



Office of the
Senate Ethics Officer
Bureau du
conseiller sénatorial
en éthique

GUIDELINE ON SPONSORED TRAVEL

(Section 18 of the *Ethics and Conflict of Interest Code for Senators*)

(Last revised May 2026)

I. Introduction

Senators are sometimes asked to attend events or visit places as public officials and have their travel costs paid by others. The Code allows senators and their guests to accept an offer of sponsored travel that “arises from or relates to the Senator’s position” (s 18(1)).

The purpose of this guideline is to assist senators and others understand when sponsored travel is acceptable under the Code. It also provides some information about other rules and principles of the Code that can sometimes arise in the context of sponsored travel.

This Guideline is merely advisory. It presents some common scenarios and provides some preliminary answers to sample questions. But senators sometimes face unique factual circumstances or contexts that require different answers. Accordingly, compliance with this Guideline does not necessarily equate with compliance with the Code, or with other rules or laws that may apply in the circumstances. On the other hand, failure to follow the Guideline does not necessarily amount to a breach of the Code. In case of any

doubt, senators are encouraged to contact the Senate Ethics Officer for an opinion or advice.

II. What is the rule?

The general rule is that a senator may accept travel costs paid by a third party if the travel arises from or relates to the senator's position.

Sponsored travel is an exception to the general prohibition against senators accepting a gift or benefit that could reasonably be considered to relate to their position as senators (s 17; see Guideline on Gifts and Other Benefits (Section 17)).

Sponsored travel can be international travel or travel within Canada. The Code does not distinguish between travel sponsored by a for-profit and a not-for-profit organization.

III. To whom does the rule apply?

The rule applies to senators and the guests of senators, such as family or staff members. However, it excludes other third parties. The rule applies only if the senator takes part in the trip.

IV. What is the purpose of the rule?

The rule recognizes that it is sometimes important for senators to travel for purposes of carrying out their public duties, and that they are often invited to do so by third parties. Accordingly, senators may accept invitations to travel at another person's or entity's expense when it enables them to discharge their senatorial responsibilities.

Senators must note, however, that even when sponsored travel is permissible, the other provisions of the Code continue to apply. For example, senators must continue to give precedence to their parliamentary functions over any other duty or activity (s 2(1)). They must avoid conflicts of interest, not use their influence to further private interests, and not share confidential information (ss 2(2)(c), 8, 9, 10). They may also have to declare a private interest if the interests of the sponsoring person or entity are affected by a matter before the Senate or in a committee of which the senator is a member (s 12(1)). In turn, for at least a year thereafter, they may have to recuse themselves from debate on the matter and refrain from voting on it (but may abstain) (ss 13, 14).

Because of these ancillary issues, sometimes the better course is to decline an invitation of sponsored travel where there is a serious risk of engaging or breaching other provisions of the Code.

V. What does it mean in section 18 when it says, “arises from or relates to the senator’s position”?

Sponsored travel is acceptable under section 18 only if senators are travelling in their capacity as public officials and are performing a function as a public official during the trip, for example, by giving a speech, taking part in a panel discussion on a public issue, or visiting a foreign country to discuss issues of mutual interest with officials from that country.

Therefore, a senator who travels at the expense of a third party but does not perform an official function during the trip will not meet the criteria of the sponsored travel rule; rather, the general prohibition against receiving gifts and other benefits may apply (s 17).

VI. What other principles and rules arise in the context of sponsored travel?

It is important that senators keep in mind that the principles and rules of conduct in the Code apply even where the sponsored travel is permitted. For example, they may find themselves in a situation during the trip where they could be perceived to be furthering their private interests or improperly furthering someone else's private interests (contrary to ss 8 and 9). This could occur, for example, if the senator became involved in discussions about a company of which the senator is a director or about a sector of the economy in which the senator has a financial interest. It is important to remember that senators have an overarching duty to arrange their private affairs to prevent foreseeable real or apparent conflicts of interest from arising and to resolve any conflicts in a way that protects the public interest (s 2(2)(c)).

