



Maritime and Coastguard Agency

PROTECTING OUR SEAS AND SHORES IN THE 21ST CENTURY

REPORT ON THE CONSULTATION RESPONSES

June 2011



"The backbone of the Coastguard will always be the men and women who know the shores, love the sea and will do their utmost to save lives at sea and around our coast"

Presentation of Her Majesty's Colour to HM Coastguard 20 July 2005

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Contents

	Page Numbers
Title page	1
List of Contents	2
Executive Summary	3-6
Introduction	7
Section 1 Aim of an Independent Review	8
Section 2 Composition of the Review Team	9
Section 3 The Review Process	10-11
Section 4 Themes and Findings	12-15
Section 5 Alternative Proposals	16-18
Section 6 Locations	19
Section 7 Risks and Concerns	20
Section 8 Ideas	21
Section 9 Observations	22
Annex A Review Process Schematic	23
Annex B Metrics	24
Annex C Review Team	25
Annex D Terms of Reference for Review Team	26-29
Annex E Terms of Reference for Corporate Governance & Risk Team	30-31
Annex F Statement of Internal Audit of the Review Process	32
Annex G Consultation Questions	33
Annex H Characterisation Descriptors	34-35
Annex I Summary of Alternative Proposals	36-46
Annex J Common Themes of Concern by Group of Respondent	47
Annex K Risks and Concerns Log	48-49
Annex L Ideas Log	50-60
Annex M Glossary of Terms	61

EXECUTIVE SUMMARY

Background

In December 2010, the Government announced a formal consultation on its plans to modernise HM Coastguard and a consultation document 'Protecting our Seas and Shores in the 21st Century' was issued immediately following that announcement. The consultation document provided information about the modernisation proposals under consideration. These included improved technology to deliver a nationally networked and more resilient service, at lower cost and staff would be better rewarded for taking on increased responsibilities with enhanced career opportunities.

A team comprising 17 serving Coastguard Officers including four Public and Commercial Services Union (PCS) representatives was assembled to independently review the responses to the consultation. The team was led by a senior Coastguard Officer with a Maritime & Coastguard Agency (MCA) Non-Executive Director as Chair.

The review team carried out a quantitative review of the responses to the consultation document to identify key themes and concerns. At the same time a qualitative examination was completed to identify risks and ideas. In the case of alternative proposals received the rationale and underlying drivers have also been noted.

In producing this independent review report it was not the team's mission to provide an alternative or final solution or to apply judgement as to whether a response was in favour of, or against, the proposals. The questions contained in the consultation document invited evidence based comment and the exercise was intended to gather information rather than conduct a referendum.

The team's work was monitored throughout by members of staff from the MCA Corporate Governance and Risk Division and the PCS representatives.

Major Themes and Messages

Local Knowledge

This was by far the biggest area of concern (32%), with comments primarily from the small boat (<300gt), leisure and recreational sectors. The modernisation proposals were not seen to provide a reasonable level of assurance. There were three recurring themes under local knowledge:

- loss of local knowledge or slow access to local knowledge leading to delayed or incorrect response and potential loss of life;
- over reliance on the volunteer Coastguard Rescue Service (CRS) or other partners such as the Royal National Lifeboat Institution (RNLI) to fill the

- local knowledge gap arising from the closure of a local Rescue Co-ordination Centre (RCC); and
- difficulties likely to be encountered in relocating current serving Coastguard Officers, who have the local knowledge, to the remaining RCCs owing to personal circumstances at their present location or constraints on financial support packages.

Concept of Operations (how the new proposals will work in practice)

This was the second significant area of concern (16%). The most common comment was that the remaining RCCs should be run on a 24/7 basis. The main drivers being:

- that a handover between a daytime Rescue Sub Centre (RSC) and a Maritime Operations Centre (MOC), in particular for ongoing incidents, is high risk;
- lack of local knowledge will be heightened at night; and
- there is the potential to create a two tier Coastguard Service with the staff at the RSCs being viewed as 'second class' and with limited career development opportunities in the daytime set up.

Additionally the modernisation proposals did not give enough detail on the likely work practices, procedures and protocols envisaged within the new MOC/RSC structure making respondents apprehensive about the quality of service delivery and commenting on the need for exhaustive trials and testing.

The need for the current regional operations structure was challenged against the background of a downsized national service.

Resources and People

The primary issues here concerned basic levels of pay, the relocation package or the severance package if compulsory redundancies became necessary. The modernisation proposals indicated that introduction of new technology and working practices would require enhanced skills and would be appropriately rewarded. Naturally without any detailed information, staff concerns were heightened.

Technology

Costly Public Sector failures to successfully deliver major system/technology improvements prompted many concerns over the MCA's ability to introduce the key technological improvements that underpin the proposed modernisation. Generally, this part of the modernisation plan was well supported, with the caveat of the need for detailed planning and testing before roll out and RCC closure.

Regulation

Several of the MCA's stakeholders felt that existing regulations covering the small boat and leisure sectors were in need of modernisation. Suggestions included the testing and licensing of yacht and small boat users and life jacket regulations (parallels with the motor industry). Respondents felt funds raised could be used to offset MCA costs.

Alternative Proposals

27 submissions with alternative proposals were received mainly from RCCs or serving officers, one from the PCS and another from a local authority.

Their main messages were –

- a reduced number of RCCs (retaining between 6 and 15 centres);
- a geographic spread of stations to cover each devolved administration, minimise staff relocation, and maintain local knowledge;
- 24/7 operations throughout, therefore retaining more staff;
- support for investment in an upgraded communications network to improve national and territorial resilience;
- low support for the two MOC concept – lack of operating process details in the proposals may have been a contributory factor; and
- low support for the proposed changes to the CRS and its revised management; also uncertainty around its operational interface with MOCs/RSCs.

Summary

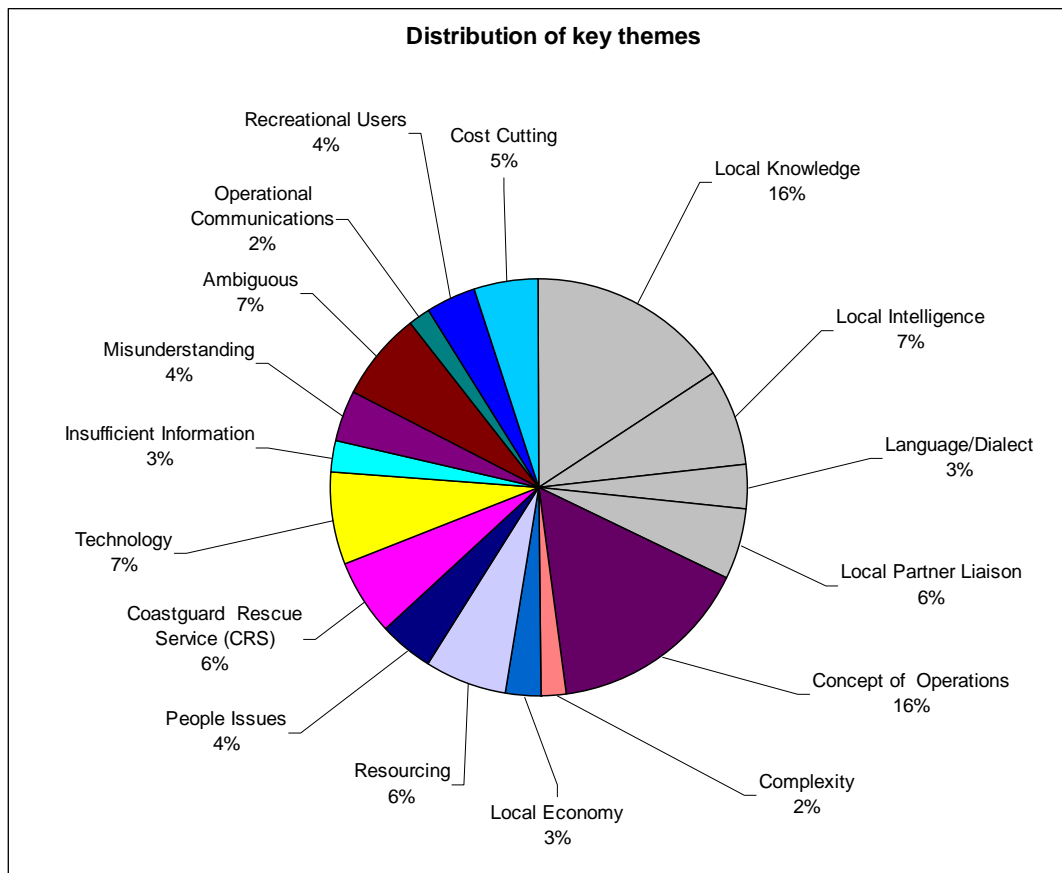
The Findings in this Report reflect the content of the responses to the consultation on the modernisation of HM Coastguard and express varying concerns about different aspects of the proposals. Whilst there is general acceptance of the need for HM Coastguard to modernise, the respondents have questioned the modernisation as proposed and argued that its radical nature will reduce the UK's capability to continue to respond successfully to maritime and coastal emergencies.

