of the ATB has made a concerted effort to seek board approval of the estimates of its recurrent revenue, expenditure and capital. In 2017, the board restructured the operations team in such a way that it would develop 3 distinct units (Corporate Affairs, Marketing & Destination Experience) that would later strengthen and improve the process of preparing budgetary estimates for submission to the board. In 2018 the ATB shifted its approach to budgeting by allowing each unit to develop extensive plans for the upcoming year and assign appropriate budgetary estimates and key performance indicators to those plans.

- b) The Board doesn't have written procurement policies to be used as a benchmark in entering into contractual agreements and appointing agents to represent the Board. These policies are needed and should have been used as a benchmark in order for us to properly make checks as we consider necessary to enable us to form an opinion in accordance with Section 52 of the Financial Administration and Audit Act.

The ATB as a statutory body now falls under the Anguilla Public Procurement and Contract Administration Act, 2011 and will therefore be guided by the procurement policies outlined in the referenced act. The ATB currently does not have the updated legislation in its possession but we have requested the same from the Ministry of Tourism.

- c) No reports or documentation exist on the various overseas marketing representatives' performance during the year before renewing their contract for the auditor to review. There were no set of guidelines to determine whether these representatives are performing based on the Board's and Anguilla's expectations.

In 2017 as part of the ATB's restructuring, the Board made provisions for a Coordinator International Markets (Job description is attached as Exhibit 1). This position was envisaged to provide overseas representatives with greater oversight, more direction and a more intimate reporting structure within the ATB. Since 2018, all overseas representatives are required to submit monthly reports that outline their in market activities and achievements each month. One of the shortcomings of the ATB has always been its lack of expertise in the area of setting key performance indicators, bench marks and evaluating return on investment in the overseas markets. Therefore, it was thought that a Chief Marketing Officer role would be valuable in helping the ATB to achieve such. The role was advertised on 2 occasions but in both instances the Ministry of Finance advised against filling the role due to the island's less than ideal financial position in the wake of Hurricane Irma. In 2021, the Board once again advertised the position and successfully appointed the Chief Marketing Officer in April 2021. The Chief Marketing Officer is now tasked with setting guidelines and evaluating the performance of all overseas representatives (Job description is attached as Exhibit 2).

- d) There were no reporting and review of the following as stipulated in the contracts of each marketing representatives:
- status of marketing activities;
 - the benchmarking with the monthly planned initiatives versus the actual;
 - the monthly ROI and KPI's and documentation of the effect of the marketing activities to the tourism industry of the island

As a result, we cannot corroborate the expenses recorded in general to the planned initiatives of each of the representatives.

The Marketing team receives monthly reports on the activities and performance of all overseas representatives. Weekly meetings are held with overseas representatives to ensure that they stay on target with assigned responsibilities and projects. The Chief Marketing Officer is now in place to assess monthly

ROI and KPI's. Attached as Exhibit 3 & 4 are copies of the North American Market's most recent monthly report for your review.

- e) The Board does not have written policies on international travel and subsistence. We have not received approved budgets for each international travel to make sure that expenses incurred are valid and within the approved limits.

In 2021, a draft International Travel & Subsistence Policy was developed for the ATB. The Policy is currently being reviewed for submission to the board. A copy of the draft policy is attached as Exhibit 5. Additionally, the ATB's international travel budget is approved by the board each year through the established budgetary estimates process that the team under takes. The Board also approves staff travel to marketing events, activities and other tourism related travel throughout the year.

- g) The Board does not have written policies over the capitalization of purchases on supplies, furniture and equipment used in trade shows and exhibits. The Board's policy is to immediately recognize these as expenses upon purchase and not accounted nor recorded properly for monitoring and future usage.

The ATB is currently in the research phase of this policy and the accounts team will prioritise the same for 2022.

- f) The Board does not have written policies on transportation allowance, per diem, meal allowance, accommodation, etc. per type of individual visiting the Island for its hosting expenses. We have not received approved budgets for each hosting expense to make sure that expenses incurred are valid and within the approved limits.

A Hosting Policy for the Anguilla Tourist Board is currently being written and a first draft is expected to be available by March 2022. Per Diem, meal allowances and accommodation has been addressed in the draft International Travel & Subsistence policy and will help to form the basis for on island hosting as well.

- h) The Board does not have policies over sub-contracted services made by overseas representatives. Per Anguilla Tourist Board Act, section 24, the Board has the power to enter into contracts and appoint agents to represent the Board outside Anguilla and to carry out such other functions as may be assigned to them by the Board in writing. In that case, the overseas representatives are under the power and supervision of the Board and thus, all contracts or sub-contracts entered into by the representatives on behalf of the Board should be pre-approved and authorized by the Board before engaging the services. For the year 2017 PM Group in USA contracted Live Communication, Cision and PR Newswire while UK representative contracted White Tiger for its public relations activities without approved contractual arrangements. Due to the absence of contract, the Board does not have benchmarks or basis of the amounts paid to various sub-contracted companies other than to rely on the information submitted by its representatives.

There is still no policy regarding sub-contracted services but the contracts issued to overseas representatives in 2019 gave overseas representatives the ability to subcontract services with the approval of the Board. Listed below is the exact excerpt from the standard overseas representatives' contracts that speaks to

subcontracting. Additionally, a copy of the ATB's contract with its North American Representatives are attached as Exhibit 6.

ii) The Contractor may subcontract the performance of any aspect of the Scope of Services with the written approval of the ATB.

- i) The Portfolio Management Group is the Board marketing representative for the United States of America and Canada during the year with a total budget of EC\$1,745,000. The following are matters that hinder us from forming an opinion in accordance with Section 52 of the Financial Administration and Audit Act with regards to the PM Group:
- The marketing initiatives were general in nature and no guidelines on how the budget will be spent. Also, no review made or any assessment of the key performance indicators, development of tourism in AXA and other monthly reporting review to ensure that PM Group is performing based on the Board expectation.

The ATB now receives monthly reports from the Portfolio Marketing Group. The Chief Marketing Officer and Coordinator International Markets are tasked reviewing and assessing the key performance indicators assigned to the Portfolio Marketing Group.

- i) The Portfolio Management Group (*continued*)
- The comparison of expenses per initiatives versus the actual cannot be verified as most of the expense supports have no description of what initiatives it relates. Some were paid through credit cards and the only supports are credit card statements and do not specify what specific marketing plan it relates. There were no description of activities in the invoices/statements neither name of the Board in the description portion of the invoices/statements to ensure that the activities or expenses paid are for the Board's purposes. Most of the supports are photocopied, original invoices are not on file and there are no audit trail on the review of and approval of each invoice.
 - As stipulated in the contract of the PM Group, all administrative expenses of any single item of US\$1,000 or more with the exception of airline tickets should be pre-approved by the Board; however, most of these expenses exceeding the mentioned amount were not properly approved by the Board.

