

# Consultation Response Form

## PART 1 – Information about you

Completion of this section is mandatory as it helps with our analysis of results. A note at the end of this form explains that we may be obliged to release this information if asked to do so.

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| Company Name or Organisation (if applicable) | Alliance Party Northern Ireland                     |

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|--|---|
| Please tick one box from the list below that best describes you/ your company or organisation.   |   |
| <input type="checkbox"/>   | Small to Medium Enterprise (up to 50 employees) |
| <input type="checkbox"/>   | Large Company                                   |
| <input checked="" type="checkbox"/>  | Representative Organisation                     |
| <input type="checkbox"/>   | Trade Union                                     |
| <input type="checkbox"/>   | Interest Group                                  |
| <input type="checkbox"/>   | Local Government                                |
| <input type="checkbox"/>   | Central Government                              |
| <input type="checkbox"/>   | Other Emergency Service (Police/Fire/Ambulance) |
| <input type="checkbox"/>   | Member of MCA Staff                             |
| <input type="checkbox"/>   | Member of a Coastguard Rescue Service team.     |
| <input type="checkbox"/>   | Member of the public                            |
| <input type="checkbox"/>   | Other (please describe):                        |
| If you are responding on behalf of an organisation or interest group, how many members do you have and how did you obtain the views of your members?:<br>The Alliance Party of Northern Ireland is Northern Ireland's fifth largest political party, with seven seats in the Northern Ireland Assembly and one in the House of Commons, as well as 32 local councillors. All elected members were consulted in the preparation of this response by email and/or discussion at team meetings. |   |
| If you would like your response or personal details to be treated confidentially please explain why:   |   |

## **PART 2 – Questions about the proposals**

### **Question 1 (Chapter 1)**

We have set out the changes that would affect the way the Coastguard needs to operate. Are there any other changes and pressures that should be taken into account in our plans for a modernised Coastguard service? Please provide supporting evidence for your comments.

The North Channel is one of the busiest shipping routes in the UK and traffic is set to increase. We feel that it would be unwise to remove 24 hour support and protection from Northern Ireland waters. Belfast Coastguard dealt with more than 700 incidents last year.

Factors which warrant consideration and are likely to result in increased marine traffic in the North Channel and in Belfast Lough itself include:

- continued development of Belfast as a desirable destination for cruise ships;
- construction of new marina facilities as part of the redevelopment of Titanic Quarter by the Harbour Commissioners;
- regular and frequent ferry traffic;
- continued and increased use of Belfast Lough by pleasure craft; and
- continued traditional seafaring activity including fisheries.

Water rescue is also likely to be required in the event of any air disaster. The majority of take-offs and landings to Belfast City Airport occur over Belfast Lough. Similarly, take-offs and landings to the City of Derry airport also occur over water.

The Belfast Coastguard is responsible for co-ordinating search and rescue for the Sperrins and the Mourne mountains and inland waterways such as Lough Erne and Lough Neagh. These areas are becoming increasingly busy due to growth in Northern Ireland tourism.

Northern Ireland relies on all freight to be shipped. It is imperative that appropriate measures are taken to maintain the safety and security of this link with the rest of the UK.

## Question 2 (Chapter 2)

We have explained the current Coastguard structure and the potential weakness in that structure in the face of increasing demand. Are there other strengths or weaknesses in the current arrangements that we should be taking into account? Please provide supporting reasons for your comments.

There is a high level of respect and support for the Belfast Coastguard across Northern Ireland and throughout society. The existing service is highly valued and recognised as being integral to public safety in Northern Ireland. There is strong cross party support for the retention of the Belfast Coastguard as a 24 hour station.

The service of the Belfast Coastguard is exemplary. The highly motivated employees demonstrate strong personal commitment to ensuring the safety of people using local waters. It is testament to the level of dedication to their work that many of the Coastguards also volunteer as lifeboat crew. In fact, we are concerned that changes to staffing within the Bangor centre could have a knock-on effect to this crucial volunteer service.

The combined professional and voluntary experience of members of the Belfast Coastguard gives them a level of detailed local knowledge and a close working relationship with local responders which we do not believe can be replicated remotely. We understand that the Belfast Coastguard are currently examined every two years on their local knowledge to ensure that they can respond as effectively and quickly as possible in an emergency. Whilst we recognise that there are technological solutions to facilitate remote coordination, the development of which are vital to ensuring resilience in the Coastguard service for Northern Ireland and the rest of the UK, the seconds lost while those unfamiliar with the local geography, conditions, and accent deal with incoming calls may be the difference between life and death for those awaiting a response.

