

The LLTNPA's cover up of complaints and their implications

Description

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Frontline complaints	
Investigation complaints	
Total complaints	
Data Protection Subject Access Requests	
Environmental Information Requests / Freedom of Information Requests	
Environmental Information Requests / Freedom of Information Requests Reviews	
Total requests and reviews	
Total complaints, requests and reviews	

There has been a noticeable increase in the number received, 40 did not relate to responsibilities of the A most common subject of frontline complaints, together byelaws and camping management zones, and the c

Extract from 2016-17 Annual Report

On the surface the Loch Lomond and Trossachs National Park Authority is quite transparent about the complaints it receives, reporting on these to the Government through its Annual Report. Below the

surface, however, there is evidence to show that the LLTNPA is covering up what is really going on. In this post I will take a look at what the information in two FOI responses on complaints, one published ([see here](#)) and the other not [EIR 2018-005 Appendix B complaints](#), tells us about how the LLTNPA is responding to the issues raised by complaints.

Unanswered questions from the LLTNPA Annual Report

The LLTNPA 2016-17 Annual Report ([see here](#)) shows a very large increase in the number of complaints compared to the previous financial year. Despite the striking increase, the number of complaints which were investigated rather than being dealt with at the front line actually reduced (by 1). This means the proportion of complaints that are now being investigated is now much lower than previously. This is worthy of explanation but none is given.

While the Annual Report indicates the main reasons for people complaining, there is no analysis of the underlying issues the LLTNPA identifies (litter, toilets, the camping byelaws and the Milarrochy Bay closure) or what the LLTNPA has done to address them.

Instead the emphasis in the Annual Report is on complaints responded to within statutory timescales:

The table below shows a breakdown of the number of complaints received and responded to. The LLTNPA achieved 93% compliance with response time limits for all complaints. The LLTNPA also achieved 100% compliance in responding to requests and reviews with

One wonders if had more complaints had been investigated the LLTNPA would still have met statutory targets for response times and whether the decision of when complaints are investigated is being decided objectively?

It also strange that the LLTNPA lump complaints and information requests together (bottom line of chart) into a single total when conceptually and in terms of the legislation they are quite distinct. Wanting to know WHAT a public authority is doing is quite different to complaining about it.

All this suggests the LLTNPA's treatment of Complaints in its last Annual Report was a box ticking exercise rather than an attempt to learn and improve from the significant increase in complaints it had received.

The cover-up of complaints about the byelaws

I was amazed to find that the LLTNPA had, on the 14th November 2017, provided information about the number of complaints it had received about camping and the camping byelaws. The reason for

this is that I had previously asked the LLTNPA to share data about the operation of the camping byelaws prior to the Review Report being prepared for Ministers but, when they had claimed they were having difficulties compiling this because it was voluminous and complex, agreed to suspend my request for complaints. When I asked again for those complaints in February 2017, the LLTNPA quoted back at me ([see here](#)) that I had been:

“quite happy to suspend my request for data/information about complaints.”

Since they had already compiled the information by the 14th November, it would have taken no effort at all for the LLTNPA to share this with me and stakeholders. Instead, they decided to keep it secret and take advantage of my attempt to be helpful.

Worse, five days earlier, on the 9th of November, the Convener of the LLTNPA James Stuart had stated this in an email:

“There will also be a report to our December Board meeting, which will summarise the range of feedback, both positive and negative”

There was no summary of ANY negative feedback received about the camping byelaws in the Report for Ministers ([see here](#)). No mention that 32 complaints about the byelaws had been logged or that of these 17 had proceeded to an investigation, a far higher proportion than for other complaints. It appears that staff are completely outwith control of the Board when the Convener’s word can be overridden so easily.

After receiving the EIR response about the complaints, as a follow-up in March I wrote to James Stuart, the Convener, asking if the LLTNPA would now provide a supplementary report to Ministers about the complaints that had been received about the camping byelaws to provide a more accurate picture of what has been going on. The answer, clearly drafted by staff, was no. So its ok to provide incomplete and misleading evidence to Scottish Ministers?

EIR 2017/072 Appendix A

Type of complaint	Format of complaint	Subject of complaint
Frontline	Email	Complaint about how n
Frontline	Email	Complaint about introdu
Frontline	Email	Complaint about 'campi permit
Investigation	Email	Statement on BBC on i zones and permit booki
Frontline	Email	Camper vans parking in
Investigation	Email	Map on website not suf able to book at permit a laybys and enforcement
Frontline	Email	Signage to indicate area
Frontline	Email	Concern about requirem
Frontline	Email	Concerns about permit
Frontline	Email	Complaint about tents a
Investigation	Email	Complaint about Range area as they had no per
Investigation	Email	Management of permit a complaint about noise f
Investigation	Facebook	Litter and human waste
Investigation	Email	Litter and closure of toil
Frontline	Email	Litter at Firkin Point
Investigation	Email	Difficulties in making a c
Investigation	Email	Wild campers rubbish

Extract from log of complaints about the byelaws – full link above

The list of complaints about the camping byelaws shows a number of things. First, as one might expect, that some people are very unhappy about the camping byelaws. Second, that there have been significant concerns about how the byelaws are being implemented (which the Park failed to mention in its report to Ministers instead claiming that 85% of feedback about the permit booking system was positive). And third, that the camping byelaws have FAILED, for whatever reason to address the issues they were meant to address: human waste at Loch Venachar, litter etc etc. All this information was pertinent to the Board's evaluation of the first year of the camping byelaws but was not included in their Report to Ministers. This confirms there has been a major cover up about how the byelaws are actually working.

