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### INTERNAL REVIEW OF FORESTRY COMMISSION SCOTLAND'S HANDLING OF MR NIALL THOMSON'S REQUEST FOR INFORMATION UNDER THE FREEDOM OF INFORMATION ACT

#### Summary

Mr Thomson requested information on 10 August 2007 on various points in the Carron Valley Recreation Project, Project Initiation Document (PID) MB 12/07 Version 3. Forestry Commission Scotland (FCS) wrote to Mr Thomson in his then capacity as Chair of Carron Valley Development Group (CVDG) (copied to others) on 24 August. The letter advised Mr Thomson that FCS was considering refusing all requests from members (and associates) of CVDG on the grounds that the requests were becoming "vexatious" and/or "persistent" requests within the Freedom of Information Act. Mr Thomson responded on 29 August explaining his reasons for submitting the request on 10 August and asking that the Forestry Commission consider its position very carefully. He added that the Forestry Commission should be mindful of its position under the Data Protection Act. On 6 September Mr Thomson's request was refused under sections 14 and 12 of the Freedom of Information Act.

#### The Request

On 10 August 2007 Mr Thomson submitted the following information request via the Freedom of Information request submission form on the Forestry Commission website:

"1. Reference: Carron Valley Recreation Project PID document MB 12/07 Version No 3 dated 04/06/07 page 1 "The West and Central Scotland Forest Cycling Development recommendations October 2005"

i) Please provide full details of the consultants brief for this report and the total expenditure including a breakdown of FES/FCS costs and third party consultations. li) Please also provide details on what FES/FCS policies were implemented as a result of the studies recommendations.

2. Reference: Carron Valley Recreation Project PID document MB 12/07 Version No 3 dated 04/06/07 page 2 " a new toilet block is being provided at no cost to FCS"

Please provide full details of the contractual arrangements between FCS and the organisation responsible for provision of this facility namely: outline Heads of Terms with the tenant providing this service including the date of practical completion:, what penalty clauses were written into the contract for failure to deliver the facility and expiry date of the current lease arrangement between the two parties.

3. Reference: Carron Valley Recreation Project PID document MB 12/07 Version No 3 dated 04/06/07 page 4 "Forestry Commission Scotland - an

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ambition for forest Cycling and Mountain Biking - Towards a National Strategy Final Report Dec 2005 carried out by Tourism Resources Company"

- i) Please provide full details on the consultants brief for this report and the total expenditure including a breakdown of FES/FCS costs and third party contributions.
- ii) Please also provide a summary analysis of the extent to which FES/FCS subsequently consulted other interested parties including the general public (following this report) and include a summary analysis of those third parties and general public responses.
- iii) Please also provide details on what FCS/FES policies were implemented as a result of the studies recommendations and how those reflected any consultation exercise outlined in point ii).

4. Reference: Carron Valley Recreation Project PID document MB 12/07 Version No 3 dated 04/06/07 page 14 "These proposals follow discussions between FDM and Head of Recreation, Tourism and Communities in October 2006. They represent a more accessible mountain bike trail provision as compared to proposals tabled by the CVDG at that time and crucially, are supported by the Carron Valley partnership (with the exception of CVDG) including the two local authorities"

Please provide demonstrable (written) evidence that "the two local authorities" had previous sight of and had approved and supported the project detail contained with FCS document MB 12/07 No 3 dated 04/06/07 prior to the report being submitted to the FES Board. "

### Timeline

10 August - Mr Thomson submitted his request.

24 August - FCS wrote to Mr Thomson. The letter stated that FCS had received 13 Freedom of Information requests in the past 3 weeks or so from CVDG members (and associates), and was considering whether these requests should be treated as "vexatious" and/or "persistent" requests within the Freedom of Information Act. The letter explained the reasons why this decision was being considered. It concluded by suggesting that the main issues, which the Group had raised, could be discussed at a meeting to be held as soon as possible.

29 August - Mr Thomson replied. He explained that it was very much in the public interest – in fact it was essential - that the documents he had requested were made available to him and in turn the Partnership. Whilst Forestry Commission appeared predisposed to issue a Refusal Notice, there was no justification for such action and he asked the Forestry Commission to consider its position very carefully. With regards to the other information requests his letter stated that:

"As regards the sundry matters you raise with alleged previous FOI requests, complaints etc, these are leading statements and it appears to me there is an

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attempt to establish the fact. I cannot agree the link you appear to be making and I cannot comment on other peoples alleged FOI requests and neither, I suggest, should you. If you have a problem, then I suggest you take up the matter with the individuals concerned."