The lack of operational detail in the consultation proposals and the likely loss of experience, local knowledge and an untested concept of operations and supporting technology have raised doubts about the proposals' validity and credibility.

From the responses received it is clear that the final decision on a modern Coastguard infrastructure and concept of operations needs to be carefully explained to staff and members of the public and that thorough testing is required before implementation to ensure the planned improvements and efficiencies can be safely realised.

Quantitative Summary: Themes and Concerns

A quantitative summary of key themes and concerns identified from all the responses received during the consultation period, including the alternative proposals, are shown in the chart below. Definitions of the characteristics used in the chart can be found in Annex H.



Introduction

In December 2010, the Government announced a formal consultation¹ on its plans to modernise HM Coastguard. The consultation document 'Protecting our Seas and Shores in the 21st Century' was issued immediately following that announcement with a closing date for responses of 24 March 2011 which was subsequently extended to 5 May 2011.

The consultation document provided information about the modernisation proposals under consideration and in particular the use of technology to move away from territorial centres and deliver a nationally networked and more resilient service, at lower cost, with better rewarded staff taking on increased responsibilities and with enhanced career opportunities. The document also highlighted that the scope of the consultation focused around 7 key questions (as listed at Annex G) with an option to add any other comments not covered by the key questions.

The consultation was owned by the Department for Transport (DfT) but managed by the MCA. An independent in-house team of experienced Coastguard Officers led by a well respected senior Coastguard Officer and chaired by an MCA Non-Executive Director was formed to carry out the review. This took the form of a quantitative and qualitative consideration of all responses to the consultation received up to the closing date of 5 May 2011. Response channels consisted of e-forms (as per consultation document), emails, letters and larger responses in the form of some alternative suggestions to those described in the consultation document.

Neither the Chair, team leader nor team members had been involved in the development of the modernisation proposals within the consultation document and the team acted in an impartial, independent and discreet manner to capture the themes, ideas, risks and alternative proposals from the responses.

The PCS Union played an integral part in developing the process and, through their involvement in the review of the responses, has ensured the process has been open, independent and impartial.

The output from the review team's work is contained in this report which details the key findings from the consultation.

The Chair was not required to resolve any disagreements within the independent review team.

¹ In accordance with HM Government Code of Practice on Consultation

Section 1

Aim of an Independent Review

1.1 The purpose of an independent review is to ensure impartiality and transparency throughout the review process including the production of the final review Report.

1.2 The purpose of this Report is to:

- provide information on the methodology used to review the responses to the consultation;
- report on the key themes, concerns, ideas and risks gathered from the responses to the consultation proposals;
- provide findings and observations arising after careful consideration of all responses on the basis of all evidence received; and
- to continue DfT/MCA's commitment to an impartial and transparent approach to the consultation process.

1.3 The process to capture the response data was as follows:

- all e-forms, e-mails, letters, alternative proposals and other written responses were recorded, referenced and catalogued under the appropriate question on receipt, where no specific question was addressed this was categorised as 'any other comments';
- all requests for information under the Freedom of Information Act were logged and responded to within the time frames set down by the Act. Replies to FOIA responses were published on the MCA website.

1.4 The response data capture was carried out by a team drawn from executive and administrative staff within MCA HQ.

1.5 A full audit trail has been compiled and comments used in reports and feedback can be traced back to source. A schematic of the review process is at Annex A and response numbers at Annex B.

Section 2

Composition of the Review Team

2.1 The Government decided that because of the technical and specialist nature of the proposals that the independent review team would consist of Coastguard Officers who had no involvement with, nor made any direct contribution to the concepts that underpinned the modernisation proposals described in the consultation document. This included the Chair, a Non-Executive Director to the MCA, and the Team Leader, a senior Coastguard Officer. Most importantly, the team would act fairly and without bias and operate separately from those responsible for the authorship of the consultation document.

2.2 The Team Leader was tasked with assembling a team of 12 Coastguard Officers with a range of grades, experience, location and gender. This team was augmented by 4 additional Coastguard Officers acting in their capacity as representatives of the PCS Union and an additional Coastguard Officer representing senior coastal managers and to act as deputy team leader. The Review Team is listed at Annex C.

2.3 The Review Team was first brought together on 4 May 2011 where the members were briefed as to their responsibilities; their terms of reference; the timeline and the methodology to be used to review the responses. The team met over two separate weeks to carry out their review of the responses to the consultation. The full terms of reference for the team are at Annex D.

2.4 An auditor from the MCA's Corporate Governance and Risk Division (CG&R) was present throughout the review process to provide assurance that the collection and review of the responses was carried out in accordance with HM Government's Code of Practice on Consultation. CG&R has remained involved to ensure that this Report and its findings are an accurate reflection of the responses and their evaluation. Terms of reference for CG&R are at Annex E.

2.5 A statement from CG&R on their internal audit of the review of the responses to the consultation is shown at Annex F.

Section 3

The Review Process

3.1 Responses were received as e-form, e-mail, letter or other written format amounting to a total of over 1,800 items of correspondence which contained replies to all or some of the 7 separate questions posed in the consultation document (See Annex G). This included an invitation to add any other observations or comments not covered by the questions and for the purposes of the review, this was treated as question 8.

3.2 e-form responses with answers to some or all of the questions provided the bulk of these submissions and each answer was catalogued under the appropriate question thereby producing a catalogue of responses for each question. Where a response did not address any specific question, it was catalogued under the 'any other comments' question. The responses to each question plus email, letter and other written responses gave rise to over 14,000 individual answers or comments that needed to be scrutinised and characterised.

3.3 In the first part of its review, the team devoted its time to the characterisation of these answers and comments in relation to 18 possible descriptors (see Annex H) plus the extraction of risks and ideas. This included "no comment" where a question was not addressed. Each answer or comment was characterised under one or more of these descriptors and gave rise to over 25,000 individual items of data, including over 8,100 'no comments' being recorded. These were used to identify key themes and common concerns in relation to each question. The results of this characterisation are at Annex J where the table shows the common themes of concern against the various groups of respondents.

e-form process

3.3.1 The review team was divided into 8 pairs, with a mix of grades, location and experience within each pair. This also ensured that a process of dynamic peer review occurred simultaneously with the evaluation of each response. For the first two days, one PCS representative was given a roving assignment to sit in with each pair to ensure the agreed methodology and process was being adhered to.

3.3.2 Each pair was given the catalogue of responses to one of the eight questions in order to read each answer or comment and to attribute the appropriate characterisations and record risks, concerns and ideas accordingly.