The wider picture – what the list of all complaints received says about the National Park

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Ref No.	Date received	Response date	date complaint closed	Time taken to resolve (working days)	Type of complaint (Frontline or investigation)	How complaint was resolved (Telephone, letter, email)
<u>COMP 2017-001</u>	03.01.2017	10.01.2017	05.01.2017	2	Frontline	Email
<u>COMP 2017-002</u>	02.01.2017	10.01.2017	04.01.2017	1	Frontline	Email
<u>COMP 2017-003</u>	05.01.2017	12.01.2017	05.01.2017	1	Frontline	Email
<u>COMP 2017-004</u>	06.01.2017	13.01.2017	13.01.2017	5	Frontline	Email
<u>COMP 2017-005</u>	05.01.2017	12.01.2017	13.01.2017	6	Frontline	Email
<u>COMP 2017-006</u>	09.01.2017	16.01.2017	19.01.2017	10	Frontline	Email
<u>COMP 2017-007</u>	10.01.2017	17.01.2017	11.01.2017	1	Frontline	Facebook
<u>COMP 2017-008</u>	09.01.2017	16.01.2017	16.01.2017	2	Frontline	Email
<u>COMP 2017-009</u>	21.01.2017	27.01.2017	23.01.2017	1	Frontline	Email
<u>COMP 2017-010</u>	23.01.2017	30.01.2017	30.01.2017	6	Frontline	Facebook
<u>COMP 2017-008 Stage 2</u>	26.01.2017	23.02.2017	20.02.2017	17	Investigation	Email
<u>COMP 2017-011</u>	25.01.2017	01.02.2017	26.01.2017	1	Frontline	Email
<u>COMP 2017-011 Stage 2</u>	30.01.2017	extended from 27.02.2017 to 06.03.2017	06.03.2017	25	Investigation	Email
<u>COMP 2017-012</u>	25.01.2017	01.02.2017	25.01.2017	1	Investigation	Email

Extract from list of complaints received by the LLTNPA in 2017

I recommend anyone interested in the operation of the LLTNPA take a look at the entire complaints log [EIR 2018-005 Appendix B complaints](#). Its interesting that in very few complaints is it recorded whether the person complaining is satisfied or not. From my experience of talking to other people who have complained I believe the answer is generally no and from comments on social media for example

I doubt that any of the 30 or so people who complained about the closure of the Milarrochy Bay boat launching slipway have been satisfied by the response.

This is not the fault of front-line staff. Indeed, what the complaints log shows is that there are relatively few complaints about frontline staff, the complaints are about issues and most of those issues relate to provision of infrastructure by the National Park – or rather its failure to provide proper infrastructure:

- The closure of the Milarrochy slipway
- The numerous complaints about litter, particularly on west Loch Lomond – a consequence of the failure of the LLTNPA to ensure litter bins are provided and emptied where needed)
- Complaints about toilets and human waste – a consequence of the Park's failure to keep its toilets open 24/7 and to provide new toilets where needed

The complaints log classifies almost ALL the litter issues (under column "area complaint relates to) as "Non-NPA" ie not the responsibility of the National Park to sort out. This is the same National Park that claimed that because of litter left by a tiny minority of campers it needed to introduce camping byelaws.

So why is litter left by general visitors NOT the Park's responsibility when that left by campers is? How does this fit with the Partnership Plan which is supposed to govern all the LLTNPA does?

Instead of telling Ministers what is needed to address visitor management issues in the National Park, the LLTNPA is now claiming anything that is unconnected with camping is not their responsibility. More evidence that it is now acting as a Camping Management Authority rather than a National Park.

For the fact is the camping byelaws have distorted ALL the LLTNPA's priorities. Without the byelaws and the need to direct Ranger resources to chasing off campers, there would have been no need to close the Milarrochy slipway. That would not just have avoided a lot of complaints, it would have meant that during the European Swimming championships this year when the Duncan Mills slipway is due to be closed, boating folk could have still launched their craft on Loch Lomond. The camping byelaws have bled resources from where they are needed and the complaints log shows that LLTNPA staff are now trying to claim those other areas are no longer their responsibility. If the LLTNPA Board and its convener James Stuart don't put this right, the Scottish Government needs to step in and put this right.

Category

1. Loch Lomond and Trossachs

Tags

1. Camping bye laws
2. Freedom of Information
3. Governance
4. Litter
5. LLTNPA
6. visitor management

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