31 August - Mr Thomson wrote again. His letter stated that his "request is non-negotiable, it will not be retracted and it will be followed up if ignored. I see two options: 1. Forestry Commission issue the information as requested and this will also inform my position for the meeting on the 12<sup>th</sup> 2. Forestry Commission issues a Refusal Notice. Please make your decision and tell me if you will now issue the information or issue a Refusal Notice."

6 September - FCS wrote to Mr Thomson. The letter stated that the requests that FCS had received from Group members were being refused as "vexatious" under Sections 14 and 12 of the Freedom of Information Act on the grounds that they would cause disproportionate inconvenience or expense. The letter went on to say that FCS wished to help provided the cost could be kept within prescribed limits, and suggested that if the Group submitted a single request outlining the key information it required then FCS might be able to assist.

11 September - Mr Thomson responded. He stated that while he was Chair of the CVDG he had submitted only one request. CVDG was a collection of individuals and FCS should write to these individuals directly.

18 September - Mr Thomson wrote again. He asked for an internal review to be conducted as to why his information request of 10 August had been refused, as he was not satisfied with the reasons given by FCS for the refusal. In his letter Mr Thomson also alleged that FCS had breached the Data Protection Act as correspondence concerning his personal details had been circulated among third parties on more than one occasion and without his consent.

20 September - Director FCS wrote to Mr Thomson saying that he had asked for an internal review to be carried out on how Mr Thomson's request had been handled.

### Scope

The review has considered whether FCS handled Mr Thomson's request for information correctly. Specifically it has considered whether FCS was correct in considering Mr Thomson's request in conjunction with other requests from CVDG members (and associates) and whether it was correct to subsequently determine that these requests for information were "vexatious" under sections 14 and 12 of the Freedom of Information Act. It has also considered whether a breach of the Data Protection Act occurred, what, if any lessons there are to be learned, and whether events subsequent to FCS's decision have a bearing. It was not within the scope of the review to consider the reasons why the sudden increase in information requests from Mr Thomson and other CVDG members (and associates) occurred.

## **Analysis**

### Handling the Information Requests as a Group

FCS grouped the requests from Mr Thomson and other CVDG members (and associates) as it believed that the requests had been submitted as part of a campaign aimed mainly at causing FCS inconvenience. The review has found that:

- The total number of FOI requests received by FCS during the period Jan - 31 August 2007 was 31. The number of requests relating to mountain biking activity in Scotland during this period amounted to 16.
- CVDG and FCS had been involved with others in the Carron Valley Partnership, which aimed to develop recreation opportunities in the Carron Valley. For some months CVDG had been in dispute with FCS over their aim of further development of mountain bike trails. There are indications that some members of CVDG saw Freedom of Information as a valid tool in furthering their aims and in eliciting information on future development sooner than it might otherwise have been made available to them as members of the Partnership.
- Of the 16 mountain biking related information requests 15 were received from CVDG members (and associates). 13 of the 15 requests were made during the period 29 July - 19 August.
- With one exception all the requests relating to mountain biking activity in Scotland during the period 29 July - 19 August came from past and present CVDG Committee Members.
- Appendix 1 details the CVDG Committee Members pre and post the CVDG annual general meeting on 18 September 2007 cross-referenced to the 15 information requests received from CVDG members (and associates).
- The one exception was from someone who resided at the same address as one of the members and whose request was in exactly the same font and layout as a request submitted by another member.
- The requests for information lodged by the Group were not the only correspondence. There were numerous emails from the same people seeking acknowledgements, highlighting perceived problems with the submission of their requests via the form on the Forestry Commission public website and from one individual a number of complaints against specific FCS staff.
- Finally there were a considerable number of what might be termed 'business-as-usual requests'. On occasion the information sought was the same or very similar to the information requested through the formal information requests.

Following the letter from FCS of 24 August saying that a refusal was being considered a number of the requesters including Mr Thomson wrote to say that they were acting as individuals. Despite this the review considers that there was sufficient justification for FCS to conclude that the Group were acting in concert. The review also considers that there was sufficient justification for FCS to aggregate the requests in determining whether the

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requests could be considered vexatious under sections 14 and 12 of the Freedom of Information Act.