Hard copy process

3.3.3 The characterisation of hard copy e-mails, letters and other written responses was carried out in the same way, using the same pairs working through the documents and attributing characteristics accordingly.

Submissions with alternative proposals - process

3.3.4 27 of the responses described alternative proposals, incorporating different organisational, structural and technical network laydowns to that contained in the consultation document. For this part of the review, the team was divided into groups of 4 or 5 to concentrate on the characterisation and summarising of these alternative proposals. These groups were predetermined and allocated submissions to review which did not relate to the home or neighbouring RCCs of the group members, and avoided submissions they had personally submitted or those of colleagues from their own or neighbouring RCCs. More detail of these alternative proposals is shown in Section 5 and the summaries are shown at Annex I.

Section 4

Themes and Findings

4.1 The themes and findings that emerged across the responses are as follows:

LOCAL KNOWLEDGE

Finding 1

That the overriding concern in the responses to the consultation was that the proposed reduction in RCCs will lead to loss of local knowledge, local intelligence, give rise to potential difficulties with local language and dialect and lead to delayed response and potential loss of life.

Finding 2

That the proposals placed an over-reliance on SAR volunteers for local knowledge when in fact, because they are volunteers, they may not be available or their local knowledge may be inconsistent and at no set standard.

Finding 3

The importance and context of local knowledge and its associated factors in SAR co-ordination were thought to be under-valued in the proposal.

Finding 4

Many of the concerns relating to local knowledge emanated from, or were related to, the small craft user and recreational community who felt they had not been adequately considered in the proposal.

LOCAL RESILIENCE AND RELATIONSHIPS

Finding 5

That the reduction in the number of RCCs will weaken the local operational relationships with devolved administrations, emergency services, SAR and civil resilience partners and that this will impact on command, control, communications and co-ordination within single or multi-agency incidents including major incident working.

Finding 6

The reduction in the number of RCCs could lead to isolation of Coastguard Rescue Teams (CRTs) and other SAR partners who view RCCs as the focal

point for Coastguard activity and a source of local knowledge and maritime information.

Finding 7

Respondents felt that the proposed 'centralisation' of HM Coastguard will weaken its local 'presence' when the current Government drive is for regional advancement and an increased localism agenda.

Finding 8

That there was no real evidence in the proposals that new or developing external pressures eg major expansion in off-shore renewable energy developments, importation of Liquid Petroleum Gas and other marine related activities and industries have been considered.

CONCEPT OF OPERATIONS

Finding 9

The consultation proposals lacked detail of the MOC role, concept of operation and its relationship with the daytime RSCs. The lack of information concerning the protocols, processes and procedures to be used in support of such a concept were also noted by respondents.

Finding 10

The respondents saw no evidence of robust testing or field trials to prove the MOC and daytime RSC concept of operations nor of the technological solution that will facilitate this concept and the wider modernisation.

Finding 11

The handover of incidents from daytime RSC to MOC and vice versa was perceived to be high risk for delivering emergency response which could be mitigated by providing 24 hour cover at the retained centres.

Finding 12

That whilst there was support for a modernisation of HM Coastguard it was based on 24 hour cover at any retained centres. There was little support for daytime RSCs.

Finding 13

Respondents felt that the complexity of co-ordinating SAR response operations by a volunteer Coastguard Rescue Team in the 'dry' coastal littoral area when involving land, sea or air assets and its relationship with the MOC or RSC was not addressed in the consultation proposals.

Finding 14

Respondents indicated that the proposals assume an unrealistic level of technology in terms of communications and navigational aids within the small boat and recreational community.

Finding 15

Respondents indicated that the MCA Regional operations structure worked against the concept of a national maritime emergency response system by putting an unnecessary 'dog-leg' in the command and control chain.

THE COASTGUARD RESCUE SERVICE

Finding 16

That the demands already placed on the volunteer CRS are such that there is little or no capacity to take on the proposed additional roles, particularly the complex process of on scene co-ordination, and the additional training it will entail.

Finding 17

That whilst there was support for strengthening the management of the CRS as per the proposals, some respondents questioned the need to introduce another layer of management and preferred the introduction of a layer working in support of current Sector Managers which would also introduce a degree of succession planning and career development.

Finding 18

That a considerable investment in technology will be required to achieve the proposed improvements in the management of, and support to, the CRS, and for the data transfer requirements needed to ensure effective on-scene co-ordination.

RESOURCING AND PEOPLE

Finding 19

That the reduction in the number of RCCs and the lack of mobility amongst staff could potentially lead to a substantial loss of expertise and experience which *in extremis* could affect MCA's ability to fulfil its statutory SAR co-ordination role and maintain its Vessel Traffic Monitoring (VTM) capability.

Finding 20

That the staffing of MOCs and daytime RSCs could lead to an unacceptable two-tier Coastguard service in terms of grade, pay and operational exposure.

Finding 21

That the modelling of RCC activity to identify peak and non-peak periods did not appear to have included all non-SAR tasks and may not represent the true picture of RCC activity patterns.

Finding 22

That the proposals minimised the opportunities for career advancement as there would be fewer sites and fewer posts.

Finding 23

That many respondents raised questions concerning the 'unknowns' i.e. new terms and conditions of service; annualised hours and watch patterns; relocation package; redundancy terms.

TECHNOLOGY

Finding 24

That the updates and improvements to HM Coastguard's existing information technology, which would underpin the modernisation proposals, were untested and unproven in a live environment.

Finding 25

That other Government and Local Authority failures to deliver successful implementations of major system/technology improvements prompted questions concerning the MCA's ability to deliver the key improvements which were the corner stone of the proposed modernisation.

THE PROJECT

Finding 26

Concern was expressed that the extended period of consultation and the potential for more to come would impact on the delivery period. A number of respondents felt the time line was unrealistic in the base case.

Section 5

Alternative Proposals

5.1 A total of 27 submissions were received each offering a set of different proposals to those in the consultation document. Of these 27 submissions, 25 were either from a group of RCCs, single RCCs or individual Coastguard Officers with two from external organisations.

5.2 Whilst there was acceptance of the need to modernise HM Coastguard, there was less consistency in terms of organisational structure with, for instance, the number of retained RCCs varying between 6 and 15 with one submission advocating no reduction but with improved network technology.

5.3 Sixteen of these alternative proposals listed those RCCs which the authors thought should be retained.

5.4 In terms of the proposed concept of operations, there was little support for the two MOCs solution with either one or none being the most popular suggestion. This was confirmed by a lack of support for a totally national concept of operations. There was some support for a hybrid between national and territorial, but the majority preferred a territorial concept of operations. Interestingly, although there was a lack of support for a national concept of operations, there was stronger support for operational resilience on a national basis though the preference remained for resilience within different groupings which tended to support the territorial concept of operations.

5.5 Another key theme in the more substantial submissions was that the network should allow for the ready assimilation by one RCC of another's duties to allow for increased opportunities for local training events to ensure the necessary improvements in the operational standards that will underpin the modernisation programme.

5.6 Of the 22 submissions that commented on the coastal rescue proposals, the majority (14) suggested some variations to the proposed structure. The most common variation being that instead of inserting another level of management, that the resources should be used to provide direct support to current Sector Managers at a subordinate level. Six submissions supported the proposed new management structure whilst the remaining two preferred the status quo.

Alternative Proposals – Drivers for Change

5.7 There was acceptance in these alternative proposals for the need to modernise and on the assumption that the technology will allow for RCCs to be fully networked on a territorial and national basis, the biggest drivers for these alternative proposals appeared to be staff and resilience issues.

Staff Issues

5.8 Respondents expressed concern that as an organisation whose duty is to save lives or to help those in trouble at sea or on the coast, HM Coastguard can ill-afford to lose substantial numbers of experienced staff with the necessary skills and knowledge during the modernisation process. To do so may mean it would be incapable of meeting its primary duty. They also suggested that the less radical nature of the modernisation proposals contained in the alternative submissions mitigated that risk and also provided increased opportunities for career progression; increased opportunities for local training and better standards; minimum change with minimum disruption; and less need for staff to move.