With the appointment of the Coordinator International Markets in 2017 the reporting and verifying systems have drastically changed at the ATB. The overseas representatives are no longer allowed to submit invoices and documentation to the Accounts Team. All initiatives and activities are planned with the Marketing Team, all invoices are submitted to the Coordinator International Markets who is responsible for verifying the financial submissions against planned and executed activities. Once satisfied with the validity of the submissions, the Coordinator International Markets signs off on the invoices and submits them to the Accounts Team for final review and processing. This additional layer in the process helps the ATB to ensure that all invoices are related to the work of Anguilla. Additionally, the Board appointed an Accountant in

2018 to help strengthen the Accounts team's ability to adequately verify, monitor and process all finance related submissions.

The contracts issued to the overseas representatives in 2019 no longer limit their spending by a specific amount but rather it calls for spending based on the guidelines outlined in the section of the contract below.

vii) The Contractor will execute activities that target each market segment (Romance, Adventure, Events & Culture, Culinary, Health & Wellness), focusing on the three (3) accommodation sectors; [hotels/resorts, villas and mid-market properties] and in accordance with the Anguilla Tourist Board Marketing & Business Development Plan.

Viii) These services shall be carried out in accordance with the Scope of Services;

AND

In accordance with the budgetary guidelines established by the ATB.

In addition to what has been outlined above the operations team has developed an internal Accounting Policies and Procedures policy to guide general accounting procedures for the entire organisation. The operations team is currently awaiting board review and approval of the document. It is attached as Exhibit 7. Additionally, in 2020 the board started the process of developing Bylaws for the ATB. These are envisaged to add additional support and guidelines to the Anguilla Tourist Board Act. The Bylaws are currently awaiting Board approval. The document is attached as Exhibit 8.

The Board and operations team remain committed to improving its general operations and we look forward to receiving any technical support from the Public Accounts Committee that will assist the ATB in responding to the issues outlined in the 2017 Audit.

Respectfully yours,



Shellya Rogers-Webster
Deputy Director of Tourism
Anguilla Tourist Board

INTEROFFICE MEMORANDUM

TO: Kenroy Herbert
Chairman, The Anguilla Tourist Board

FROM: Stacey Liburd

SUBJECT: Usage of the ATB Credit Card

DATE: October 18, 2021

Chairman below is an outline surrounding the events of my usage of the ATB credit card on Saturday August 28, 2021.

August 28, 2021 – On Saturday August 28, 2021, at around 6:45pm, I went to the Louis Vuitton store at the Riverside Square Mall in Hackensack, NJ to make a purchase. Upon check-out my NCBA debit card was declined. I messaged Deputy Director Shellya Rogers-Webster to inform her of the issue I was having and ask that she message Ms. Marissa Gumbs at NCBA to investigate the issue. Ms. Gumbs confirmed that she was in receipt of the request and will work on the issue but was not sure how long it would take. After waiting approximately 30/40 minutes, I called Mr. Herbert and explained the issue I was having and asked permission to use the ATB credit card and assured him that I would reimburse ASAP. The Chairman approved usage and stressed that funds must be reimbursed ASAP. When I got to my parents' home at approximately 8:15pm, I was advised by the Deputy Director that my credit card was ok for usage as per Ms. Gumbs at NCBA. The issue was that there was a spending limit placed by myself on the card when I opened the account, and the purchase exceeded that limit. The limit was increased but I had already left the store.

August 29, 2021 – On Sunday August 29, 2021, at 12:09pm I sent an email to Gershwin Lake, Accountant for the ATB, as follows (attached hereto as exhibit A):

“Gershwin, good morning and happy Sunday. I hope all is well. Can you please send me the ATB’s NCBA US account number and details? My personal NCBA card was giving some issues yesterday and with the permission of the Chairman, I used my ATB credit card. I want to transfer

those funds and reimburse the ATB immediately. Thank you for your urgent attention to this request.”

August 30, 2021 – On Monday August 30, 2021, at 8:28am Mr. Lake responded as follows (attached hereto as exhibit A):

“Dear Mrs. Liburd, hope all is well. Our USD account # is [REDACTED]. I understand your concern but if you are going to incur charges you may want to wait until you come. Let me know if this helps. Thanks.”

August 30, 2021 – On Monday August 30, 2021, at 8:47am I responded as follows (attached hereto as exhibit A):

“Hi Gershwin, good morning. I hope you had a great weekend. Thank you so much for your quick turnaround of this request. Please note that the transfer was made, and I have attached confirmation of same. Please check our account and confirm receipt on your end. Let me know if you need anything from me for our records for audit purposes. I appreciate your concern and kindness however the issue was resolved, and my card is now ok to use. I am flying back tomorrow and after quarantine, I should be in office next Monday. Looking forward to seeing you all soon. Until then, have a great week.

Receipt of transfer attached hereto at exhibit B.

EXHIBIT A

contain privileged, confidential information which is exempt from disclosure under applicable laws. If you are not the intended recipient, please note that you are strictly prohibited from disseminating or distributing this information (other than to the intended recipient) or copying this information. If you have received this communication in error, please notify me immediately by e-mail at Stacey.liburd@atb.ai. Thank you.

Please consider the environment before printing this e-mail.

From: "Gershwin A. Lake" <Gershwin.Lake@atb.ai>
Date: Monday, 30 August 2021 at 08:28
To: "Stacey A. Liburd" <Stacey.Liburd@atb.ai>
Cc: "Kenroy M. Herbert" <Kenroy.Herbert@atb.ai>
Subject: RE: ATB Acct. Number

Dear Mrs. Liburd

Hope all is well. Our USD account # is [REDACTED] charges you may want to wait until you come.

I understand your concern but if you are going to incur

Let me know if this helps

Thanks

From: Stacey A. Liburd <Stacey.Liburd@atb.ai>
Sent: Sunday, August 29, 2021 12:09 PM
To: Gershwin A. Lake <Gershwin.Lake@atb.ai>
Cc: Kenroy M. Herbert <Kenroy.Herbert@atb.ai>
Subject: ATB Acct. Number

Gershwin,

Good morning and happy Sunday. I hope all is well. Can you please send me the ATB's NCBA US account number and details? My personal NCBA card was giving some issues yesterday and with the permission of the Chairman, I used my ATB credit card. I want to transfer those funds and reimburse the ATB immediately.

