

INTERNAL AUDIT SERVICES
REPORT REF No S/019/20 (June 2019)

**Loch Lomond and the Trossachs
National Park Authority
Boat Registration Process Review**



West Dunbartonshire ~ from the banks of Loch Lomond to the shores of the Clyde



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Simon Jones, Director of Conservation and Visitor Experience, LLTNPA
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Auditor: Lucy Scott, West Dunbartonshire Council

1. EXECUTIVE SUMMARY

General

An audit was conducted on the Boat Registration Process.

The review covered the registration and the re-registration process for boats using Loch Lomond. Power driven boats, including jet skis, are required to be registered by the Loch Lomond Byelaws 2013. Over 5,000 boats and jet skis are registered annually.

The review highlighted that opportunities exist to strengthen internal controls and enhance the service provided, the most important of which are listed below;

- The registration process is currently recorded on an Access database. The process of obtaining the information required and updating the database is very time consuming and opportunities exist to improve the process by implementing a more automated registration process;
- Management should consider whether all persons registering a power driven boat should be required to provide two forms of identification and whether copies of this identification retained by the Loch Lomond and the Trossachs National Park Authority (LLTNPA). Evidence of identification may be required where contraventions are notified to the Procurator Fiscal; and
- Management should review the registration forms to identify whether all the information currently requested is required. Staff involved in the registration process should be reminded of the requirement to check the registration forms are fully completed and signed by the boat owner.

Full details of these opportunities and any other points that arose during the audit are included in the Action Plan, which forms Section 3 of this report.

2. MAIN REPORT

2.1 INTRODUCTION

2.1.1 An audit was carried out on the Boat Registration Process as part of Internal Audit's Planned Programme of Audits for 2019/20.

2.2 SCOPE AND OBJECTIVES

2.2.1 An audit launch meeting was held with Jaki Carnegie, Director of Corporate Services (left May 2019), Simon Jones, Director of Conservation and Visitor Experience, David Tollan, Ranger Team Leader, David Cameron, Ranger Team Leader and Lucy Scott, Internal Auditor.

2.2.2 The scope and objectives of the audit were agreed as being to examine whether the boat registration process is operating effectively and to highlight any opportunities identified to improve the process going forward.

2.2.3 The Boat Registration Process is driven by the Loch Lomond Byelaws 2013 which set out the requirements for registration. Work is currently being undertaken by the Ranger Team Leaders and the Legal Advisor to identify improvements to the byelaws for implementation when the byelaws are next updated. These improvements will address known issues such as:

- The requirement for trade plates for those using the Loch to demonstrate or test power driven boats; and
- Strengthening the responsibilities of owners of boats in situations where contraventions of the byelaws have occurred but the owner was not the master of the vessel.

2.2.4 The detailed work carried out as part of the audit of the Boat Registration Process included:

- The Boat Registration Process and the use of the Boat Registration Database was discussed with the Ranger Team Leader and the Boat Registration Officer;
- Discussions were held with the Ranger Team Leader, the Legal Advisor and the Governance Manager to understand the requirements of the Boat Registration Process and the Loch Lomond Byelaws 2013; and
- A sample of new boat registration forms and re registration forms submitted to the LLTNPA in person, by post and by email were reviewed to understand what information is provided and how it is recorded in the Boat Registration Database;