### Section 14 Considerations

Section 14(1) - Section 1(1) of the Freedom of Information Act states that the general right of access to information 'does not oblige a public authority to comply with a request for information if the request is "vexatious"'.

The Information Commissioner's general advice regarding vexatious requests is set out in Awareness Guidance 22. This explains the Commissioner's general approach, which is that a request (which may be the latest in a series of requests) can be treated as vexatious where:

- It would impose a significant burden on the public authority in terms of expense or distraction;

And meets at least one of the following criteria:

- It clearly does not have any serious purpose of value;
- It is designed to cause disruption or annoyance;
- It has the effect of harassing the public authority;
- It can otherwise fairly be characterised as obsessive or manifestly unreasonable.

The test of whether section 14(1) applies is whether the particular request can be judged to be vexatious and not whether the requestor can be so judged. However while the overall scheme of Freedom of Information is clearly blind as to the identity and motive of the request the Information Commissioner accepts that both are valid considerations.

### Significant Burden

The number of information requests from the Group during the period 29 July - 19 August represented a significant increase on the normal number of requests received by FCS in a month. This is probably best illustrated by the fact that the number of requests made by the Group amounted to some 42% of the total number of information requests received during January - August. By estimating the potential costs of complying with these requests it is clear that a significant burden would have been placed on FCS. A burden, which would only have been able to be handled by FCS at disproportionate inconvenience and expense.

In addition to the information requests Mr Thomson and another CVDG member submitted a significant number of requests on "business-as-usual" Partnership matters. These contributed to the burden on FCS.

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### **Harassment**

The review considered the succession of information requests made by Mr Thomson and the Group. They were thematically similar in that all related to mountain biking activity in Scotland and specifically mountain biking on the FCS estate. However the information requests by themselves do not tell the complete story. As mentioned previously there were also numerous emails from the Group seeking acknowledgements, and highlighting perceived problems with the submission of their requests via the form on the FC public website. The cumulative effect was to harass FCS.

The review also considered the tone in some of the letters sent to FCS, the negative personal comments, and the complaints made by one member against specific FC staff. Generally, correspondence from Mr Thomson and the Group was sent to individuals. The review considers that any reasonable person would feel harassed by some of the contents.

### **Obsessive or manifestly unreasonable**

With regard to obsessive or manifestly unreasonable requests, the Commissioner's awareness guidance suggests that:

'It will be easier to identify such requests when there has been frequent prior contact with requester or the request otherwise forms part of a pattern, for instance when the same individual submits successive requests for information. Although such requests may not be repeated in the sense that they are requests for the same information, taken together they may form evidence of a pattern of obsessive requests so that an authority may reasonably regard the most recent as vexatious'.

The review has considered the nature and volume of correspondence generated by the requests submitted by Mr Thomson and the Group. The review considers that the sudden increase in the volume of information requests can be seen as a pattern of requesting behaviour that could be considered to be manifestly unreasonable by a dispassionate person. In reaching this conclusion, the review has taken cognisance of the suggestion in the Information Commissioner's guidance that vexatious cases "may well arise in connection with a grievance or complaint which an individual is pursuing against the authority".

For some months CVDG had been in dispute with FCS over the further development of mountain bike trails. There are indications that some members of CVDG saw Freedom of Information as a valid tool in furthering their aims and in eliciting information on future development sooner than it might otherwise have been made available to them as members of the Partnership.

This is perhaps best illustrated by a letter from Mr Thomson on 19 August to FCS copied to other Partnership members and the CVDG in which he made various points on the proposed Carron Valley Partnership meeting agenda on

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23 August and the July meeting minutes. An information request was included in the same letter asking what action FCS was taking to resolve written complaints about the public urinating in the car park.

### Section 12 Considerations

The requests from the Group were also refused under Section 12 of the Freedom of Information Act as FCS calculated that the total staff time involved in dealing with the requests from the Group would significantly exceed the appropriate cost limit of £600.

FCS justified the aggregation of the requests because:

- They had received two or more requests;
- The requests appeared to FCS to be from persons who appeared to be acting in concert or part of a campaign;
- The requests related to the same or similar information;
- They had received the requests within a period of 60 days.

Appendix 1 itemises the requests received during the period. This shows that 13 information requests relating to mountain biking activity in Scotland were received from the Group during the period 29 July - 19 August. The review's conclusions on whether the requests were submitted as part of a campaign are set out in 'Handling the Information Requests as a Group' above. FCS's estimates for providing the information requested are set out in the same Appendix. Based on the prescribed £25 per hour per person this amounts to £2,250. Significantly higher than the £600 cost limit.