Thank you for your urgent attention to this request.

Warmest regards,

Mrs. Stacey Liburd, BS, C. Dir | Director of Tourism
Anguilla Tourist Board

P.O. Box 1388 | Coronation Avenue | The Valley, Anguilla, AI-2640

T: [\(264\) 497-2759](tel:(264) 497-2759) | C: [\(264\) 584-2768](tel:(264) 584-2768) | F: [\(264\) 497-2710](tel:(264) 497-2710)

stacey.liburd@atb.ai | www.ivisitanguilla.com

Monday, October 18, 2021 at 10:45:35 Atlantic Standard Time

Subject: Re: ATB Acct. Number
Date: Monday, 30 August 2021 at 08:47:17 Atlantic Standard Time
From: Stacey A. Liburd
To: Gershwin A. Lake
CC: Kenroy M. Herbert, Shellya K. Webster
Attachments: image001.png, image002.jpg, ATB Reimbursement.pdf

Hi Gershwin, good morning. I hope you had a great weekend.

Thank you so much for your quick turnaround of this request. Please note that the transfer was made and I have attached confirmation of same. Please check our account and confirm receipt on your end. Let me know if you need anything from me for our records for audit purposes.

I appreciate your concern and kindness however the issue was resolved and my card is now ok for use.

I am flying back tomorrow and after quarantine, I should be in office next Monday. Looking forward to seeing you all soon. Until then, have a great week.

Warmest regards,

Stacey Liburd
Director of Tourism | Anguilla Tourist Board

ASSISTANT: Ms. Simonia William
Simonia.william@atb.ai

P.O. Box 1388 | Coronation Avenue | The Valley, Anguilla, AI-2640
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british caribbean



Facebook: [Facebook.com/AnguillaOfficial](https://www.facebook.com/AnguillaOfficial)
Twitter: @Anguilla-Trsm
Instagram: Anguilla_Tourism

Disclaimer: This message is intended only for the individual or entity to which it is addressed. It may

EXHIBIT B



- Accounts ▾
- Transfers ▾
- Between my Accounts
- To Third Party Account
- Loan Repayment
- Transfer Templates
- Bill Payment ▾
- Information ▾

Alpha Online Retail Transfers Transfer result

Transfer Between my Accounts

Please confirm your transfer details

Your transfer result

Transfer successfully completed

From

To

Amount

Transfer Description

Transfer date

Reference

Message To Recipient

Personal info redacted
Personal info redacted

3,571.94 USD

Reimbursement from DOT

2021/08/30 08:33:49

Info redacted

Garshwin as per my email -
this is the reimbursement
discussed

IN THE DESCRIPTION BOX ABOVE PLEASE PROVIDE A BRIEF EXPLANATION TO SUPPORT THE REASON FOR THE TRANSFER

Print

Back

Message

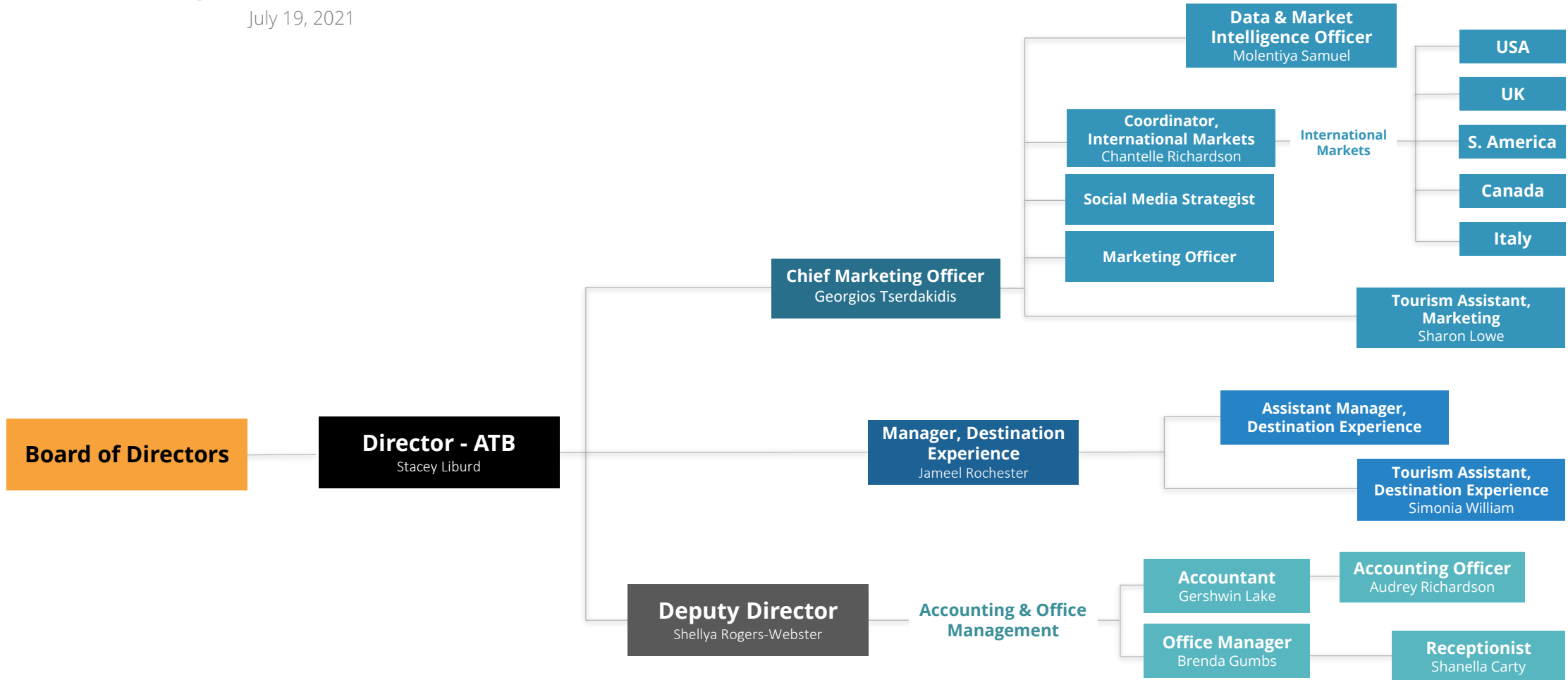
Received messages

A TEAM FOCUSED ON YOUR
SUCCESS, WE ARE THE
PEOPLE'S BANK
NCBA
COMMITTED
&
LEADING THE WAY.