Resilience

5.9 The unpopularity of the daytime RSCs was evident in most of the alternative proposals where 24 hour centres were preferred regardless of status i.e. MOC/RCC/RSC. The small increase in the number of RCCs suggested by these proposals would help to ensure that local liaison and relationships with SAR and resilience partners were maintained; that there was a RCC in each of the devolved administrations and would allow for a reasonable geographical spread of centres. Most of these proposals required the RCCs to be fully networked allowing national resilience but grouped territorially for normal operational purposes.

Alternative Proposals – Themes and Findings

Finding 27

That there is support for the modernisation of HM Coastguard.

Finding 28

Respondents felt that there was little or no supporting evidence in terms of the concept of operations to suggest that the proposals, as described in the consultation document, would deliver the stated improvements in maritime and coastal emergency response.

Finding 29

Respondents felt that there was more likelihood of success if there was an increased Coastguard presence on a 24/7 basis in geographically dispersed stations, including the devolved administrations, where there would be less disruption to staff, better retention of experience and local knowledge and better operational and technical resilience.

Finding 30

That increased specialist training opportunities would need to be made available to ensure the necessary uplift in the standards, training and overall performance that will underpin the modernised Coastguard Service.

A summary of the main attributes of the 27 alternative proposals and the Agency's modernisation plan are shown in Annex I.

Section 6

Locations

6.1 Chapter 4 of the consultation document requested particular comments or information about factors that should influence the choice for Sub-Centres in either Belfast or Liverpool, and either Stornoway or Shetland. The review established that the following factors were put forward in respect of each location.

Belfast	<ul style="list-style-type: none"> • Rise in use of marine environment • Oil exploration off the Antrim Coast • Liaison with devolved administration • Liaison with civil contingency partners • Local Knowledge and pronunciation • Grid OS not the same as the rest of UK • Closure would mean no centre in Northern Ireland • Density of shipping • The CRS could become isolated • Relationship with Eire and cross border SAR
Liverpool	<ul style="list-style-type: none"> • Responsibilities for inland waters in Lake District • Expansion of maritime activity • Density of Shipping • Co-located site with long lease • Relationship with John Moore University • Coastal destination for residents of large cities/towns
Shetland	<ul style="list-style-type: none"> • Fragility of BT Communication links • A strategic position for the UK • Expansion in oil exploration • A complex area • Cheaper to run than a MOC • Density of shipping • High levels of maritime activity
Stornoway	<ul style="list-style-type: none"> • Maintain quality of SAR on West Coast of Scotland • Remote geography and topography • Shipping density and hazardous cargoes • A complex area • Cheaper to run than a MOC • Impact on local economy • MCA owns building • Retention of experienced staff • Local knowledge and language

Section 7

Risks and Concerns

7.1 A qualitative part of the review of the responses was the identification of risks and concerns raised by the respondents. The main operational risks and concerns identified included:

Deterioration in SAR performance resulting from:

- loss of SAR experience, expertise and local awareness;
- lack of any clear, tried and tested concept of operations between MOC and RSCs and similarly between MOCs, RSCs and CRTs;
- lack of any clear and considered path for transition from territorial to national concept of operation;
- over reliance on SAR Volunteers e.g. CRS and RNLI for local knowledge, local intelligence and on scene co-ordination;
- lack of appropriate technology in CRS to facilitate revised concept of operations; and
- weakened relationships with SAR stakeholders, Devolved Administrations, Local Government and civil resilience partners.

Resource concerns included:

- insufficient staff resource to cope with base level of SAR and non SAR work streams and the increasing levels of maritime activity predicted in the consultation document;
- lack of resources to staff MOC/RSCs and to enable revised training requirement to be met;
- lack of available hours for volunteer Coastguards to undertake revised training requirements;
- inability to retain/recruit staff unless revised pay, conditions of service and adequate relocation package implemented; and
- workforce morale.

Other risks and concerns included:

- lack of confidence that network technology upgrades will facilitate the modernisation plans and be sufficiently resilient;
- loss of reputation if the proposals fail;
- operational targets not met; and
- increased burden put on industry and SAR partners.

The complete list of risks is shown at Annex K.

Section 8

Ideas

8.1 Another qualitative part of the review was to capture ideas from within the responses. These were categorised under the headings shown below with the full list of ideas shown at Annex L.

- Maritime Operations Centre (MOC) Configuration
- Other Configurations
- Coast Rescue
- Organisational Amalgamation
- Additional Workstreams and Revenue Generation
- Partnership Working
- Trials and Training
- Staffing
- Selection Criteria
- Other