We are concerned that appropriate consideration has not been given to incident severity or duration in the formation of these modernisation proposals. Specifically, the graph showing 'Typical pattern of demand by time' (p17) presents a skewed picture as it is only based on the time the incident started, and does not take into account the duration or severity of incident. We understand that data that takes into account duration of incidents markedly decreases the difference in loading between day and night. Night time incidents tend to last longer because there are not as many short duration beach/cliff and close inshore pleasure craft incidents at night. Night time incidents are much more likely to involve commercial shipping and fishing vessels which will be operating much further away from shore and in poorer weather conditions. These incidents are more complex and take longer due to the distances involved.

### Question 3 (Chapter 3)

Under our proposals we would establish two Maritime Operations Centres handling emergency messages 24 hours a day, supported by a number of sub-centres operating at times of peak demand linked by a national network of radio connections and information sources. In your view, does this provide an appropriate and effective approach to Search and Rescue coordination response? Please provide supporting reasons for your comments.

We understand that front-line staff from Belfast, Swansea and Humber have developed an alternative proposal for modernisation of the Coastguard. We support this proposal and feel that it addresses modernisation and building resilience throughout the UK. We believe that this proposal warrants proper consideration and costing.

The existing plan to reduce Belfast Coastguard from 24 hour coverage to daytime only cover does not reflect that, whilst across the UK around 70% of calls are received between 7am and 7pm, that call distribution is not reflected locally in Northern Ireland. In fact, we understand that the Belfast Coastguard actually tends to be busier in the evenings.

It is proposed that the six sub-centres would be staffed during daylight hours only and responsibility for search and rescue at night would be handed over to the Operation Centres with a return handover from the Operation Centres to the sub-centres the next morning. We are concerned that these handovers could cause problems particularly as they cannot be face to face, and information may be lost. We feel that ideally all sub-centres should operate 24 hours a day, giving the seafarers and public who rely on the Coastguard a consistent service.

We are concerned that appropriate trials and tests have not been carried out in relation to the changes proposed by the consultation document. We understand that the MCA has indicated that these will take place in future should the proposals go ahead but we feel that a decision on the proposals should not take place without adequate trials.

#### Question 4 (Chapter 4)

Our proposals for Maritime Operations Centres and sub-centres locates these around the UK coastline and makes use of the MCA current estate. What is your opinion on the proposals for the location of these Centres and sub-centres? Please provide supporting reasons for your comments.

We are primarily concerned about the impact of the current proposals on people in Northern Ireland, who rely on the excellent service currently provided by HM Coastguard Belfast. There is cross-party support in Northern Ireland for the retention of the Belfast Coastguard as a 24 hour station.

Northern Ireland, unlike other parts of the UK, has only two Category One emergency responders, namely, the Police Service of Northern Ireland and HM Coastguard. The loss of the 24 hour cover at Belfast Coastguard station would, therefore, be a major blow to the coordination of search and rescue response locally. Not only do the Coastguard deal with the coordination of search and rescue at sea, they also cover Northern Ireland's inland water ways, such as Lough Neagh and Lough Erne, which are hugely important to tourism and leisure. In addition, they are routinely involved in coordinating search and rescue operations on remote inland areas such as the Mourne.

As the only UK Coastguard station with a land border with another European State, the Belfast station fills a unique role, in providing liaison and coordination with the Irish Coastguard, and the loss of the local relationships would, we believe, be detrimental to this. The Belfast Coastguard has a very close working relationship with the Irish Coastguard which, at the present time, extends to the use of the Irish Coastguard's Search and Rescue Helicopters, stationed in Galway and Dublin, at no cost to the UK taxpayer.

We are extremely concerned that any change to the arrangements which would move the liaison point outside the island of Ireland, with all of the political sensitivities that could result, may jeopardise this access. Whilst the current arrangement is unlikely to come under scrutiny or, indeed, threat, from the Irish Government whilst the liaison station is located in Northern Ireland, as any attempt to withdraw such direct cross-border cooperation between North and South would ignite political sensitivities, it is unclear whether the same holds true if the liaison station were to be elsewhere in the UK.

It is also worth noting that all of Ireland operates on Irish Grid coordinates rather than UK coordinates, which needs to be borne in mind in the context of any changes.

We understand that the Belfast Station has more qualified Search and Rescue Mission Coordinators than any other Coastguard station in the UK and we are concerned that this expertise is unlikely to transfer to alternative stations if the Belfast Coastguard's hours and staffing levels are reduced as proposed. Lower house prices in Northern Ireland and the fact that, due to relatively low wages, many of the staff are the second earners in their household, will make it incredibly difficult for staff to relocate to other parts of the UK, either within HM Coastguard or to take up other posts within the UK Civil Service. As you will be aware, as member of the Imperial Civil Service, transfer to the Northern Ireland Civil Service is not an option, so many will face redundancy.