Organisational Chart

July 19, 2021



Anguilla Tourist Board: Overseas Representation Framework

Anguilla Tourist Board
Georgios Tserdakidis
Chief Marketing Officer
August 2021

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Table of Contents

1. Executive Summary
2. The Purpose of Overseas Representation & Core Responsibilities
3. Organisational Chart: International Marketing
4. Overseas Team Structure and Core Responsibilities
5. Scope of Work of ATB Overseas Representation
6. Retainer Fee Summary

1. Executive Summary

Overseas Representation
Anguilla Tourist Board

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Executive Summary

The Anguilla Tourist Board works with its expanding network of overseas representation agencies along with the Anguilla tourism industry partners, stakeholders, tour operators and receptive wholesalers as well as media and brand partners to support numerous trade and media activities, including trade shows, sales and media missions, marketing partnerships, training initiatives, and familiarization visits.

Due to the absence of clear guidelines and performance benchmarks for overseas representation offices in the past, the current Anguilla Tourist Board leadership is committed to provide country-specific scopes of work that will guide the day-to-day work and key performance indicators (KPI's) of each of ATB's overseas office representation.

Executive Summary

The ATB's existing overseas representations are located in the following cities/countries:

- New York, USA
- Toronto, Canada
- London, United Kingdom
- Milan, Italy
- Sao Paulo, Brazil (for Latin American countries Brazil, Argentina, Colombia and Chile)

2. The Purpose of Overseas Representation & Core Responsibilities

Overseas Representation
Anguilla Tourist Board

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The Purpose of Overseas Representation



The main purpose of overseas representation is connecting Anguilla domestic partners with international audiences. The Anguilla Tourist Board Overseas Representation facilitates opportunities to:

- Interact with and virtually explore Anguilla's destinations
- Connect directly with Anguilla stakeholders
- Schedule B2B meetings
- Participate in education sessions about Anguilla and its diverse offerings, products and services
- Participate in enrichment sessions that provide marketing insights
- Access itineraries and marketing collateral

Core Responsibilities

Travel Industry Relations

Outreach and training to trade segments (consortia, online travel agencies, product managers)

Outreach and training to trade segments

Target Group Market and Incentive Industry

Compile regular **EDM newsletter** updates (access to agency database)

Specific liaison to **airline and cruise partners**

Roll out **trade training webinar** program (enabling cost effective outreach across regions)

Review participation in specific **travel shows** (B2B trade events/B2C consumer events)

Monitoring and Reporting (reporting on media and sales initiatives and consumer sentiment)

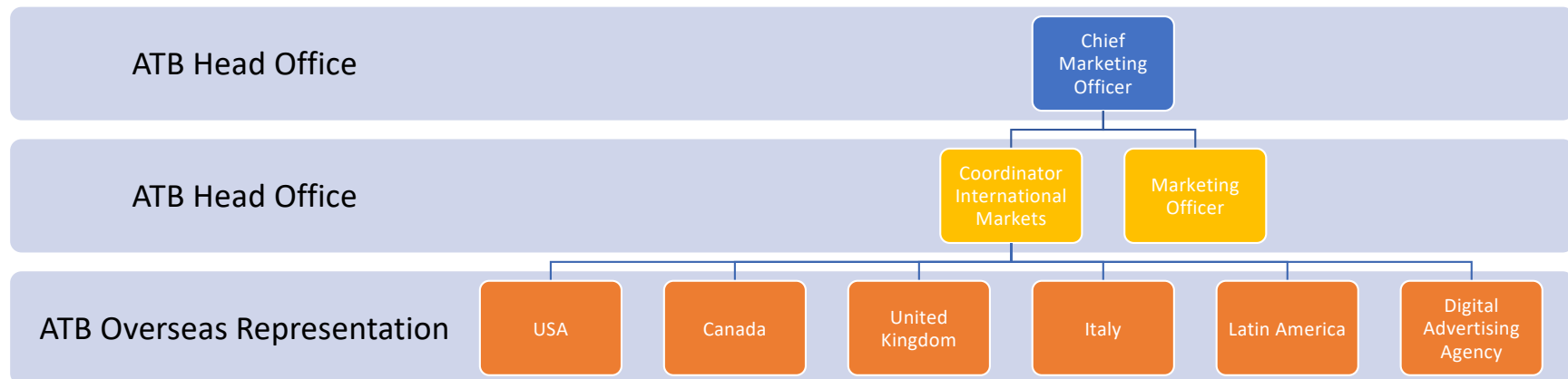
Respond to **local market** enquiries (trade, media and consumer community management)

3. Organisational Chart: International Marketing

Overseas Representation
Anguilla Tourist Board

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Organisational Chart



4. Overseas Team Structure & Core Responsibilities

Overseas Representation
Anguilla Tourist Board

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Team Structure: USA Office



Team Member	Title	Resource Allocation
Noel Mignott	ATB Country Director	15%
Alison Ross	PR & Media Director	65%
Lorine Charles St. Jules	Travel Trade Director	100%
Jacqueline Vickers	Administration & Travel Trade Support Director	100%

Travel & Tourism Industry Clients:
Anguilla Tourist Board, Antigua and Barbuda Tourism Authority, Grand Bahama, Marrycarribean.com, Nevis Tourism Authority, Saint Martin Tourism Bureau, South African Tourism

Core Responsibilities: USA Office

Identify travel trade and PR opportunities in the US market

Meet prospects and present Anguilla sales and marketing opportunities

Assist in the onboarding process to become an Anguilla sales and marketing partner

Share Anguilla industry stakeholder contacts and destination sales information

Develop creative marketing & communication strategies for PR, sales promotions, advertising, branding and co-branding initiatives

Organize sales calls and media desksides, attend roadshows, trade and consumer shows, exhibitions, seminars and other in-market events

B2B & B2C Collateral distribution

Develop creative market-specific PR, Travel Trade and Consumer Initiatives

Team Structure: Canada Office



Team Member	Title	Resource Allocation
Barbara Jesson	ATB Country Director	18%
Nancy Drolet	Travel Trade Director	25%
Nicola Blazier	PR & Media Director	25%

Travel & Tourism Industry Clients:

Anguilla Tourist Board, Saint Martin Tourism Bureau, Cuba Tourist Board of Canada, Los Cabos Tourist Board, Japan National Tourism Organisation

Core Responsibilities: Canada Office



Identify travel trade and PR opportunities in the Canadian market

Meet prospects and present Anguilla sales and marketing opportunities

Assist in the onboarding process to become an Anguilla sales and marketing partner

Share Anguilla industry stakeholder contacts and destination sales information

Develop creative marketing & communication strategies for PR, sales promotions, advertising, branding and co-branding initiatives