2.2.7 There has been no previous audit of the boat registration process.

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2.3 FINDINGS

- 2.3.1 The findings are based upon evidence obtained from review of relevant documents and discussions with those involved in the Boat Registration process.
- 2.3.2 The audit was conducted in conformance with the Public Sector Internal Audit Standards (PSIAS).
- 2.3.3 This report details all points arising during the audit review, full details of which are included in the Action plan contained within Section 3 of this report. We stress that these are the points arising via the planned programme of work and are not necessarily all of the issues that may exist.
- 2.3.4 The boat registration process was discussed with the Ranger Team Leader and the Boat Registration Officer. For a new boat registration the boat owner is required to complete a boat registration form. This form should then be taken to the LLTNPA in person with appropriate identification or sent by post or by email with copies of the relevant identification attached. The form is then printed out and the relevant information is entered to the Boat Registration Database by the Boat Registration Officer or one of the front office staff at the Duncan Mills Memorial Slipway office.
- 2.3.5 A sample of boat registration forms was reviewed. Recommendations have been made in Section 3 of this report in relation to the following issues which were noted:
- The two forms of identification, which the Registration form states are required to register a boat, are not always provided. In some instances no photographic identification is required and email applications have been processed where no identification was provided;
 - Boat owners do not always provide all information requested on the registration form and this information is not followed up by LLTNPA when they receive the form. Two instances were identified where the registration form was not signed by the owner; and
 - All the information provided by the boat owner on the registration form is not entered to the Boat Registration Database and is not collected or used by LLTNPA.
- 2.3.6 The boat re-registration process was discussed with the Ranger Team Leader and the Boat Registration Officer. Each year between 5-6,000 boats are registered for use on Loch Lomond. Annually the owner of each boat registered is sent a re-registration form by post which they are required to sign and return to LLTNPA (by post, in person or by email).
- 2.3.7 A sample of ten boat re-registration forms were reviewed. A recommendation has been made in Section 3 of this report in relation to the controls over who can re-register a boat. The sample review identified one instance where a jet ski was re-registered by someone other than the owner.

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- 2.3.8 The database used for Boat Registration was discussed with the Ranger Team Leader and the Boat Registration Officer. This database was first developed in 1995 and many 'add-ons' have been bolted on the database since this time. In addition to details of registered boats the database holds information on contraventions of the byelaws noted and details of multiple launch passes purchased. LLTNPA staff experience significant issues with the slow speed of the database on an ongoing basis. This presents a particular problem when customer information cannot be accessed in reasonable time and LLTNPA often require to make manual records (for example where a customer claims a multiple launch pass has previously been purchased) to check against the system at a later date.
- 2.3.9 The overall process for boat registration and re-registration was found to be very time consuming and manual. Significant time, paper and postage costs are incurred in the process. A recommendation has been included in Section 3 for management to consider whether an automated system could be implemented for the registration and re-registration process. It is anticipated an automated system could be substantially more efficient than the current system.
- 2.3.4 The factual accuracy of this report has been verified by the officers involved in the audit.
- 2.3.5 Audit would like to thank all staff involved in the audit process for their time and assistance.

3. Action Plan : National Park Boat Registration Process						
Ref No	Finding	Recommendation	Priority	Management Comment	Manager Responsible	Date to be completed
1.	<p><u>Boat Registration Database</u></p> <p>a) The process for registering boats and maintaining the boat registration database is time consuming and manual.</p> <p>The requirements for the database have changed significantly since it was first developed over 20 years ago and many 'add ons' have been bolted on to the database over this time. Some information, for example relating to byelaw exemptions granted, is held outside of the Boat Registration Database. Statistical information for monthly reporting is time consuming to obtain.</p> <p>All registration and reregistration forms are printed out and re-registration forms are sent out by mail every year to between 5-6,000 registered boat owners. These paper forms require to be returned to LLTNPA and are manually entered into the Access database. This incurs significant time, paper and postage costs.</p> <p>The process is likely to lead to inaccuracies in the information held in the database due to due to mistakes by boat owners when completing the forms; problems inputting to the system</p>	<p>a) Management should consider whether an automated system could be implemented which would allow, for example:</p> <ul style="list-style-type: none"> • boat owners to register their details online which would directly populate the boat registration database; • the re-registration process to be carried out on line, for example by owners confirming they continue to agree to the terms and conditions for use; and • all information to be stored electronically to eliminate the need for paper copies of registration and re registration forms to be printed and retained. <p>The full system requirements should be reviewed to ensure that any new system(s) can:</p> <ul style="list-style-type: none"> • Record contraventions, multiple launch pass purchases and all other required information; and • Provide required PI information. <p>In addition LLNTPA should</p>	Low Risk	<p>a) This recommendation is accepted.</p> <p>An internal Task and Finish Group will be set up to:</p> <ul style="list-style-type: none"> • establish scoping options and outline costs for a new online system of registration and investigate how other authorities handle similar processes e.g. Lake District and Broads NPA; • explore pros and cons of any new system in relation to potential integration of launching and enforcement data. DMS • consider timescales for development and roll out of any new online system 	Matt Buckland /Leigh Hamilton	March 2020

