

**INTERNAL AUDIT SERVICES**  
**REPORT REF No S/020/20 (March 2020)**

**Independent Assurance Review -  
Environmental Monitoring Framework**



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



**INDEX OF CONTENTS**

Section	Contents	Page No.
1.	<b>Executive Summary</b>	<b>2</b>
2.	<b>Main Report</b>	<b>3</b>
	2.1 Introduction	3
	2.2 Scope and Objectives	3
	2.3 Findings	4
3.	<b>Action Plan</b>	<b>6</b>

**Personnel referred to in this report:**

Pete Wightman (PW) – Director of Corporate Services (LLTTNP)

Eilidh McKerry (EM) – Finance Manager (LLTTNP)

Matt Buckland (MB) - Visitor Operations Manager (LLTTNP)

Auditor: Lutfun Rahman (WDC)

## **1. EXECUTIVE SUMMARY**

### **General**

An audit was conducted on the Environmental Monitoring Framework being used to report on Your Park Project and we are pleased to report that the systems examined are generally working effectively.

The review covered:

- Reviewing procedures for the Monitoring Framework related to the Camping Management Byelaws 2017 and the associated measures of the Your Park Project;
- Reviewing the 15 Indicator questions formulated to gather data and information;
- Testing and general review of the process for data collection and information gathering. The emphasis is on the collection process undertaken by the National Park Ranger Service as part of patrolling duties;
- Reviewing of the analysis process of the data and information;
- Reviewing of the statutory reporting process.

The review highlighted the following areas of good practice:

The Environmental Monitoring and Reporting Framework has been prepared based on the Strategic Environmental Assessment (SEA) statutory document to measure the effectiveness of the Camping Management Byelaws 2017 (the Byelaws). This has been approved by the Your Park Project Board. Internal Audit reviewed this Framework and determined this to be satisfactory and incorporates areas as per the requirements of the SEA in relation to the Byelaws and wider Your Park Project.

The review also highlighted that opportunities exist to strengthen internal controls and enhance the service provided as follows:

The 15 indicator methodology documents formulated in 2018 based on the SEA statutory document to appraise Your Park are still in draft form. However, due to time constraints National Park (NP) had to pause development of these instructional questions in order to form the 15 interim conclusions that included details of the data collection and analysis methodologies.

For some of these interim conclusions the methodology is still in draft format therefore the objectives of the methodology are at risk for both the data collection and data analysis.

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 Environmental Monitoring Framework being used to report on the Your Park Project as part of Internal Audit's Planned Programme of Audits of 2019-20.

### **2.2 SCOPE AND OBJECTIVES**

2.2.1 The control objectives tested for the above in relation to transaction recording and processing were: occurrence, timeliness and regularity.

2.2.3 An audit launch meeting was held with Pete Wightman, Eilidh McKerry, and Matt Buckland.

2.2.4 The following testing was performed:

- Review the Monitoring and Reporting Framework procedures related to the Camping Management Byelaws 2017, management measures wider Your Park Project and the Strategic Environmental Assessment (SEA) statutory document;
- Review the 15 Indicator questions and associated methodology documents and Interim conclusions;
- General review of the data collection and information gathering process and detailed review of the data and information gather by the Ranger Service as part of patrolling duties;
- Review of the data analysis spreadsheet prepared from the data and information gathered by the Rangers patrolling service from March 2011 to September 2019;
- Review of the statutory reporting process;
- Hold various discussions with Matt Buckland and Sally Newton – Geographic Information System (GIS) Manager.

#### 2.3 FINDINGS

- 2.3.1 The findings are based upon evidence obtained from review of the monitoring and reporting framework, SEA statutory document, indicator questions, methodology documents, interim conclusions and other documents.
- 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 Environmental Monitoring and Reporting Framework has been prepared from the SEA statutory document to measure the effectiveness of the Camping Management Byelaws 2017 and the associated measures of the Your Park Project. This has been approved by the Your Park Project Board. This is being used to assess whether the Your Park Programme has had a positive effect on the environment and a reduction in anti-social behaviour in the Camping Management Zones (CMZ). Internal Audit reviewed this Framework and determined this to be satisfactory and incorporates areas as per the requirements of the SEA and the Byelaws and wider Your Park Project.
- 2.3.5 Audit identified that the 15 methodology documents associated with the indicator questions formulated in 2018 based on the SEA document to appraise Your Park are still in draft form. These methodology documents are instructional documents on how to answer each of the indicator questions, data collection and data analysis methodology with only 7 out of the 15 being developed furthest. However, due to time constraints NP had to pause development of these instructional questions in order to form the 15 interim conclusions. For some of these interim conclusions the methodology is still in draft format therefore the objectives of the methodology are at a risk for both the data collection and analysis.