Organize sales calls and media desksides, attend roadshows, trade and consumer shows, exhibitions, seminars and other in-market events

B2B & B2C Collateral distribution

Develop creative market-specific PR, Travel Trade and Consumer Initiatives

Team Structure: United Kingdom Office



Team Member	Title	Resource Allocation
Carolyn Brown	ATB Country Director	100%
Laura Marfell-Williams	PR & Media Director	50%
Anita Clements	PR Manager	40%
Cat Hamilton	PR Manager	10%

Travel & Tourism Industry Clients:
Anguilla Tourist Board, Anguilla Tourist Board, The Midcounties Co-operative, New Smyrna Beach Area Visitors Bureau, Kennedy Space Center Visitor Complex, Gane and Marshall (TO), Blue Bay Travel (TO)

Core Responsibilities: United Kingdom Office



Identify travel trade and PR opportunities in the UK market

Meet prospects and present Anguilla sales and marketing opportunities

Assist in the onboarding process to become an Anguilla sales and marketing partner

Share Anguilla industry stakeholder contacts and destination sales information

Develop creative marketing & communication strategies for PR, sales promotions, advertising, branding and co-branding initiatives

Organize sales calls and media desksides, attend roadshows, trade and consumer shows, exhibitions, seminars and other in-market events

B2B & B2C Collateral distribution

Develop creative market-specific PR, Travel Trade and Consumer Initiatives

Team Structure: Italy Office



Team Member	Title	Resource Allocation
Stefano De Paoli	ATB Country Director	50%
Tiziana Gennari	PR & Travel Trade Director	80%
Ilaria Crepaldi	PR & Travel Trade Manager	20%
Dedicated Intern	PR & Travel Trade Associate	100%
Travel & Tourism Industry Clients: Anguilla Tourist Board, Invest Hong Kong		

Core Responsibilities: Italy Office

Identify travel trade and PR opportunities in the Italian market

Meet prospects and present Anguilla sales and marketing opportunities

Assist in the onboarding process to become an Anguilla sales and marketing partner

Share Anguilla industry stakeholder contacts and destination sales information

Develop creative marketing & communication strategies for PR, sales promotions, advertising, branding and co-branding initiatives

Organize sales calls and media desksides, attend roadshows, trade and consumer shows, exhibitions, seminars and other in-market events

B2B & B2C Collateral distribution

Develop creative market-specific PR, Travel Trade and Consumer Initiatives

Team Structure: Latin America Office



Team Member	Title	Resource Allocation
Danielle Clouzet	ATB Country Director	20%
Natalia Venturini	Travel Trade Director	25%
Osmar Maduro	PR & Media Director	25%
Leonardo Neves	PR & Media Manager Brazil	35%
Neto Fernandes	Travel Trade Manager Brazil	50%
Diego Gantiva	PR & Media Manager LATAM	30%
Aydee Suarez	Travel Trade Manager LATAM	25%

Travel & Tourism Industry Clients:

Anguilla Tourist Board, Delta Air Lines, Selina Hotels, IPW US Travel Association, NYC & Company, Kayak, Inprotur (DMO), WTM Latin America, GEA Brasil (TA Network)

Core Responsibilities: Latin America Office



Identify travel trade and PR opportunities in the Latin American market

Meet prospects and present Anguilla sales and marketing opportunities

Assist in the onboarding process to become an Anguilla sales and marketing partner

Share Anguilla industry stakeholder contacts and destination sales information

Develop creative marketing & communication strategies for PR, sales promotions, advertising, branding and co-branding initiatives

Organize sales calls and media desksides, attend roadshows, trade and consumer shows, exhibitions, seminars and other in-market events

B2B & B2C Collateral distribution

Develop creative market-specific PR, Travel Trade and Consumer Initiatives

Team Structure: Digital Advertising Agency



Team Member	Title Resource Allocation
Steve Defontes	ATB Digital Team Lead
Grace Capuzzo	Content Lead
London Mercer	Social Media Lead
Pablo Pedro	Digital and Website Lead
Joseph Carelli	Social Media Strategist

Travel & Tourism Industry Clients:
Anguilla Tourist Board, St. Maarten Tourism Bureau, Antigua and Barbuda, Wingate Inn, Hotel Indigo,
Hale and Hearty, Hayes Magazine

Core Responsibilities: Digital Advertising Agency



Identify advertising, branding and social media opportunities in the digital arena

Creative development for ATB marketing and advertising

Media planning, buying and negotiating with media entities

Curate content for digital channels and traditional channels

Create, curate and manage social media activities and communities on relevant social channels

Optimize website performance, design and content continuously

Enhance mobile web design and user experience

Create Email Newsletter design for domestic and international outreach

5. Scope of Work

Overseas Representation
Anguilla Tourist Board

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Scope of Work

The current Anguilla Tourist Board leadership is committed to provide a country-specific Scope of Work as part of the contractual agreement that will guide the day-to-day work and key performance indicators (KPI's) of each of ATB's overseas office representation.

The blueprint for the scope of work can be found in Chapter 6 of this document. Moreover, the blueprint Scope of Work will be (1) an integral part of the individual contracts for representation services and (2) amended on a country-by-country level depending on market size and marketing investment.

Scope of Work

1. General Responsibilities
2. Owned Marketing Channels
3. Communications/Public Relations
4. Travel Trade
5. Account Administration
6. Additional Policies

1. General Responsibilities

Overseas Representatives are considered Anguilla Tourist Board's in-market experts, with the purpose of keeping top-of-mind awareness for Anguilla as a premier travel destination in this market thereby increasing travel to and spend in Anguilla.

- As an extension of the Anguilla Tourist Board staff in market, overseas representation will continue to act as brand managers and ensure that all marketing and communications activity represents the Anguilla Tourist Board brand.
- Provide input into planning and execution of all elements of co-op campaigns, owned channel management – social media channels, e-marketing, travel trade and public relations to ensure campaigns are cohesive and integrated across all disciplines (as appropriate for our target audience in market) therefore maximizing the impact of all programs.
- Ensure team is fully trained on the use of tools provided by Anguilla Tourist Board, including but not limited to digital website, digital asset management, brand standards, roadshow and trade/consumer shows microsite/online invitation system, brochure/online analysis, database management, etc.
- Work with Anguilla Tourist Board Chief Marketing Officer and Marketing Team in advance regarding all promotional product needs.
- Program reporting needs to conclude within 15 days of program completion.
- All program related working and final files need to be sent to Anguilla Tourist Board within 15 days of execution.