Section 9

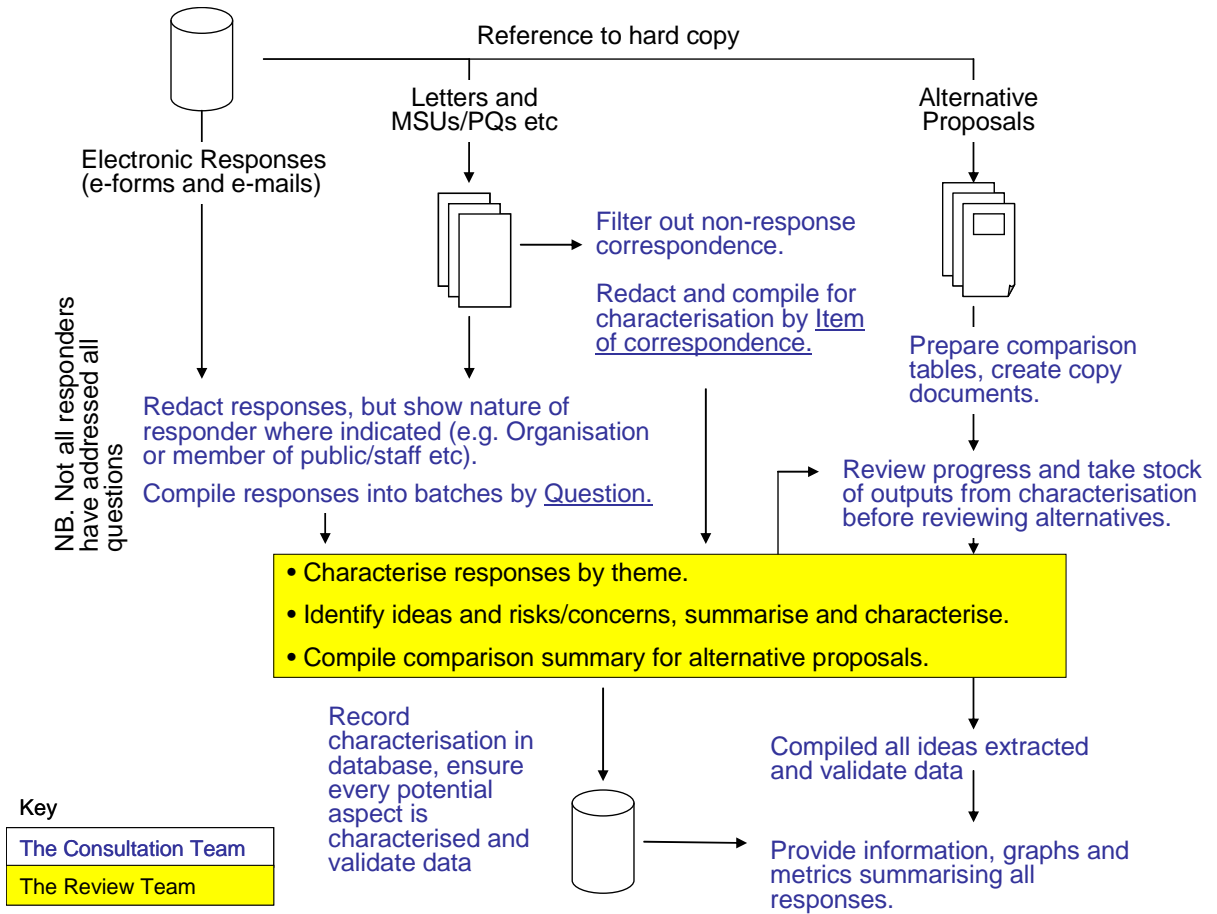
Observations

9.1 The Independent Review Team drew some observations from the responses :

- Whilst not included in the consultation document or its proposals, a number of respondents expressed concerns about the wider SAR picture and the reduction or withdrawal of VHF/DF, the Emergency Towing Vessels (ETVs), Nimrod Long Range SAR Aircraft, Maritime Incident Response Group (MIRG) and the Harmonised SAR Helicopter Force (SAR-H). Also, that any future proposals should make reference to these withdrawals and their mitigation.
- That the MCA should do more to educate the public on the role of HM Coastguard, its organisation, communications network, capability and the wider UKSAR framework.
- There was much comment concerning the 'centralisation' concept as described in the consultation document with reference to other failed Government centralisation initiatives eg Fire Service.
- That the costs of salaries, security, heating, lighting and general maintenance of daytime-only centres had not been measured against a sub-centre's operational value within the new concept of operations.
- It is evident from the responses that staff relocation will be required to maintain the highest level of experience and knowledge and the MCA may need Ministerial support to provide a satisfactory package.
- Many respondents found that the consultation document lacked sufficient detail on the proposed modernisation, in particular the concept of operations, and that the wording of the 7 set questions may have contributed to the ambiguity in many of the responses.

ANNEX A

The Review Process Schematic



Metrics

The MCA received 1,859 consultation responses, all of which were logged on receipt, allocated a unique reference number and, where possible, acknowledged by e-mail or letter. These consisted of 856 e-forms direct from the link on the MCA web site; 684 items of correspondence, 310 e-mails, many with response pro-formas as attachments, and 9 by hand. Not all responses followed the suggested response format or directly addressed the seven questions asked in the consultation document, but where it was clear that the intention was to comment on the consultation proposals, these were included. Additionally, there were 63 requests for disclosure of information which were responded to under the Freedom of Information Act as well as a number of petitions received from local pressure groups and in response to local press campaigns.

The consultation exercise also generated a surge of Parliamentary Questions and correspondence from MPs and other interested parties. These were replied to either by Ministers, the MCA Chief Executive or other officials. This flow of correspondence pre-dates the consultation and continues beyond its closure.

The 1,859 consultation responses addressed all, or some, of the seven questions asked in the consultation document, plus any other comments they might wish to make. These responses were characterised in relation to 18 possible themes giving rise to a total of 17,273 individual items of data. These themes included “no comment” because not everyone addressed all questions.

ANNEX C

The Review Team

The Team Leader invited one officer from each of 4 RCCs earmarked for closure as per the consultation proposals and 4 from RCCs earmarked to remain open. Two officers representing Coastguard Sector Managers were also invited to join the team together with one officer from MCA Headquarters and one from MCA Training Centre. A further officer representing senior coastal management to act as Deputy Team Leader was also invited to join giving a team total of 13 Coastguard Officers.

The PCS provided a further 4 Coastguard Officers who acted in their capacity as PCS Representatives and played a full and active part in the review process.

One officer from a RCC earmarked for closure was unable to attend at short notice but, on a line manager recommendation, a replacement was recommended, albeit from a RCC earmarked for remaining open but this officer, in addition to his RCC experience, brought 39 years experience as a volunteer Coastguard Rescue Officer (CRO) to the team which gave added value to the team's all round expertise.

The team comprised the following Officers –

Bob Banham, Non-Executive Director, Chair
Kevin Brown, WM Aberdeen
Peter Bullard, WM Falmouth
Paul Cardell, Training Centre
Hilary Durkan, SM Southampton
Peter Dymond, Independent Review Team Leader
Ian Graham, WO Belfast, PCS Equalities Officer
Steve Huxley, SAR Communications Manager
Val Jenkinson, SEC Vice President, PCS Rep
Steve Jones, WM Swansea
Dave Macbeth, WO Stornoway, PCS Rep
Carey Mackinnon, WO Solent
Steve Quinn, WM Aberdeen, PCS Rep
Mark Rodaway, RCCM Portland
Katherine Self, CWA Clyde
Robert Teatheredge, WM Thames
Sue Todd, CSM East SCOTNI, Deputy Team Leader
Tony Tuton, RCCM Humber
Wendy Wood, HQ CRS Team
Anne Young, SM Dornoch

MODERNISATION OF HM COASTGUARD

**REVIEWING THE RESPONSES TO THE CONSULTATION DOCUMENT
“PROTECTING OUR SEAS AND SHORES IN THE 21ST CENTURY”**

TERMS OF REFERENCE

The need for Assurance

The publication of the Coastguard modernisation document "Protecting our seas and shores in the 21st Century" on 16 December 2010 was the start of the formal consultation period concerning the proposals contained within the document. The consultation ends on 5 May 2011 and an independent in-house review team will be established to consider all responses and to examine any alternative proposals put forward weighed against the proposals in the consultation document to form a measured and rationally argued way forward.

This team will act fairly and without bias and will operate separately from the team responsible for the authorship of the consultation document.

The membership of this review team is based on the following criteria:

- That members have had no direct contribution to the concepts that underpin the modernisation proposals described in the consultation document;
- That members have a knowledge of the consultation document, the circumstances of its creation and the questions it asks (*an initial presentation of the proposals will be provided to the review team by the consultation team who will also be available to provide detailed clarification on any specific points as required*);
- That Coastguard technical members have a sound practical experience of having worked in the Coastguard organisation for at least 2 years;
- That non-Coastguard members have worked or been associated with the MCA for at least 4 years;
- That members are drawn from a range of levels and geographical locations across the service.

Governance

The team is to be appointed as a separate working team within the Consultation Programme Management structure reporting through a chairperson.

The nomination for chair will be approved by the MCA Executive Board.

The work of the team will be guided by a senior and experienced Coastguard Officer.

The team will also include representation, as necessary, from Finance and Governance, and HR.

Attitude and Behaviours

Participation on the Review team is a position of trust that carries obligations and degrees of personal accountability.

There is a requirement for team members to act with considered impartiality and objectivity in assessing the arguments and weighing the evidence presented in the consultation responses, even accounting for the possibility that they may be personally affected by any findings.

Team members must be discreet before, during and after their involvement. It is unacceptable for members to represent any section or lobby during this undertaking or report back to colleagues and line managers or publish in any way any aspect of their participation.

Information used, processed and produced by the working team will be protectively marked as per HM Government guidelines. Members of the review team will be subject to the MCA's Information Security Policy and will be subject to compliance with the Data Protection Act.

If candidates believe at any time, either before or during the Review, that they cannot conform to these professional standards of behaviour they should declare and excuse themselves from involvement without prejudice. Team members must abide by all current MCA rules including dignity at work and the Civil Service Code.

Required Outputs

The Review Team is to produce a Report for the Programme Senior Responsible Officer (SRO) which contains the following:

- An overview of the responses received and their general characteristics;
- A summary of the views expressed in respect of each of the questions asked in the consultation document; and any other significant comments made or alternative approaches suggested, either in the form of individual responses or alternative plans suggested by various groups;
- Report the Review findings to SRO of the Consultation Programme and MCA Chief Executive. *If there is disagreement within the Review team which cannot be resolved this should be documented and the recommendation made based on the judgement of the team's chairperson.*

The documentation of any unresolved disagreement should be annexed to the recommendation; there will be no publication of 'Minority Reports'.