3. Action Plan : National Park Boat Registration Process						
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	<p>due to legibility and input errors.</p> <p>b) LLTNPA staff using the Access database experience significant issues with the slow speed of the database on an ongoing basis. This presents a particular problem when customer information cannot be accessed in a reasonable time, for example when checking whether a multiple launch pass has been purchased. The Access database is not supported by the IT team at LLTNPA.</p>	<p>consider whether the new system(s) should provide on line access to rangers whilst on patrol.</p> <p>b) Management should consider how issues with the speed of the system can be addressed going forward.</p>		<p>b) This recommendation is accepted.</p> <ul style="list-style-type: none"> • Liaise with consultant to identify potential short term improvements to database operating speed. • Longer term solution will likely require new, online system. 	Gareth Archibald/Leigh Hamilton	September 2019
2.	<p><u>Identification required to register boats</u></p> <p>The boat registration form completed to register a boat for use on Loch Lomond states that two forms of identification are required - one must be photographic e.g. passport or driving licence and the other must include the registered address.</p> <p>The following issues were identified during the review:</p> <ul style="list-style-type: none"> • Where a registration form is emailed to LLTNPA it will be processed even where no 	<p>Management should consider whether two forms of identification are always required, what forms of identification are acceptable and whether copies of the identification should be retained.</p> <p>All staff dealing with boat registration should be advised of the identification required to register a boat and the information in the registration form should be updated to reflect Management's decision on</p>	Medium Risk	<p>The recommendations are accepted.</p> <ul style="list-style-type: none"> • Legal to clarify identification requirements with the Procurator Fiscal. • Refine guidance for staff on ID requirements and roll out. 	Sandra Dalziel Sandra Dalziel/ Leigh Hamilton	October 2019

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	<p>scanned copy of identification is provided;</p> <ul style="list-style-type: none"> One form of identification is requested when registration is completed at the front desk. In most instances reviewed a driving licence was noted as being provided which provides both photo identification and confirmation of address. Where the person registering a boat has not brought photographic ID a bank card would be accepted as ID; Where the owner states they have previously registered a boat on Loch Lomond and can answer some questions about their address/the boat they are not required to provide any ID; Identification shown at time of registration is not copied by LLTNPA and the registration form states that where ID is sent by email it will be destroyed once identity has been confirmed. <p>Where insufficient identification has been provided and no copies have been retained there is a risk that the Procurator Fiscal will be unable to progress any action which LLTNPA want</p>	<p>whether a copy of the identification provided should be kept.</p> <p>Where appropriate identification has not been provided but LLTNPA deems that access to Loch Lomond should be given a process should be implemented to ensure that this is followed up and the required identification is provided within a specified time period.</p>				