Senators sometimes become privy to confidential information that could have an impact on their or someone's else's private interests because of their work in the Senate. Senators are not permitted to use, or attempt to use, information that is not generally available to the public to further their own or their family members' private interests, or to improperly further another's private interests. Therefore, it would be prudent for senators involved in sponsored travel to avoid discussions in which they may inadvertently use or disclose information that is not publicly available in a way that furthers their or someone else's private interests.

Accordingly, there may be situations where it is inadvisable for a senator to accept an invitation of sponsored travel because it may pose a serious risk of breaching a rule of conduct in the Code.

The Senate Ethics Officer can give advice only on the interpretation of the Code. However, other rules and laws may also apply, such as the *Lobbyists' Code of Conduct* or the *Criminal Code*. Where other restrictions could apply, senators may need to check the rules relating to lobbying with the Commissioner of Lobbying or seek information from the Office of the Law Clerk and Parliamentary Counsel.

VII. How do senators know if they may accept sponsored travel?

Senators should inform themselves about the details of the trip and consider some of the factors that may affect whether to accept the invitation:

- Find out who is paying for the trip. The organization paying for the trip might be different from the sponsor of the trip.
- Consider the purpose of the trip. Is it clear why the senator was invited?
- Consider whether there are any matters currently before the Senate or a committee of the Senate, or before the House of Commons (which could end up before the Senate), that could affect the sponsor. Similarly, consider whether the sponsor currently has business or commercial dealings with the federal government or a provincial, territorial or municipal government. If so, accepting sponsored travel may result in the need to declare a private interest under sections 12 to 16 of the Code.
- If the sponsor offers to pay an honorarium in addition to the travel costs, the honorarium may amount to a gift or benefit that is not acceptable under the Code (See Guideline on Gifts and Other Benefits (s 17)).

- Take account of the duration of the trip. Is it limited to business, or does it also include leisure? Could the trip be viewed as more of a leisure trip than a business trip? If so, accepting the invitation may raise questions about whether the senator is actually performing a function as a public official during the trip.
- Consider whether the trip could be perceived as an attempt to influence the senator in their senatorial duties, whether at the present time or in the foreseeable future. If so, questions about a real or perceived conflict of interest could arise.

While considering these factors may provide some indication of whether the trip is acceptable sponsored travel, there may be other relevant questions that should be asked. Senators are encouraged to contact the Senate Ethics Officer to seek advice before accepting an invitation.

VIII. Examples of acceptable and unacceptable sponsored travel

- (i) Can a senator accept sponsored travel from a not-for-profit organization that has invited the senator to give the keynote address at the event in the senator's official capacity?

Yes. If the senator is performing an official role at the event, the senator may accept the invitation.

- (ii) Can a senator accept travel paid for by a parliamentary association that is funded by the Joint Interparliamentary Council?

Yes. The senator may accept the invitation and need not report it to the Senate Ethics Officer. Travel that is paid by a parliamentary association funded by Parliament is exempt from the reporting requirements (s 18(1)).

- (iii) Can a senator accept sponsored travel from a university that is hosting a conference and invites the senator to participate because of their background in the area?

This situation would not come within the rule on sponsored travel (or the rule on gifts or other benefits) because the invitation arises from the senator's background, not their position as a senator. However, other rules and laws may apply. The senator would be advised to check the rules relating to lobbying with the Commissioner of Lobbying or contact the Office of the Law Clerk and Parliamentary Counsel for information.

- (iv) May a senator accept an invitation of sponsored travel from an organization to visit a vacation destination, both for the senator and their spouse?

No. In their official capacity, a senator cannot accept a trip whose primary purpose is leisure. To be permitted under the Code, the sponsored travel must relate to the senator's role as a public official. They must be carrying out an official function during the trip. Sponsored travel that is essentially a paid vacation or holiday cannot be accepted.

- (v) Can a senator accept an offer of sponsored travel to attend a one-day conference at which the senator is the keynote speaker? The senator would like to stay for two extra days to sightsee.

Yes. The senator may accept the invitation of sponsored travel to participate at the conference. However, the senator must pay for their own accommodation and expenses for the extra two days given that the purpose of the extension is personal in nature.