The review is therefore satisfied that FCS was justified in aggregating the requests and refusing on the grounds of excessive costs.

One of the requests that came in during the period in question was answered. The cost of meeting this request was not therefore included in the FCS estimate. The CVDG member was copied in to FCS's letters of 24 August and 6 September.

### **Findings**

The review is satisfied that the requests from Mr Thomson and the Group imposed a significant burden on FCS. It is further satisfied that the requests had the effect of harassing FCS and could fairly be characterised as obsessive or manifestly unreasonable.

### **Freedom of Information/Business-As-Usual requests Information Accessible by Other Means**

No guidance is available from the Information Commissioner on the issue of differentiating FOI requests from "business-as-usual" requests. The Information Commissioner's Awareness Guidance No. 6 does however provide guidance on section 21 of the Freedom of Information Act the

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exemption from the duty to provide information on request when that information is reasonably accessible to the applicant by other means.

There was a significant amount of correspondence from the CVDG seeking clarification on Partnership related matters including but not exclusively limited to future Partnership meeting agendas, Project Initiation Documents, and minutes of FCS meetings at which Carron Valley Partnership matters were discussed. All of these would have been made available to CVDG and other members of the Partnership. A number of these documents i.e. Forest Enterprise Management Board meeting minutes would also have been made publicly available, albeit after ratification, on the Forestry Commission's website: <http://www.forestry.gov.uk/forestry/infd-74sm5r>

FCS chose not to use the exemption provided but by doing so they contributed to the burden being placed on them. It also assisted CVDG's campaign as CVDG claimed that a number of the documents were only made available because they had been obtained through requests lodged by members of CVDG.

### **Duty to provide Care and Assistance**

Section 16 of the Freedom of Information Act places a duty on public authorities to provide advice and assistance, so far as it would be reasonable to expect the authority to do so, to persons who propose to make, or have made, requests for information to it. Where a request has been refused, for example on grounds of excessive cost, it is appropriate for the public authority to assist the applicant in the making of a subsequent request.

The review has found that FCS offered such advice in its letters of 24 August and 6 September. In a letter of 29 August in response to FCS's letter of 24 August Mr Thomson wrote that

"As regards the sundry matters you raise with alleged previous FOI requests, complaints etc, these are leading statements and it appears to me there is an attempt to establish the fact. I cannot agree the link you appear to be making and I cannot comment on other peoples alleged FOI requests and neither, I suggest, should you. If you have a problem, then I suggest you take up the matter with the individuals concerned."

Mr Thomson followed this up on 31 August stating that his "request is non-negotiable, it will not be retracted and it will be followed up if ignored. I see two options: 1. Forestry Commission issue the information as requested and this will also inform my position for the meeting on the 12<sup>th</sup> 2. Forestry Commission issues a Refusal Notice. Please make your decision and tell me if you will now issue the information or issue a Refusal Notice."

CVDG is a registered charity (Mr Thomson's letter of 29 August), with a constitution and elected office bearers. Mr Thomson as then Chair signed the Partnership Concordat on behalf of CVDG and he has represented CVDG both in Partnership meetings and in correspondence. It is surprising therefore



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that on 11 September Mr Thomson in response to FCS's letter of 6 September wrote that "CVDG is an unincorporated association - a collection of individuals. I cannot therefore accept responsibility for a Refusal Notice on behalf of any individuals whom you presume to be associated with my Group."

Mr Thomson chose not to act upon the advice and assistance offered by FCS providing what to a reasonable person might appear a surprising response. He insisted instead that the information originally requested must be provided. This supports the conclusion that the requests submitted by Mr Thomson and the Group were "vexatious" and intended to harass FCS.

### **Alleged Breach of the Data Protection Act**

In his letter of 18 September Mr Thomson alleged that the Forestry Commission had breached the Data Protection Act as "correspondence containing my personal details has been circulated amongst third parties on more than one occasion and without my consent." As Mr Thomson has not been specific the review must conclude that he is referring to FCS's letters of 24 August and 6 September that were directed to Mr Thomson in his then capacity as Chair of CVDG and copied to others in the Group.