Auditor was informed that these documents may be in draft format till 2021 due to time and staff constraints. Also the monitoring will change as some of the factors may not be monitored any longer.

- 2.3.6 For the interim conclusion 10 regarding a change in the anti-social behaviour - Crime and Incident Data report 2019, produced by Police Scotland is being used for the appraisal. It is to be noted that the data in this report relates to the whole of the National Park and not only to CMZ. The report concludes that in the first two years on the Byelaws there was increase in anti-social behaviour within the Camping Management Zones but in the year three there were significant decrease. It may however not be possible to link this directly to camping activity and the Your Park Project.
- 2.3.7 The data and information are being collected via the Rangers patrolling service for years now using Survey123 App. Data collected from March 2011

to September 2019 was statistically analysed by NP's Data Analyst. The interim conclusion documents are being developed using the information from the statistical analysis. The auditor discussed and reviewed the Spreadsheet and determined this to be satisfactory. The analysis provide vital information how various factors such as date, time, locations, weather, visitors, camping, tents, littering, number of cars, swimming, activities have had effect on the environment in the last few years. The results show that there have been positive effect.

- 2.3.8 Scottish Ministers are to be provided with a formal report of this review which is due by 31 March 2020. The format of the reporting has been suggested by the Ministers. The Audit highlighted that due to time and staffing issues NP is behind their time schedules however the auditor has been informed the deadline will be met. The auditor is not able to comment on the report as it is being drafted.
- 2.3.9 The factual accuracy of this report has been verified by the officers involved in the audit.
- 2.3.10 The Auditor would like to thank all staff involved in the audit process for their time and assistance.

### 3. Action Plan: National Park Review of Environmental Monitoring Framework S.020.20

Ref. No.	Recommendation	Priority	Management Comment	Manager Responsible	Date to be Completed	
1.	<p><b><u>Indicator questions and interim conclusions</u></b></p> <p>15 methodology documents formulated in 2018 based on the SEA statutory document to appraise Your Park are still in draft form. However, due to time constraints National Park (NP) had to pause development of these instructional questions in order to form the 15 interim conclusions.</p>	<p>a) NP management should complete the remaining indicator questions templates including methodology as soon as possible and have these formally approved by the NP Board.</p>	Medium Risk	<p>The NP Authority recognises the requirement to complete these methodology documents both for the purposes of showing a clear process and to increase business sustainability. To ensure that this process is completed in a timely fashion these documents will be completed in parallel with the 3 Year Report to Scottish Ministers. They will be approved by the newly formed Visitor Management Project Board the composes a number of Park Authority Officers including Operational Managers and Executive Team</p>	Matt Buckland	31.03.2020
		<p>b) Going forward the templates should be reviewed on a regular basis to ensure the data collection and analysis process remains up to date.</p>	Low Risk	<p>The Monitoring Framework will be reviewed and revised in 2020-21 to operate in its new guise in 2021. As part of this a review process will be incorporated into this revision.</p>	Matt Buckland	31.03.2021
2.	<p><b><u>Interim Conclusions methodology</u></b></p> <p>For some of these interim conclusions the methodology is still in draft format therefore the objectives of the methodology is at risk for both the data</p>	<p>The methodology used in the interim conclusion documents should be finalised as soon as possible.</p>	Medium Risk	<p>The NP Authority recognises the requirement to complete these interim conclusion documents both for the purposes of showing a clear process and to increase</p>	Matt Buckland	31.03.2020

**3. Action Plan: National Park Review of Environmental Monitoring Framework S.020.20**

Ref. No.		Recommendation	Priority	Management Comment	Manager Responsible	Date to be Completed
	collection and data analysis			business sustainability. To ensure these will be completed in a timely fashion in these documents will be completed in parallel with the 3 Year Report to Scottish Ministers.		



## Appendix 1. Priority Levels

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

<b>Priority</b>	<b>Expected Implementation Timescale</b>
<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.