3. Action Plan : National Park Boat Registration Process						
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	to take.					
3.	<p><u>Annual re-registration process</u> One re registration form, from a sample of ten reviewed, was completed by someone other than the owner.</p> <p>Despite having re-registered several other jet skis earlier the previous week the owner did not re-register this jet ski. In order to allow the master of the vessel to use the jet ski he was allowed to re-register the jet ski. The only identification provided by him was a bank card which was used to purchase a multiple launch pass. This jet ski is now re-registered for the year on the Boat Registration Database.</p>	In circumstances where the normal rules for registration or re-registration are not followed but where Management believes access to the Loch should not be denied procedures should be put in place to follow up with the owner and receive the required documents within a specified time period (in this instance the owner should be contacted and required to complete a re-registration form).	Medium Risk	<p>This recommendation is accepted.</p> <ul style="list-style-type: none"> Legal Team to review the re-registration process and provide advice for next steps. 	Sandra Dalziel	October 2019
4.	<p><u>Incomplete registration forms</u> a) Two of the new registration forms, selected as part of the sample of 13 registration forms reviewed, had not been signed by the person requesting registration. The declaration to comply with the Loch Lomond byelaws has therefore not been agreed.</p> <p>b) Whilst the registration form has a substantial number of fields which can be completed</p>	<p>a) A legal review of the declaration should be undertaken to ensure it meets LLTNPA requirements and front desk staff should be reminded of the requirement to ensure that all registration forms are correctly signed.</p> <p>b) Guidelines should be updated to clarify which fields are essential. Management should</p>	Low Risk	<p>a) This recommendation is accepted</p> <ul style="list-style-type: none"> Front desk staff to be refreshed on requirements to ensure consistent approach taken. Boat Registration Officer trains front of house staff on field requirements and carries out checks. <p>b) This recommendation is accepted.</p>	<p>Leigh Hamilton</p> <p>Leigh Hamilton</p> <p>Leigh Hamilton/ Sandra Dalziel</p>	<p>July 2019</p> <p>July 2019</p> <p>October 2019</p>

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	there is no requirement for the person registering the boat to complete them and where they are not completed further information is not always requested by LLTNPA staff. The 'front desk guidelines' state that staff should check all essential fields are filled in correctly however it is not clear what the essential fields are.	consider whether any fields are not required and remove these from the registration form.		<ul style="list-style-type: none"> Boat Team lead and Legal staff review registration form fields to ensure that byelaw wording appropriate and to ensure that we are only collecting information that we really need. 		
5.	<p><u>Information given on the registration form is not always used</u></p> <p>There are several pieces of information requested on the registration form which are not then recorded in the Access database or used in other ways by LLTNPA, this includes:</p> <ul style="list-style-type: none"> Whether the owner has previously registered vessels on Loch Lomond. Where the owner indicates they have previously registered a vessel on Loch Lomond the front desk staff do not always check whether the vessel is still owned and whether it is up to date on the database. Whether the boat is used commercially. No record is made if this is the case or 	<p>a) Guidelines for front desk staff should be amended to ensure that where owners have previously registered vessels the database is up to date with regards to whether they are still owned or have been sold.</p> <p>b) As recommended in finding 4 above, management should consider whether any fields in the registration form are not required and should be deleted.</p>	Low Risk	<p>a) This recommendation is accepted.</p> <ul style="list-style-type: none"> See action in 4 above – review of registration form and review of information collected. Roll out to front desk staff <p>b) This recommendation is accepted.</p> <ul style="list-style-type: none"> See action in 4 above – review of registration form and review of information collected. 	Matt Buckland /Leigh Hamilton	Feb 2020

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	<p>not. The re-registration form does not include any reference to commercial usage.</p> <ul style="list-style-type: none"> Where the vessel is normally launched from and the registration number of the vehicle you normally use to trail the vessel to Loch Lomond. This information is not required to be updated at annual re registration. 					
6.	<p><u>Payment for registration plates</u></p> <p>a) The registration form states that payment on line is an option for new registrations however this is contradicted by information on the LLTNPA website which states that a registration number is required prior to making an online payment. An online payment can be made without entering a boat registration number but where this is done additional work is required by the Boat Registration Officer to match the emailed registration form with the paypal payment.</p> <p>b) Since 1 April 2019 credit and debit card payment slips processed at the front desk are</p>	<p>a) Management should consider whether online payments for new registrations should be an option for boat owners and align the registration form and the website to show the same information.</p> <p>b) Management should consider, at the end of the season, whether the current process to no longer</p>	Low Risk	<p>a) This recommendation is accepted.</p> <ul style="list-style-type: none"> Registration form to be updated at end of 2019 to remove BACS details and direct customers to website for details on how to pay In order to align a payment to a vessel a registration number is required, these are not allocated until the registration process is followed therefore payment cannot be taken prior to the allocation of a registration number. <p>b) This recommendation is accepted.</p> <ul style="list-style-type: none"> Current processes to be 	<p>Matt Buckland Eilidh McKerry Leigh Hamilton</p>	<p>Feb 2020</p> <p>Feb 2020</p>