**Question 5** (Chapter 4)

In your view, are the new roles and responsibilities for Coastguard officers at different levels in the proposed structure appropriate to the tasks that need to be delivered? Please provide supporting reasons for your comments.

## Question 6 (Chapter 5)

Under these proposals the regular Coastguard working in Maritime Operations Centres and sub-centres will draw more heavily on the local knowledge of geography, community and coastal risk provided by the network of local volunteer HM Coastguard Rescue Teams and increased liaison with partner SAR organisations. Do you agree that this is the best way to ensure the availability of such knowledge. Please provide supporting reasons for your statement.

We are concerned that the impact of changes to co-ordination or emergency response could impact the level of volunteerism within RNLI. It is foreseeable that fewer volunteers will come forward to participate in rescues if their bond with the co-coordinating service is less strong due to changed arrangements.

We are also concerned that the proposed changes could negatively impact the existing strong relationships between Coastguard staff and volunteers who carry out search and rescue. Likewise existing relationships between the local tourism/leisure sector and coastguards could be at risk.

We are convinced that personnel at the Co-ordination Centre receiving a distress or 999 call need adequate local knowledge in order to accurately position the incident and callout the correct resources. (Please also note other references to the importance of local knowledge in responses to questions 2 and 4.)

We are also aware that there is a high level of co-operation between the Republic of Ireland coastguard and the coastguard service in Northern Ireland, especially during a rescue mission. We would be concerned that this could be reduced, should the Northern Ireland Coastguard Station be lost to another region in the UK.

It is also important to note that Northern Ireland uses the Irish, not UK, grid co-ordinates when pinpointing locations for rescue missions. Although this could be resolved, it may add complexity, and waste time when trying to organise a rescue.

### Question 7 (Chapter 5)

In your opinion, will the proposed strengthening of management for the Coastguard Rescue Service organisation, including the introduction of 24/7 on-call Coastal Safety Officers, provide a more resilient response service to those in need in UK coastal areas? Please provide supporting reasons for your comments.

We believe that the most resilient networks are those which are widely distributed and highly interconnected. We understand that currently stations are paired and that both stations in a given pair have to be affected before there is a complete loss of service. We are concerned that the proposal to concentrate all equipment into two Operation Centres could result in loss of service with far greater consequences.

We are also concerned that if the Belfast Coastguard were to be closed, in a major incident there would be no local facility to interface with other responders.

The consultation document states "Maritime Operations Centres would be linked directly to all Coastguard aerial sites". If each of the Operation Centres was connected directly and independently to every Coastguard aerial site that would be the best possible arrangement with only two Operation Centres. However, we are concerned that the consultation document may be unclear in this regard. We understand that senior management within HM Coastguard have confirmed that each Operation Centre will be directly connected to every Coastguard aerial site in their half of the UK and also connected directly to a selection of key sites in the other half. Therefore if an Operation Centre fails normal service will be maintained in half the UK but the rest of the UK will suffer reduced service.

We believe that maintaining the Belfast Coastguard as a station separate from the mainland boosts resilience in the event of a major incident or pandemic.

Any further comments you may wish to make:

In light of the comments provided with respect to the need for strong local provision and the high quality of the existing service, we would urge you to reconsider the proposals with a view to retaining the 24 hour cover currently provided by the Belfast Coastguard.

We support the alternative proposal put forward by front-line staff from Belfast, Swansea and Humber and feel that that it has the potential to address modernisation and building resilience throughout the UK whilst maintaining a suitable level of service. We believe that the proposal may be a viable alternative to the Governments proposals and warrants proper consideration and costing.

## **Freedom of Information**

Information provided in response to this consultation, including personal information, may be subject to publication or disclosure in accordance with the access to information regimes (these are primarily the Freedom of Information Act 2000 (FOIA), the Data Protection Act 1998 (DPA) and the Environmental Information Regulations 2004).

If you want information that you provide to be treated as confidential, please be aware that, under the FOIA, there is a statutory Code of Practice with which public authorities must comply and which deals, amongst other things, with obligations of confidence.

In view of this it would be helpful if you could explain to us why you regard the information you have provided as confidential. If we receive a request for disclosure of the information we will take full account of your explanation, but we cannot give an assurance that confidentiality can be maintained in all circumstances. An automatic confidentiality disclaimer generated by your IT system will not, of itself, be regarded as binding on the Department.

The Department will process your personal data in accordance with the DPA and in the majority of circumstances this will mean that your personal data will not be disclosed to third parties.