

## CAIRNGORMS NATIONAL PARK AUTHORITY GOVERNANCE COMMITTEE

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### FOR DISCUSSION

**Title:** STAFF INTERESTS ASSURANCE PROCESS

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#### **Purpose**

This paper presents the operation of the current internal controls and assurance processes around potential staff conflicts of interests, and associated policies managing staff registration of interests and the Staff Code of Conduct.

#### **Recommendation**

**The Governance Committee is requested to:**

- a) **Review the current operation of the internal controls over managing potential staff interests and the associated assurance process;**
- b) **Consider whether the current processes require to be amended in any way and the rationale for the proposed amendments.**

#### **Executive Summary**

The Convener has been requested by some board members to consider the current operation of the current approach to managing staff interests and the potential impact on the advice and information presented to members.

This paper and its Annexes set out the current internal control framework and associated assurance processes operational in this area of the Park Authority's operations for review by the Governance Committee and consideration of whether any change is required.

As a staff policy and procedure, and substantive change will require to go through the Park Authority's standard staff consultation processes prior to implementation.

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## Internal Control System

1. The internal control systems managing the potential for personal interests of staff to impact on the development of policy, provision of advice and / or delivery of the Park Authority's operational goals and strategic objectives is established through the combination of the Staff Register of Interest Policy and the Staff Code of Conduct. These documents are presented in full at Annex 1 and 2 respectively to this paper.

## Current Assurance Framework

2. The current by the internal control arrangements set out in Annexes 1 and 2 the staff code of conduct and staff register of interest policy creates a clear and effective understanding of the responsibilities of staff to declare relevant interests. This in turn gives executive management a clear framework and understanding of any potential conflicts of interest amongst staff who may be working on a subject matter and lets us act appropriately.
3. On this basis, the assurance framework established allows the board to take assurance through executive management's operation of this system, providing for any policy advice / recommendation / operational action is free of influence from any staff conflict of interest. The board operates on the basis of Executive Management's assurance that this system is operational.

## Key Considerations

4. The internal control framework establishes mechanisms for operation within the staff group and executive management team. They are therefore entirely staff led and do not provide for wider publication of information for direct access by board members as a standard provision. This has not been deemed a requirement since the inception of this control framework, with the board satisfied with the assurance framework as established.
5. Any change to assurance requirements agreed by the committee or board which requires substantive change to existing policy and processes will require to be consulted on with the staff group and union representatives in accordance with the Park Authority's normal processes.

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