

Invicta Public Affairs: Operating Protocol

As commercial public affairs consultants, a core element of Invicta's service provision to clients is political, community and media engagement. Our client base consists of commercial organisations seeking help to navigate the regulatory or public policy landscape. Invicta chooses not to work with public sector bodies in order to avoid potential conflicts of interest.

We recognise that our work is often high profile and can be sensitive. This means effective engagement is vital in enabling appropriate and successful outcomes, both for clients and decision makers. It is therefore imperative that our working practice is conducted in a fair and ethical manner at all times, as set out herein.

OUR PRINCIPLES

Invicta is founded on the principles of **openness, honesty and integrity**. All aspects of our operating protocol ascribe to these core values.

When engaging with elected representatives, members of the community and the media, we are:

1. **Open about who we represent, where we are from and why we are meeting.** We engage in a consistent and diplomatic manner with the aim of conveying our clients' message. This is done in an even-handed manner which avoids excluding any relevant party from participation.
2. **Accurate about our clients' proposals.** Invicta only provides factual information on behalf of clients, which we ensure has been approved by a senior company representative. This information is always presented in as straight-forward a style as possible, in an honest manner and in good faith.
3. **Transparent and even-handed about how we conduct our business.** It is essential that our engagement procedures are clear and can stand up to scrutiny, particularly as many of the issues we assist clients with can be high profile or publicly sensitive. We ensure transparency in everything we do.

OUR TEAM

No staff members of Invicta Public Affairs are permitted to hold elected political or appointed public office. We do employ the services of external consultants on an ad hoc basis. These consultants must adhere to the principles of their respective professional governing bodies where applicable. All Invicta staff must adhere to the professional and ethical standards set out in this Operating Protocol.

OUR METHODS

Invicta endeavours to represent our clients' reasonable commercial interests vis-à-vis:

- **Elected representatives**

We have a duty to inform elected representatives about our clients' proposals. The way in which we notify

politicians of our clients' plans strictly complies with the regulatory frameworks that exist to maintain standards in public life, such as the *Code of Conduct for Members of the Scottish Parliament*, the *Ministerial Code* and the Scottish Government's *Code of Conduct for Councillors (Nov 2007)*. We do not expect any elected representative to give a public view on our proposals and fully acknowledge that a politician will only comment if they wish to do so and are free to express their opinion. It is our policy to involve all elected representatives with a stake or interest in our plans, regardless of opinion, party or position.

- **Communities and Stakeholders**

Our engagement with communities and the public is always carried out in accordance with the aims and requirements of existing regulation on community engagement, such as the *Planning (Scotland) Act 2006*. Where appropriate, we also follow the Government's best practice advice on community consultation in planning as laid down in PAN81 (Planning Advice Note 81 - Community Engagement - Planning with People).

- **The media**

We are consistently accurate in any materials we issue to journalists on behalf of our clients. We respect the codes of conduct which govern media broadcasts and operate fully in line with the guidelines that are set out in the *Advertising Standards Authority* and other publications.

FEEDBACK / COMPLAINTS PROCEDURE

Invicta is committed to delivering the highest standard of public affairs consultancy at all times and we would be delighted to hear any comments or feedback you might have concerning your experience when dealing with us.

Should you wish to contact us about any aspect of your experience with Invicta Public Affairs, you are invited to contact our Director using the following details:

Mark Cummings, Director, Invicta Public Affairs, 5 Coates Crescent, Edinburgh, EH3 7AL.

E-mail: mark.cummings@invictapa.co.uk

Your correspondence will be acknowledged within five working days and responded to by the Director within 20 working days.

Compliance with our core ethical values is vitally important to us. We would therefore urge you to let us know immediately if you feel that any element of our practice has been compromised.