Timing

The team will be established prior to the end of the consultation period (5 May 2011).

The existing consultation team will maintain a formal supplier/customer relationship with the Review team. It will provide the Review team with the following:

- a full contextual briefing on the proposals;
- access to any background material and information used in preparation of the proposals;
- access to all responses;
- a full statistical analysis of all responses and respondees; and
- access to specialist individuals who have contributed to the proposals, to provide further detail or explanation.

Separation of function will be maintained throughout the review process, the principal link being a neutral executive member of both teams who has had no direct input into the consultation document.

Team Members

Members of the review team will represent a spread of grades and geographical location and currently work in locations which are potentially affected in different ways by the proposals. It is anticipated that the PCS will be represented at all meetings of the Review Team.

Appendix to Annex D

Rationale for this approach

Quality assurance is generally outside the scope of PRINCE2 (Project Management Methodology) because it is the responsibility of the corporate or programme organisation in which a project sits. However, the PRINCE bible does say that it is good practice to arrange for quality assurance independent of the project management team. Also one of the senses in which the term 'Quality Assurance' is used is "the activity of reviewing a project's organisation, processes and/or products to assess independently whether quality requirements are met"

Office of Government Commerce guidance on Managing Successful Programmes (MSP) defines 'Quality Assurance' as "An independent check that products will be fit for purpose or meet requirements"

The Department for Business Innovation and Skills Code of Practice on Consultation

All responses (both written responses and those fed in through other channels such as discussion forums and public meetings) should be analysed carefully, using the expertise, experiences and views of respondents to develop a more effective and efficient policy. The focus should be on the evidence given by consultees to back up their arguments. Analysing consultation responses is primarily a qualitative rather than a quantitative exercise.

In order to ensure that responses are analysed correctly, it is important to understand who different bodies represent, and how the response has been pulled together, e.g. whether the views of members of a representative body were sought prior to drafting the response.

Consultation documents should, where possible, give an indication as to the likely timetable for further policy development. Should any significant changes in the timing arise, steps should be taken to communicate these to potential consultees.

Following a consultation exercise, the Government should provide a summary of who responded to the consultation exercise and a summary of the views expressed to each question. A summary of any other significant comments should also be provided. This feedback should normally set out what decisions have been taken in light of what was learnt from the consultation exercise. This information should normally be published before or alongside any further action, e.g. laying legislation before Parliament.

Those who have participated in a consultation exercise should normally be alerted to the publication of this information.

Consideration should be given to publishing the individual responses received to consultation exercises.

TERMS OF REFERENCE

INTERNAL QUALITY AUDIT OF THE INDEPENDENT REVIEW OF RESPONSES TO THE FUTURE COASTGUARD CONSULTATION

Directorate(s): FINANCE & GOVERNANCE

Director: SUE KETTERIDGE

Audit objective

To provide assurance that the collection and review of the responses to the consultation document “Protecting Our Seas and Shores in the 21st Century” has been carried out in accordance with HM Government’s Code of Practice on Consultation, that all responses (both written responses and those fed in through other channels such as discussion forums and public meetings) have been taken into account and analysed, and that the resulting report and recommendations to the MCA Executive Board are an accurate reflection of those responses.

Audit criteria

2. The criteria against which the process will be audited are:
 - HM Government’s Code of Practice on Consultation
 - Response Review Team Terms of Reference
 - ISO 9001:2008 Standard – Quality Management System Requirements.

Audit scope

3. The audit will examine the MCA’s process for reviewing the responses received to the Coastguard modernisation document following the completion of the formal consultation period on 5 May 2011. This includes:
 - The methodology used to examine and categorise responses
 - The composition and operation of the team undertaking the review of responses
 - The delivery of the required outputs from the review team’s terms of reference

Audit approach

4. The audit will be carried out in an objective and impartial manner, through discussion with key contacts, examination of relevant documents and files, and by sampling the responses received to ensure they have been accurately recorded.

5. Any emerging findings will be discussed with management during the audit. At the end of fieldwork, a closing meeting will be held to present findings, confirm factual accuracy and agree corrective actions. Following this meeting, a draft report will be issued for final comments prior to issuing the final report.

6. The proposed timetable of events is:

Opening Meeting	
Start of fieldwork:	16 th May 2011
Completion of fieldwork:	Dependant on review timescale
Closing meeting held:	tbc
Draft report issued:	[10 working days after closing meeting]
Auditee response:	[10 working days after draft report issue]
Final report issued:	[5 working days after auditee response]

9. The audit team consists of:

Lead Auditor:	Steve Horn, Lead Auditor, CG&R
Auditor(s):	Yvonne Whitworth, Lead Auditor , CG&R

10. Key Contacts:

Bob Banham	Non-Executive Director and Chair of Review Panel
Peter Dymond	Review Team Manager
Andrew Austin-Hancock	Head of Research & Planning

NB: The planning, scope, approach and timetable set out in these terms of reference may change in the light of preliminary findings. Any significant changes will be discussed with the Director of Finance & Governance and key contacts as appropriate.

Steve Horn
Technical Risk Assurance Lead Auditor
Corporate Governance & Risk

ANNEX F

INTERNAL QUALITY AUDIT OF THE INDEPENDENT REVIEW OF RESPONSES TO THE FUTURE COASTGUARD CONSULTATION

The reporting and analysis of the responses to the consultation document “Protecting Our Seas and Shores in the 21st Century” was audited by an independent team, comprising ISO 9001:2008 lead auditors from the MCA’s Corporate Governance and Risk Division. The purpose of the audit was to ensure that the review and analysis of responses was carried out in accordance with HM Government’s Code of Practice on Consultation, that all responses (both written responses and those fed in through other channels such as discussion forums and public meetings) were taken into account and analysed, and that the resulting report to the MCA Chief Executive was an accurate reflection of those responses.

Terms of reference for the audit were agreed with the independent chair ahead of the review process.

The audit included observation of the team undertaking the analysis of the responses, discussion with key contacts, and 10% sampling of the responses received through the data capture and analysis tool.

The audit team are able to give the following assurance:

1. The composition and operation of the Review Team met the requirements for independence and impartiality, and the analysis and discussion of responses was undertaken objectively.
2. The methodology used to capture, examine and categorise responses, was robust and ensured that all responses were considered.
3. The resultant Report is a fair and accurate representation of the views expressed through the consultation process, and meets the required outputs from the terms of reference,

Steve Horn
Technical Risk Assurance Lead Auditor
Corporate Governance & Risk
Maritime & Coastguard Agency

Consultation Questions

Q1. 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.

Q2. 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.

Q3. 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.

Q4. 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. Do you agree with the proposals for the location of these Centres and sub-centres? Please provide supporting reasons for your comments.

Q5. 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.

Q6. 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.

Q7. 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.

The consultation Document also invited respondees to provide comments on the proposed modernisation which were not covered by the above questions.

ANNEX H

Characterisation Descriptors

LK: Knowledge of the local area, knowledge of local place names, knowledge of local anomalies and environment. Situational awareness.

LI: Local Intelligence: Knowledge of resources and useful contacts; their capabilities and limitations. Dynamic information which is known about locally but not further afield.

LN: Language - Local dialects, language and pronunciation.

LE: Local resilience planning. Maintaining SAR Partner and stakeholder relationships.

ConOps: Anticipated concept of operations, (e.g. working practices between MOC and sub-centres), roles and operational procedures. Selection of centres and hours of operation.

Com: Complexity – Periods of high incident workload versus fewer but equally resource intensive, complex individual incidents

Eco: Economy - Impact on jobs, tourism and the local economy

Res: Resourcing - Comments about resourcing; retention of sufficient experienced staff and impact on training and leave.

Peps: People - Watch patterns, terms and conditions, overtime, relocation and redundancy policy.

CRS: Comments regarding the reliance on, or additional tasks expected of, the volunteer Coastguard Rescue Service. Comments on proposed new Sector Organisation; on scene co-ordination of 'dry' incidents.