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	<p>no longer attached to the registration forms which are processed by the Boat Registration Officer. Staff at the front desk either enter payments on to the database when they are made or not payments made on the registration form.</p> <p>Since 1 April 2019, one customer has disputed the information recorded on the database. The customer claims they purchased a multiple launch pass but a note was made on the registration form that a single launch pass was purchased.</p>	<p>attach payment receipts is working effectively or whether the receipts should be attached to the registration form. It would be anticipated that any new system would incorporate sales processes and associated controls.</p>		<p>reviewed at the close of season 2019.</p>		
7.	<p><u>Transfer of vessel registration number</u> Where a boat owner sells their boat and purchases a new one they sometimes ask for the registration number to transfer from one boat to another. The byelaws state that no registration number shall be transferred to another power driven boat without the prior consent of the Authority.</p> <p>No written consent is provided but where the owner asks for a number to be transferred it is noted on the registration form.</p> <p>There is a risk that the same</p>	<p>Management should consider whether transfer of vessel registration numbers should be allowed. If it is decided this is acceptable staff involved in the registration process should be reminded of the requirement to obtain confirmation from the owner that the registration number has been removed from the original vessel.</p>	Low Risk	<p>This recommendation is accepted.</p> <p>To be reviewed when Navigation Byelaws are reviewed in 2021/22</p>	Matt Buckland	March 2022

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	registration number could be displayed on two boats if the registration number has not been removed from the old boat. This could present an issue where, for example, a contravention of the byelaws was noted.					

Appendix 1. Priority Levels

Recommendations have timescales for completion in line with the following priorities.

Priority	Expected Implementation Timescale
<u>High Risk:</u> Material observations requiring immediate action. These require to be added to the risk register of a service. (Council context)	Generally, implementation of recommendations should start immediately and be fully completed within three months of action plan being agreed.
<u>Medium Risk:</u> Significant observations requiring reasonably urgent action.	Generally, complete implementation of recommendations within six months of action plan being agreed.
<u>Low Risk:</u> Minor observations which require action to improve the efficiency, effectiveness and economy of operations or which otherwise require to be brought to the attention of senior management.	Generally, complete implementation of recommendations within twelve months of action plan being agreed.

Note: About this report

This Report has been prepared on the basis set out in the Memorandum of Understanding (MOU) between the National Park Authority as the Client and West Dunbartonshire Council (WDC) as the provider of Internal Audit services. Nothing in this report constitutes a valuation or legal advice. We have not verified the reliability or accuracy of any information obtained in the course of our work, other than in the limited circumstances set out in the MOU. This Report has been prepared for the benefit of the Client only. This Report has not been designed to be of benefit to anyone except the Client. In preparing this Report we have not taken into account the interests, needs or circumstances of anyone apart from the Client, even though we may have been aware that others might read this Report. This Report is not suitable to be relied on by any party wishing to acquire rights against WDC, other than the Client for any purpose or in any context. Any party other than the Client that obtains access to this Report or a copy (under the Freedom of Information (Scotland) Act 2002, the Environmental Information (Scotland) Regulations 2004 through the Client's Publication Scheme or otherwise) and chooses to rely on this Report (or any part of it) does so at its own risk. To the fullest extent permitted by law, WDC does not assume any responsibility and will not accept any liability in respect of this Report to any party other than the Client. In particular, and without limiting the general statement above, since we have prepared this Report for the benefit of the Client alone, this Report has not been prepared for the benefit of any other public sector body nor for any other person or organisation who might have an interest in the matters discussed in this Report, including for example those who work in the public sector or those who provide goods or services to those who operate in the public sector.