Mr Thomson submitted two of these requests, one on 10 August and one on 19 August. The request of 10 August was submitted through the Forestry Commission website and sought clarification on various points in the minutes of Forest Enterprise Management Board meeting. He advised Partnership members, the CVDG Secretary and the Carron Valley Group on 23 August that he had made this request (on three occasions). The 19 August request was included in the body of an email, copied to other Partnership members including various FCS staff, the CVDG Secretary and to the Carron Valley Group, about a Carron Valley Partnership meeting on 23 August. FCS was therefore aware that Mr Thomson had advised CVDG members (and others) that he had submitted Freedom of Information requests.

In considering whether a breach of the Data Protection Act has occurred the review has considered what might be Mr Thomson's reasonable expectation of what might happen with that information when taken in the context of his previous correspondence and other actions. It has concluded that a breach of the Data Protection Act's did not occur as a result of the alleged disclosure in FCS's letters of 24 August and 6 September. If however Mr Thomson is concerned that disclosure on other occasions was in breach of the Act the review would be happy to investigate these.

### **Developments since Refusal Notice was Issued**

There have been various articles in the press concerning the situation at Carron Valley. In the main this has been detrimental to FCS. An article in the Sunday Herald on 9 September, and subsequently posted on the CVDG website, claimed that Mr Thomson had "become so frustrated at the lack of communication from the commission that he had filed 16 requests under freedom of information legislation." As noted previously the number of

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information requests submitted by Mr Thomson and the Group was 15. The same article quoted Mr Thomson in his then position as CVDG Chair as saying "The commission has wilfully, deliberately and systematically sabotaged the project in order to permanently derail it." and "Money from the public purse has been needlessly wasted." In the same article another CVDG member was quoted as saying that "Ministers must bring the commission into line where their predecessors failed and sack those responsible for this mess if they are to keep Scotland's reputation as the world's top mountain-biking destination alive." These views appear to contradict the International Mountain Bicycling Association report card, which gave Scotland an 'A' grade for outstanding mountain biking and successful bicycling advocacy. The report card said that one of the big factors in achieving this was a "bike friendly forestry department."

Two of the information requests were submitted directly to the Scottish Government. FCS serves as the Scottish Government's forestry department and the two requests were passed to FCS to deal with. Both requests were subsequently included in the Refusal Notice issued on 6 September. Following representations from the requestor the Scottish Government has further considered the matter and has concluded that the requests are a matter for them to deal with directly.

### **Lessons To Be Learned**

#### Freedom of Information or Business-As-Usual Request

As mentioned previously there were a considerable amount of correspondence from some CVDG members on Partnership matters - 'business-as-usual' requests. In some cases these were marked as an information request by the requester and dealt with as such by FCS. On other occasions they were not marked and dealt with, as one might reasonably expect as normal correspondence. This situation is clearly unsatisfactory.

The review sought guidance from the Information Commissioner on the issue of differentiating FOI requests from "business-as-usual" requests but was advised that no such guidance had been produced. Clarification on this issue should be sought urgently from the Information Commissioner's office and the advice promulgated to all staff through the Forestry Commission Open Information Network.

#### Open Information Best Practice

#### **Training**

One request from a CVDG member was dealt with during the period when FCS was considering refusing information requests from the Group. Although generally the request was handled in accordance with Forestry Commission guidance the fact that it 'managed to slip through the net' indicates that there were some minor errors in handling. All staff responsible

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for dealing with Open Information requests should be reminded of Forestry Commission best practice.

### **Publication**

As mentioned previously there was a considerable amount of 'business-as-usual' type requests. Some of these would have been pre-empted if the documents requested had been published/were due for publication on the Forestry Commission public website. FCS should consider making more material publicly available e.g. Project Initiation Documents and minutes of Partnership meetings (with the agreement of the other members).

### **Conclusion**

The review is satisfied that at the time FCS took the decision to refuse the requests from the Group they were correct in their application of Sections 12 and 14 of the Freedom of Information Act. The review is also satisfied that a breach of the Data Protection Act did not occur.

However the Scottish Government has now decided that the two requests which they originally passed to FCS to deal with are matters that rightly fall on them to deal with directly. The review is also aware that one of the requests included in the Refusal Notice was dealt with. Director Scotland might therefore wish to consider whether FCS should give further consideration to their duty under Section 16 to provide advice and assistance and offer CVDG a further opportunity to submit a single request outlining the key information required that would keep the cost within prescribed limits. This offer was originally made in FCS's letter of 6 September but was not taken up by CVDG.