2. Owned Marketing Channels

Strategy

- Provide staff resources, per approved staffing allocation, to work with Anguilla Tourist Board HQ staff and content agency partner to develop and execute market specific owned channel strategy.
- Monitor Anguilla Tourist Board market specific owned channels – website, social media, email, publications – and provide feedback on necessary local nuances.
- Participate in global owned channel/content meetings as required.
- Participate in development of global editorial calendar.
- Provide input to market specific advertising offerings and work with Anguilla Tourist Board HQ staff and content partner to facilitate introductions to in-market partners interested in advertising on market-specific owned channels.

2. Owned Marketing Channels

Website

- Support localization and on-going maintenance of market specific iteration of ivisitanguilla.com as directed.
- Coordinate adding, updating, and localization/translation of new content as directed by content team and editorial calendar.
- Work with Anguilla Tourist Board HQ staff to localize the website linking strategy to provide relevant content links for consumers.
- Work with Anguilla Tourist Board content team to source, review and post relevant, in-market curated content (ATB will help facilitate content discovery).

2. Owned Marketing Channels

Social Media

- Support localization and on-going maintenance of market specific social channels as directed.
- Provide monthly social media email reports to Anguilla Tourist Board.
- Support Anguilla Tourist Board HQ team with paid social program including making recommendations for paid posts, reviewing translated paid post copy and identifying in-market activity that could warrant paid post support.
- Create market specific content and serve as a critical point in the escalation path for issues identified by in-market community management team.
- Participate in regularly scheduled meetings to review analytics and program insights/optimization recommendations with content agency and global social partner.

2. Owned Marketing Channels

Email Newsletter

- Work with Anguilla Tourist Board Marketing Team and agency to execute in-market consumer e-mail program as directed.
- Participate in regularly scheduled email strategy meetings to provide input on market specific nuances to global strategy.
- Provide input to market specific email calendar, with particular focus on in- market programs that warrant single subject email exposure (i.e. large trade co-ops or in-market activations).
- Review content for all consumer email activity.

2. Owned Marketing Channels

Publications

- Work with Anguilla Tourist Board Marketing Team and their content agency on market specific printed and digital collateral (includes, but not limited to visitor's guide, maps, brochures and communicated messaging). Activity to include input to localize story/content list, editing, translation and review.
- Keep detailed accounting of distribution of publications and provide quarterly reporting. At a minimum, reports should include current inventory, quantity distributed, audience (trade, consumer, etc.).
- Distribute publications on request and at events and trade shows as applicable.

3. Communications/Public Relations

Strategy

- Develop and implement a PR strategy that is reflective of global PR priorities and that will generate earned media coverage and promotional exposure on consumer, news and trade media channels across all platforms.
- Develop new and creative approaches to secure publicity and promotional opportunities. These can include both endemic and non-endemic partners.
- Stay abreast of current media, travel and lifestyle trends and apply knowledge to shape pitches and targeted PR tactics.
- Develop and maintain progressive Digital Influencer/Content Creator strategy. Identify and engage with digital influencers named as top targets in 21/22 PR plan and establish metrics for reporting success, reach and value of digital influencer programs.

3. Communications/Public Relations



Strategy (continued)

- Secure a minimum of one (1) major broadcast opportunity to generate mass reach exposure for Anguilla Tourist Board and featured industry partners.
- Develop earned media tactics to leverage consumer advertising and social media activity as well as Anguilla Tourist Board owned content assets such as new video series and other owned and developed video content.
- Work with Anguilla Tourist Board HQ on crisis communication outreach as needed and inform Anguilla Tourist Board HQ of coverage and sentiment in regional media. Additionally, inform Anguilla Tourist Board HQ of any localized crises that could have a negative impact on outbound travel.
- Inform Marketing Team and Social Media Agency of sharable results and quality content resulting from PR activity in a timely manner, to include notifications when Media Reps/Digital Influencers are coming to Anguilla for real time shares and engagement on Anguilla Tourist Board channels.

3. Communications/Public Relations

Press Trips & PR Programs

- Proactively secure and coordinate a minimum of four (4)* individual press trips annually for top tier travel journalists with commitments to produce editorial coverage based on experiences showcased through itinerary.
- Coordinate and escort a minimum of one (1)* group press trip annually, if applicable for market, working directly with Anguilla Tourist Board HQ staff and, Anguilla industry partners/stakeholders to build itineraries.
- Identify and develop experiences for Digital Influencers and create appropriate content creation opportunities and programs, and facilitate inclusion in FAM experiences.

3. Communications/Public Relations



Press Trips & PR Programs (continued)

- Integrate social media into all press visits. At minimum, include social media details (handles and hash tags) for hosting partners on itinerary. When possible/relevant, supply media with Anguilla Tourist Board MiFi.
- Plan, organize and produce media components and outreach for roadshows, trade and consumer shows, events, press conferences, PR activations and/or other in-market media activities, if applicable.
- Supply Anguilla Tourist Board HQ, industry partners and stakeholders with talking points and media profiles for in-market media activities.
- Plan and organize editorial/media visits in-market as needed for Anguilla Tourist Board HQ staff.

3. Communications/Public Relations



Media Content & Pitching

- Proactively pitch Anguilla story ideas and news to in-market media and secure placements of Anguilla stories in targeted media outlets.
- Connect with a minimum of 10* key media per month to pitch Anguilla stories (via phone, email, virtual or in person events or meetings) to keep Anguilla top-of- mind and disseminate key messages and product news.
- Localize media content supplied by Anguilla Tourist Board HQ for timely media distribution. Content can include press releases, story ideas, What's New product news items and listicles.
- Maintain Anguilla media kit with story ideas.
- Fulfil press material requests including press kits, images, b-roll and other related content.
- Distribute regularly scheduled media newsletter to key media throughout the market. q
- Generate and deliver qualified media leads to Anguilla industry partners.

3. Communications/Public Relations

Reporting & Administration

- Maintain an updated database of key targeted lifestyle, trade and news media including print, online, radio, broadcast and digital influencers and freelance writers. Collected data is property of Anguilla Tourist Board.
- Provide monthly PR activity highlights in monthly country report and on monthly status calls.
- Enter clipping results data to the PR report on a regular basis. Tagging must include industry stakeholders highlighted in coverage as well as source of coverage.
- Distribute coverage results in a timely manner via email to industry partners who supported press trips and/or are featured. Copy CMO and Marketing Team on emails. Provide analysis metrics as well as top line summary of coverage when not in English.
- Provide detailed analysis of digital influencer coverage and programs.
- Provide annual PR Year in Review summary including highlights of proactive activity and key PR programs and total coverage generated from activities (number of placements, ad value and impressions/audience) by December 1.
- Evaluate publicity generated in past year by Anguilla Tourist Board and identify target media for the new fiscal year as part of marketing work plans.