Tech: Technology - Comments about future technical resilience and reliability, networking arrangements or existing systems.

Info: Information - Comments about the lack of information or detail in the consultation document.

Mis: Misunderstanding - Comments which indicate a lack of understanding of the role, organisation, capability and communications of the Coastguard or how the proposals relate to the operations room staff.

Amb: Ambiguous - The response does not address the question.

NoCo: No comment – no response to a question.

OC: Operational communications between MOC and sub centres. How will the communication work, how will telephone calls be handled and transferred, how will radio traffic received at one site be passed to the other. How will MOCs and sub Centres communicate with CRS and other resources.

Rec: Comments regarding the effect of the proposals on non-SOLAS recreational craft and other leisure activities as opposed to larger commercial vessels.

Cost: Comments on costs; where costs can be saved.

Summary of alternative proposals

Title	Total Staffing (SAR Co-ord, Coastal & HQ)	Staffing: SAR Co-ordination	Staffing: Coastal Response	Staffing: HQ	Number of Centres	Centres Closing	Centres Remaining	Risk Assessment?	Using MOC Concept	Concept of Ops	Delivery of SAR, VTM and CP	Resilience	Coastal Response	Drivers
Consultation - Protecting our Seas and Shores in the 21st Century	370	248	105	17	9	Clyde Forth Shetland or Stornoway Belfast or Liverpool Holyhead Milford Haven Brixham Thames Yarmouth Portland Solent	MOC South (So'ton/Portsmouth) MOC North (Aberdeen) Dover Falmouth (Day only) Swansea (Day only) Humber (Day only) Shetland or Stornoway (Day only) Belfast or Liverpool (Day only) London	Y	Y	National	Yes	National	Consultation Proposals	Establishing a single national network strategically controlled by Maritime Operations Centres. Deployment of a workforce matching seasonal and diurnal workloads. Higher skilled and therefore higher paid Coastguards. Enhanced operational leadership in the Coastguard Rescue Service.
A Safer Future - Falmouth	460	338	102	17	11	Brixham plus one centre from each of the existing pairs of centres except that Stornoway and Shetland remain open.	Stornoway Shetland London (24 hour) Falmouth The remaining half to remain open. Would also be 24 hour.	Y	N	Territorial	Yes	National	Consultation Proposals	Geographic spread of centres. A more realistic alternative based on staff retention and expertise. 24 Hour centres resulting in more resilience. Falmouth reason being their unique international expertise.

Title	Total Staffing (SAR Co-ord, Coastal & HQ)	Staffing: SAR Co-ordination	Staffing: Coastal Response	Staffing: HQ	Number of Centres	Centres Closing	Centres Remaining	Risk Assessment?	Using MOC Concept	Concept of Ops	Delivery of SAR, VTM and CP	Resilience	Coastal Response	Drivers
Belfast, Humber and Swansea	Not stated	318	Not stated	Not stated	11	Clyde Forth Yarmouth Thames Solent (see NMOC) Portland Brixham Milford Haven Holyhead	NMOC Southampton Aberdeen (MRCC) Swansea (MRCC) Humber (MRCC) Belfast (MRCC) Dover (MRCC) London (MRSC) Shetland (MRSC) Stornoway (MRSC) Liverpool (MRSC) Falmouth (MRSC)	Y	Y	Hybrid	Not Stated	National	Consultation Proposals	Devolved administrations will be well served. This proposal could be implemented earlier than MCA approval. Better retention of existing staff/expertise. Improved career progression. Increased training and higher standards. Two additional centres selected to increase MCA presence/local liaison. Desire for all remaining centres to be 24/7.
RAP Plan	Not stated	Not stated	Not stated	Not stated	15	4 centres but not named.	A new Highcliffe Coastguard. Solent and Portland combined. Stornoway, Shetland, London, Dover, Falmouth plus 9 others which were not mentioned but 24hr centres.	Y	N	Territorial	Yes	New Grouping	Alternative	Minimum change possible with minimum disruption.

Title	Total Staffing (SAR Co-ord, Coastal & HQ)	Staffing: SAR Co-ordination	Staffing: Coastal Response	Staffing: HQ	Number of Centres	Centres Closing	Centres Remaining	Risk Assessment?	Using MOC Concept	Concept of Ops	Delivery of SAR, VTM and CP	Resilience	Coastal Response	Drivers
Why Thames	Not stated	Not stated	Not stated	Not stated	10	Yarmouth Brixham Holyhead Milford Haven Forthh/Clyde/Shetland/Stornoway Solent Portland Brixham Liverpool or Belfast	MOC North at Aberdeen MOC South Humber Dover London Thames Falmouth Swansea Liverpool or Belfast Stornoway or Shetland	N	Y	Hybrid	Yes	Not Stated	Not Stated	As the 3rd busiest centre in the UK the author believes Thames should be retained as a day centre. This is supported by information on the Sunk VTS, Ship to Ship Transfers, Anchorage, density of shipping and large numbers of recreational craft
A Case for 6 24hr Stations in the UK	Not stated	243	Not stated	Not stated	6	Shetland Forth Clyde Belfast or Liverpool Holyhead Swansea Milford Haven Falmouth Brixham Portland Solent Yarmouth Thames	Stornoway Aberdeen (or new NE Scotland build) Belfast or Liverpool Humber Southampton/Portsmouth new build Dover	N	N	Territorial	Not Stated	New Grouping	Not Stated	Keeping Stornoway open. Reducing travel viz a viz training/meetings therefore cost saving. MOC Concept flawed.
Protecting our Maritime and Coastal Environment	417	278	120	19	10	Not specified. But one centre to be retained in the NW & NW area.	Not specified. But one centre to be retained in the NW & NW area	N	N	Hybrid	Yes	New Grouping	Alternative	Need for retention of centre in the NW & NW Area. Lack of resilience in current proposal. Dissolution of MCA Regions.

Title	Total Staffing (SAR Co-ord, Coastal & HQ)	Staffing: SAR Co-ordination	Staffing: Coastal Response	Staffing: HQ	Number of Centres	Centres Closing	Centres Remaining	Risk Assessment?	Using MOC Concept	Concept of Ops	Delivery of SAR, VTM and CP	Resilience	Coastal Response	Drivers
Aberdeen Coastguard	Not Stated	370	Not Stated	Not Stated	9	Shetland Forth Yarmouth Thames Solent Portland Brixham Swansea Holyhead Liverpool Clyde Highcliffe	Aberdeen Southern MOC Stornoway Belfast Humber Falmouth Dover Wales London All 24/7	Y	N	Hybrid	Yes	National	Alternative	An evolutionary approach to the MCA proposal in order to mitigate key risks and increase staff support. Controlled transition period over 5 years. Maintenance of national 24/7 approach to reduce the majority of risks within the current MCA proposal for MOC operational infrastructure.
Alternative Organisation al Structure of HM Coastguard - Plan B	Not stated	270	Approx 90	Not stated	10	Not stated	Not stated	N	N	Territorial	Not Stated	New Grouping	Consultation Proposals	Retain regional resilience and concept of operations. Improves career opportunities. Strengthen regional resilience and training.