**Allan Dungavel**  
**Open Information Co-ordinator**  
**Forestry Commission GB**  
**18 October 2007**

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**Appendix 1**

<b>Date</b>	<b>Requestor</b>	<b>CVDG Position Held</b>	<b>FOI Ref</b>	<b>Information Requested</b>	<b>Outcome</b>	<b>Estimate</b>
1 June		Technical (Pre) Secretary (Post)	142240	Request for PID referred to at FEMB 31 May	Provided 29 June	
17 June				FOI Request extended to include very latest version of PID		
1 July		Technical (Pre) Secretary (Post)	143412	Pointing out no response to two questions asked re remedial works to trails following Dec 06 and Jan 07 Harvesting Works	Provided 9 July	
9 July		Technical (Pre) Secretary (Post)	143412	Follow up request seeking clarification on points in reply of 9 July	Provided 16 July	
16 July		Technical (Pre) Secretary (Post)	143412	Dissatisfied with Kenny Murray's reply of 16 July. Asked for 'direct answers' to points raised and for further information on contract.	Provided 20 July	
25 July		Technical (Pre) Secretary (Post)	142240	Requested copy of June FEMB minutes as promised in Kenny Murray's reply of 29 June.	Published on FC website	
29 July		Technical (Pre) Secretary (Post)	145314	Sought clarification on various points on PID Document 12/07 mentioned in FEMB June meeting minutes and sought PID for Mabie 'black trail'. Also referred back to his earlier request for info of 1 July and asked for further clarification.	Refused	7 hours
31 July		Secretary (Pre) Chairman (Post)	145352	Request for spreadsheet as mentioned in May FEMB minutes, paragraph 2	Refused	1 hour
2 August		Technical (Pre) Secretary (Post)	146687	Requested PID for Ae Forest development	Refused	6 hours
8 August		Technical (Pre) Secretary (Post)	145314	Extension of FOI request for information on process folowed that granted permission for trail construction at Kyle of Sutherland	Refused	6 hours

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Date	Requestor	CVDG Position Held	FOI Ref	Information Requested	Outcome	Estimate
8 August		Web Master Vice Chair (Pre) Ctte Mem (Post)	150140	Information on Woods In and Around Towns challenge fund projects In discussions to clarify request it transpired that the request was related to Carron Vally. Although information provided Mr Barton was included as copyee in FCS letters of 24 August and 6 Sept.	Provided	
9 August		Ctte Mem (Post)	150132	Copies of business cases for mountain bike related business to use buildings	Refused	16 hours
10 August	Niall Thomson	Chair (Pre) Ctte Mem (Post)	146018	Various items relating to PID version 3 dated 4 June 07 - sundry various details on each of consultants brief for West and Scotland Forest, toilet block, evidence that two local authorities had sight of project detail, Cycling and Mountain Biking - towards a National Strategy	Refused	15 hours
13 August		Secretary (Pre) Chair (Post)	146117	Details of SFGS award to part fund Golspie Wildcat Trails	Refused 6	8 hours
		Secretary (Pre) Chair (Post)	146623	Various details of job role of Special Projects Manager at Scottish Lowlands Forest District	Refused	4 hours
14 August		Ctte Mem (Pre) Vice Chair (Post)	150135	All correspondence between FC and Scottish Executive relating to proposed visit by then Sports Minister	Refused	2 hours
15 August		Secretary (Pre) Chair (Post)	146641	Full details of PID process (and any previous revisions) used for assessment of recreation projects on FC land	Refused	5 hours
16 August		Ctte Mem (Pre) Vice Chair (Post)	150136	Any Scottish Executive departments invited to comment on submitted feedback on Cycling and Mountain Biking - towards a National Strategy and if so copies of documents. Also what work Scottish Executive involved in with regards to development mountain bike trails on FCS managed land.	Refused	3 hours
17 August			150134	Mountain bike centre usage numbers in FCS or related to FCS and methodology used to collect	Refused	15 hours

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<b>Date</b>	<b>Requestor</b>	<b>CVDG Position Held</b>	<b>FOI Ref</b>	<b>Information Requested</b>	<b>Outcome</b>	<b>Estimate</b>
19 August	Niall Thomson	Chair (Pre) Ctte Mem (Post)	150137	Various points on proposed agenda for CVP meeting on 23 August and July meeting minutes. Some overlapping with FOI requests. FOI Request mentioned in para 3 - what action FCS taking to resolve written complaints about public urinating in car park.	Refused	2 hours

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