4. Travel Trade

Strategy

- Develop and implement an innovative sales and trade marketing strategy targeted toward developing new and expanding current Anguilla product and niche market segments.
- Create engagement through highly targeted tactics like familiarization trips and community generating activities (in-market networking opportunities, sales blitz, seminars, educational sessions, and other engagements if appropriate).
- Support travel trade campaigns with financial investment, content and owned channel amplification.
- Develop one (1)* trade, airline or tour operator-focused campaign that may include Anguilla industry partner/stakeholder participation through buy-in opportunities.

4. Travel Trade

Strategy (continued)

- Keep travel trade audiences up-to-date on Anguilla’s marketing strategy and tactics through a variety of communication channels.
- Produce annual or bi-annual trade platforms (roadshows/sales missions/trade shows) to connect industry partners with senior personnel of wholesalers, tour operators, travel agencies, airlines and other key players in target markets.
- Provide Anguilla Tourist Board quarterly updates to market-specific brochure analysis (including, but not limited to brochures, online, or other) identifying product “gaps” and making recommendations for new itineraries and areas of focus for product development.
- Provide annual Travel Trade Year in Review summary including highlights of proactive activity and key trade programs to include reach, ROI, audience by December 1.

4. Travel Trade

Trade Engagement

- Organize and lead Anguilla in-market roadshows/sales missions and tradeshow as agreed upon by the Anguilla Tourist Board, and provide full time travel trade staffing for the program where applicable.
- Represent Anguilla at selected travel trade shows and events to be determined by the Anguilla Tourist Board.
- Coordinate partnerships with travel trade that provide call to action for our brand advertising (where applicable).
- Develop and distribute regularly scheduled monthly/quarterly travel trade newsletter to key travel trade if applicable.

4. Travel Trade

Trade Engagement (continued)

- Work with airlines on new route development into Anguilla and provide support of new route launches in country and in Anguilla.
- Maintain relationships with industry partners, airlines, tour operators, travel agencies, promotional partners, online booking partners and other travel trade entities.
- Develop, promote and support appropriate key airline, tour operator, travel agent sponsored familiarization tours and promotional efforts.
- Connect with and pitch sales and product development efforts to a minimum of eight (8)* travel trade per month.
- Maintain relationships with in market agencies such as Caribbean Tourism Organisation (CTO), Anguilla Hotel & Tourism Association (AHTA), and other affiliates as appropriate.

4. Travel Trade

Training

- Grow travel agent community utilizing Anguilla Tourist Board training tools and create incentive platform for travel agents to stay abreast of Anguilla tourism product.
- Execute and maintain localized information on Anguilla Tourist Board's trade engagement platform and conduct educational seminars and/or webinars with travel trade. Increase training engagement rate by 10% YOY.
- Organize and escort a minimum of one (1)* Anguilla Tourist Board initiated group familiarization trips annually to Anguilla targeting travel trade product managers and/or travel agents.

4. Travel Trade

Reporting & Administration

- Provide monthly trade activity highlights in monthly country report and on status calls.
- Provide annual Trade Year in Review summary including highlights of proactive activity and key trade programs by December 1.
 - Including: number of FAMs, participants and stakeholders involved; quantity of trade touch-point; top-line summary of Year over Year brochure analysis as related to our programs' impact on product development; number of training sessions/trade webinars conducted; top line summary of Sales Mission/Trade Show: number of Industry/Delegate participation, trade guests or attendees, number of 1 on 1 meetings, number of agents trained, and top line summary of VIP event if included; number of Tour Operator and Travel Agency visits conducted).

4. Travel Trade

Reporting & Administration (continued)

- Manage and update content for sales mission or tradeshow microsites (including, but not limited to event details, delegate zone, required submissions, deadlines, or other).
- Maintain an updated database of key trade partners within market, tour operators, agents, and wholesalers. Collected data is property of the Anguilla Tourist Board.
- Generate and distribute qualified leads to Anguilla industry partners with a cc to Marketing Team.
- Provide online and collateral tools for planning assistance to all segments of the travel trade.

4. Travel Trade

Research

- Provide timely and regular analysis of market and regional trends with emphasis on potential programmatic implications in monthly reports.
- Time sensitive developments, such as new airlift or important competitor/market developments, should be shared with Director of Tourism/CMO in a timely manner.
- Use both Anguilla Tourist Board-sourced research as well as complementary in-market research in building annual work plan and strategy.

5. Account Administration

Account Administration

- For any programs with a budget amount over \$500, supply the Anguilla Tourist Board a project brief detailing program elements, goals, potential ROI, how it will be measured, program investment, dates and deadlines, for review and approval by CMO and/or Marketing Team prior to commitment to the program.
- Program reporting needs to be concluded within 15 days of program completion with final files need to be sent to head office.
- Maintain a dedicated business phone/fax/e-mail, website contact for trade and press inquiries about Anguilla and be able to disseminate appropriate information expediently.
- Ensure that any staff member representing or presenting information on Anguilla related product is appropriately trained and knowledgeable of said product.

5. Account Administration

Account Administration (continued)

- If the country director, PR or Travel Trade Director, PR or Travel Trade Manager, content lead or any other key staff person is replaced with a new staff member during the fiscal year, it is the contractor's sole execution and financial responsibility to ensure adequate training and product knowledge. The replacement staff person must be adequately trained within 60 days to ensure successful contract continuity.
- Any costs associated with training the replacement staff person are the responsibility of the contractor, including but not limited to, in country travel and travel to Anguilla Tourist Board headquarters.
- Country director, travel trade director/manager, public relations director/manager, content lead and any staff dedicating at least 50% of their time to Anguilla Tourist Board must make a minimum of one Anguilla trip each year to meet with the Anguilla Tourist Board staff and to ensure their knowledge of the Anguilla product is up to date.
- Key staff person(s), as directed by Anguilla Tourist Board, to attend ATB Marketing Conference in Anguilla annually.

5. Account Administration

Account Administration (continued)

- Appropriate staff to participate in integrated market planning meetings via virtual call .
- Appropriate staff to participate in regularly schedule Brand Market/All agency calls (1-2x/month), Internal working groups status meetings (1-2x/month) and international status calls (every 3-4 weeks) depending on market need.
- Provide monthly report, with inclusion of Anguilla Tourist Board required content, by the 5th of the succeeding month in which the activities were performed. The report must be e-mailed.
- Provide market coordinator monthly budget reconciliations, by the 10th of each month.
- Provide top-line reports indicating the state of the industry, Anguilla's position in the market, and issues that could adversely or positively affect the destination's strategic position as requested by Anguilla Tourist Board.