- (vi) Can a senator accept an invitation from a foreign government for a paid trip to that country to meet with its leaders and discuss bilateral relations and trade?

Yes. This is permissible under the Code since the sponsored travel arises from the senator's position and the senator would be attending in their capacity as a public official.

- (vii) Can a senator and their staff members accept an offer of sponsored travel to attend a conference to which the senator is invited to give a speech on the role of the Senate in Canadian democracy? Would the answer be the same if the senator simply attending the conference and not speaking?

Yes. The senator may accept the invitation of sponsored travel because they would be carrying out an official function at the conference as a guest speaker. Sponsored travel is acceptable only if the senator has an official role to play (giving a speech, inaugurating a facility, or introducing a distinguished performer), or if the senator was invited in their representational capacity – for example, as a distinguished guest representing the community, region, or province. This would include the senator's guests, whether staff or family

members. However, if the senator does not play an official role at the conference, the senator must decline the invitation.

- (viii) Can an organization pay the travel and accommodation costs of a senator's staff member to attend a conference related to the staff member's work in the senator's office if the senator is not part of the travel?

The Code does not apply to staff members. It applies only to senators. As such, any conflict-of-interest issues that relate to senators' staff should be addressed to the Senate Administration, not the Senate Ethics Officer.

- (ix) What should senators do if they accept permissible sponsored travel?

If the sponsored travel rule applies and the costs of a senator or any guest of the senator exceed \$500, the senator must file a Statement of Sponsored Travel with the Senate Ethics Officer within 30 days after the end of the trip. This form can be found on the Office of the Senate Ethics Officer's website. Click [here](#).

In the statement, the senator is required to disclose who is paying for the trip, the destination, the purpose and length of the trip, whether any guest was also sponsored, and the general nature of the benefits received (s 18(2)). The general nature of the benefits includes airline tickets, rental cars and other modes of transportation, meals, hotels and other types of accommodation, and other expenses.

The Senate Ethics Officer will post the statement on the Public Registry, which can be found on the Office of the Senate Ethics Officer's website.

Sponsored travel does not need to also be disclosed as a gift or other benefit (s 18(3)).

(x) [Are there any exceptions to filing a Statement of Sponsored Travel?](#)

A senator need not file a Statement of Sponsored Travel if the travel is paid for through the programs for international and interparliamentary affairs of the Parliament of Canada. Nor is it required if the travel is paid for by the Senate, the Government of Canada, or by the senator's political party, even if the cost of the travel exceeds \$500.

Travel with a Senate committee, a Joint committee of the Senate and of the House of Commons, or any organization that is funded by the Joint Interparliamentary Council – for example, a parliamentary association such as the Canadian Group of the Inter-Parliamentary Union (IPU) or the Canadian NATO Parliamentary Association – does not require the filing of a Statement of Sponsored Travel because it is funded by one or both Houses of Parliament.

However, a senator must file a Statement of Sponsored Travel with the Senate Ethics Officer for travel that is paid by any of the friendship groups¹ where the funds for the travel derive from outside sources. A statement must also be filed if a senator is travelling as part of one of the four interparliamentary groups² that are recognized by Parliament if the travel is sponsored by an outside source.

IX. What should senators do if they are unsure about whether to accept an offer of sponsored travel?

In case of any doubt, senators are strongly encouraged to seek advice in advance of their travel, rather than face potential issues after the trip has already taken place. Senators should contact the Office of the Senate Ethics Officer for advice at 613-947-3566 or by e-mail at cse-seo@sen.parl.gc.ca.

X. Related guidelines

[Guideline on Gifts and Other Benefits \(Section 17\)](#)

[Guideline on Outside Activities \(Section 5\)](#)

¹ See Directive 2024-01, Friendship Groups (section 5 and paragraphs 28(1)(c) and 31(1)(c)), Standing Committee on Ethics and Conflict of Interest for Senators, July 8, 2024.

² The four interparliamentary groups recognized by Parliament are: Canada-Germany Interparliamentary Group; Canada-Ireland Interparliamentary Group; Canada-Israel Interparliamentary Group; and Canada-Italy Interparliamentary Group.