5. Account Administration

Account Administration (continued)

- Provide immediate information on significant trade industry developments to country director (e.g. company closures, mergers, competitive action, and new or expanded routes/service frequency) affecting the contractors represented markets.
- Provide content team with regular updates of the international section on the B2B web site, if requested.
- Fulfill image/video requests from the trade industry and the media.
- Maintain an adequate supply of press materials on behalf of Anguilla Tourist Board; storage and distribution costs are to be absorbed within the operating costs of the contract.
- CMO agency visits: Hold a minimum of 1 in-market meeting annually with in-market representation of Anguilla destinations and hotels where all Anguilla related product representatives convene and are briefed on Anguilla Tourist Board plans and programs.
- Complete and participate in quarterly international office performance evaluations.

5. Account Administration

Costs covered by representation fees

- All travel within country of contractor's offices designated in contract for Anguilla Tourist Board.
- In-office storage of collateral and promotional materials.
- Postage to send materials to travel trade.
- Telephone, fax, computers, Internet, phones, all cell phones charges (in- market and while traveling outside of home country) and other office equipment.
- Office supplies.
- Professional or in-house clipping service.
- All staffing/administration costs related to fulfilling the contract.

5. Account Administration

Proposed Pre-Payment of Program Expense

- Anguilla Tourist Board will pre-pay up to 50% to the estimate program costs for programs over \$5,000 USD.
- Contractor is required to submit an invoice for 50% of the estimated program cost along with a program brief, and detailed program budget.
- After completion of program, contractor can bill for the remaining expense.
- A detailed budget reconciliation and all appropriate receipts must be included with invoice for final billing of program that include 100% of charges incurred for program.
- Prior written authorization by Anguilla Tourist Board Director of Tourism/Chief Marketing Officer required for program execution.

6. Additional Policies

Policies	Research	Outline Development	Policy Writing	Policy Consultation and Review	Policy Implementation
Procurement Policy	Based on GOA Timeline	Based on GOA Timeline	Based on GOA Timeline	Based on GOA Timeline	Based on GOA Timeline
International & Regional Travel and Subsistence Policy	August 30 th	September 24 th	October 31 st	November 15 th	December 1 st
Standard Operating Procedures for the Accounting Team	August 15 th	September 8 th	September 30 th	October 15 th	November 1 st
Entertainment and Hosting Policy	September 24 th	October 15 th	November 15 th	November 30 th	December 1 st

**Anguilla Tourist Board
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Chief Marketing Officer**

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Anguilla, British West Indies

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ANGUILLA TOURIST BOARD | DESTINATION EXPERIENCE & MARKETING

PERFORMANCE INDICATORS

KEY STRATEGIES FOR 2022

- To develop a strong digital marketing strategy to ensure a strong competitive brand in the marketplace.
- To develop and maintain a modern and practical destination website.
- To support the initiatives of the international media through the provision of PR content, dynamic imagery and videography to raise the profile of the destination.
- To create awareness of the destination through marketing, partnerships, travel trade programmes/Co-op Marketing (Digital, Social, print, television & general broadcast)
- To establish and maintain working relationships with all stakeholders (public & private sector partners as well as advertising, public relations and promotion agencies locally, regionally and internationally).
- To represent Anguilla at in-market events & shows (Roadshows, trade and Consumer shows, dinner presentations, seminars and exhibitions)
- To coordinate and execute direct sales initiatives to the Travel Trade and consumers.
- To enhance the elements of the visitor experience (accommodations, transportation, entertainment, restaurants, and activities) to adequately reflect our positioning / brand as a luxury destination.
- To focus on quality control and benchmarking, by training and developing minimum regulatory industry standards and guidelines for all tourism related stakeholders.
- To create programmes to encourage new tourism business development and existing business enhancement (upgrades).
- To work with local stakeholders to develop, package & market authentic Anguillian experiences.
- To use our experience mapping tools to develop strategies and recommendations to strengthen our guests' on island experience.
- To use communication tools to measure guest satisfaction.
- To support local activities and projects that contribute to authentic local experiences.
- To promote and maintain an awareness of tourism and its importance to Anguilla's economy.

· To work with different ministries to develop tourism related policies to enhance the tourism product offerings, tourism related revenue collection and compliance, minimum industry standards, ensuring that our on island experiences are consistent with the ATB's Marketing initiatives.

To support access development- direct & through major hubs.

To conduct a needs assessment survey for the entire tourism industry.

- Increase awareness of the Anguilla Tourist Board and its services using an intergrated PR strategy (social media, print, radio & events)
- To create and support local marketing activities that will help to raise the profile of the Anguilla Tourist Board.
- To enhance the capacity of the ATB to adequately execute its mandate.

PERFORMANCE INDICATORS	2022 Estimates	2022 Targets	2023 Targets
Output Indicators			
Tourism Awareness Projects			
· Number of school tourism awareness projects / Campaigns	12	17	17
· Number of activities for school year	2	4	4
· Number of tourism action clubs	3	7	7
· Number of meetings days per month	1	1	1
· Number of tourism competitions	2	4	4
· Number of young people attending conference	2	5	5
Research			
· Number of data collection initiatives	5	10	15
· Experience Management Surveys	100	200	250
· On going data analysis	12	12	12
Industry Based Training			
· Number of Sessions; Accommodations	3	3	3
· Number of Sessions; Attractions	3	3	3
· Number of Sessions; Restaurants	3	3	3

· Number of Sessions; Activities	3	3	3
· Number of Sessions; Tourist Guides	3	3	3
· Number of Sessions; Transportation	3	3	3
· Number of Sessions; Retail	3	3	3
· Number of Sessions: Government Departments	4	4	4
· Number of people targeted per session	30	30	30

Events and Festivals

· Number of Festivals (receiving technical and financial support)	5	10	10
· Number of Events (receiving technical and financial support)	10	15	15

Enhancement Projects

· Number of Eco Tourism Projects	2	5	5
· Number of Sports Tourism Projects	8	15	20
· Number of On-Island Promotion Projects	2	4	4
· Number of Epicurean Projects	1	2	3
· Number of Historical and Preservation Projects	2	4	5
· Number of Development & Promotion Projects	5	8	10
· Number of MICE Projects	1	3	5
· Number of Planned On-Island Experience Projects	20	40	50

Cruise Sector and Tours

· Number of Cruise Related Activities and Events	20	35	45
· Number of Packaged Tours	40	60	100
· Number of Packaged Experiences	40	60	100

Website