Title	Total Staffing (SAR Co-ord, Coastal & HQ)	Staffing: SAR Co-ordination	Staffing: Coastal Response	Staffing: HQ	Number of Centres	Centres Closing	Centres Remaining	Risk Assessment?	Using MOC Concept	Concept of Ops	Delivery of SAR, VTM and CP	Resilience	Coastal Response	Drivers
Resilience is Futile - An Alternative Proposal	Not stated	Not stated	Not stated	Not stated	10	Not stated Close one of each existing pair of centres except Stornoway/Shetland which should remain open.	Not stated Retain one of each pair including Stornoway and Shetland and pass of London CG to the PLA.	N	N	Territorial	Not Stated	National	No tStated	Retain area concept with one MRCC from each existing pair. Networked MRCCs allowing full national resilience ie no MOC. Retention of more experienced staff providing greater resilience and retaining local knowledge. Senior officers would not be required to work shifts. No options provided in the MCA proposal.
Future of the Coastguard - Alternative Proposal	Not stated	Not stated	Not stated	Not stated	15	Not stated	Not stated Fifteen not named except London	N	N	Territorial	Not Stated	National	Alternative	Retain local knowledge expertise and increased resilience. Removal of SMs and CWA grade.
Response to Consultation	Not stated	Not stated	Not stated	Not stated	9 or 11	Not stated	Not stated but 24/7 for those remaining open	N	Y	Territorial	Yes	National	Consultation Proposals	Cost savings through less people, less centres, better rewards.

Title	Total Staffing (SAR Co-ord, Coastal & HQ)	Staffing: SAR Co-ordination	Staffing: Coastal Response	Staffing: HQ	Number of Centres	Centres Closing	Centres Remaining	Risk Assessment?	Using MOC Concept	Concept of Ops	Delivery of SAR, VTM and CP	Resilience	Coastal Response	Drivers
An individual member of MCA staff	Not Stated	250	Not Stated	Not Stated	11	Clyde Aberdeen Yarmouth Thames Holyhead Brixham Portland Milford Haven	Belfast Stornoway Shetland Forth Humber Swansea Liverpool London Dover Solent Falmouth All 24/7	N	N	Territorial	Not Stated	New Grouping	Consultation Proposals	Resilience. Cost cutting by retention and use of MCA Estate and not build new. Retention of 24/7 centres. Preservation of job satisfaction of CG Officers. Keeping it local.
A Possible Future of HM Coastguard	Not Stated	Not Stated	Not Stated	Not Stated	13	Swansea All Regional Business Units Holyhead Clyde Solent Portland	One national business unit ie no Regions Highcliffe Liverpool Brixham Falmouth Milford Belfast Stornoway Shetland Aberdeen Humber Thames London Dover	Y	N	Territorial	Not Stated	New Grouping	Alternative	As little change as possible to the existing system.
An Alternative Proposal	Not stated	314	78	Not stated	11	Not stated - but geographical spread	London Dover Plus 7 Others all 24/7 Plus 2 "MOCs"	N	N	Hybrid	Yes	New Grouping	Alternative	24/7 centres. Resilience. Increased pay levels.

Title	Total Staffing (SAR Co-ord, Coastal & HQ)	Staffing: SAR Co-ordination	Staffing: Coastal Response	Staffing: HQ	Number of Centres	Centres Closing	Centres Remaining	Risk Assessment?	Using MOC Concept	Concept of Ops	Delivery of SAR, VTM and CP	Resilience	Coastal Response	Drivers
An individual member of MCA staff	Not Stated	376	Not Stated	Not Stated	9	Portland Brixham Milford Haven Liverpool Clyde Forth Thames Humber London Training Centre	Solent Falmouth Swansea Holyhead Belfast Aberdeen Dover Shetland Stornoway All 24/7	N	N	Territorial	Yes	National	Alternative	Less risk, low cost proposal to maintain 24/7 cover at a National Network of MRCCs with enhanced duties, but no MOCs within UKSRR.
MRCC Shetland and MRCC Stornoway	Not Stated	Not Stated	Not Stated	Not Stated	13	Not stated	3 in Scotland ie Shetland, Stornoway and Aberdeen 2 on East Coast of England Belfast and London 3 Wales and West 3 in South which includes Dover	Y	N	Territorial	Not Stated	National	Alternative	Minimum change but some modernisation. The national network would be in support of the MRCCs not a replacement.
MRCC Holyhead	Not Stated	Not Stated	Not Stated	Not Stated	19	Nil	19	N	N	Territorial	Yes	Current Pairing	Current	Status quo taking advantage of current technology upgrades. Additional cost savings identified by employing staff more efficiently.

Title	Total Staffing (SAR Co-ord, Coastal & HQ)	Staffing: SAR Co-ordination	Staffing: Coastal Response	Staffing: HQ	Number of Centres	Centres Closing	Centres Remaining	Risk Assessment?	Using MOC Concept	Concept of Ops	Delivery of SAR, VTM and CP	Resilience	Coastal Response	Drivers
A Logical Plan for the Future	Not Stated	Not Stated	Not Stated	Not Stated	14	Not stated Up to 5	Not stated Minimum of 14 to include Stornoway, Shetland, London, Dover and Falmouth Combine Portland, Solent and MCA HQ - All remaining centres 24/7	N	N	Territorial	Yes	Not Stated	Alternative	Expand MCA responsibilities to cover air/land and Maritime SAR and to include additional surveillance, security and enforcement functions. Disband Regions. Give ownership and responsibility to people at the front end. Those involved in development of the consultation proposal should not have any involvement in the determination of the final set up.
An individual member of MCA staff	Not Stated	304	Not Stated	Not Stated	8	London Liverpool Brixham Portland Milford Haven Holyhead Clyde Shetland Forth Thames Yarmouth	Dover Solent Falmouth Swansea Belfast Stornoway Aberdeen Humber All 24/7	N	Y	Territorial	Yes	New Grouping	Not stated	Optimum team size to deliver efficient service. A more staged approach to change to ensure resilience.

Title	Total Staffing (SAR Co-ord, Coastal & HQ)	Staffing: SAR Co-ordination	Staffing: Coastal Response	Staffing: HQ	Number of Centres	Centres Closing	Centres Remaining	Risk Assessment?	Using MOC Concept	Concept of Ops	Delivery of SAR, VTM and CP	Resilience	Coastal Response	Drivers
The Middle Way	Not Stated	252	Not Stated	Not Stated	11	Not stated	Dover (24/7) Southern (24/7) Falmouth (24/7) Swansea (24/7) NW Irish Sea ie Liverpool, Clyde or Belfast) (24/7) Aberdeen (24/7) Humber (24/7) Brixham or Portland (day centre) 2 Scottish Day stations Thames or Yarmouth (day centre)	N	N	Territorial	Not Stated	New Grouping	Current	Enhance what structure already exists with minimum change.
An individual member of MCA staff	Not Stated	360	78	Not Stated	13	Not stated	Not stated London plus 10 others plus 2 MOCS	N	N	Hybrid	Yes	New Grouping	Alternative	24/7. Resilience. Increased pay levels.

Title	Total Staffing (SAR Co-ord, Coastal & HQ)	Staffing: SAR Co-ordination	Staffing: Coastal Response	Staffing: HQ	Number of Centres	Centres Closing	Centres Remaining	Risk Assessment?	Using MOC Concept	Concept of Ops	Delivery of SAR, VTM and CP	Resilience	Coastal Response	Drivers
MRCC Clyde	Not Stated	292	Not Stated	Not Stated	13	Forth Yarmouth Portland Solent Brixham Milford Haven Holyhead	Stornoway Shetland Aberdeen Humber Liverpool Thames Belfast Dover Clyde MOC Southampton Falmouth London Swansea	N	N	Territorial	Yes	New Grouping	Consultation Proposals	Retain MRCC Clyde. UK to have recognised MOC. Each devolved administration to have MRCC. Even distribution of workload. Vulnerability of telecom systems to Scottish Island centres. International work to be carried out at MOC. London CG linked to MOC. Wrong criteria chosen for MOC location selection.
Liverpool Coastguard	Not Stated	350-490	Not Stated	Not Stated	15	Not stated	Not stated but 24/7	N	N	Territorial	Yes	New Grouping	Alternative	Retain frontline staff. Reduce non-operational roles. Greater resilience. Efficiency Savings and opportunities for income generation.

Title	Total Staffing (SAR Co-ord, Coastal & HQ)	Staffing: SAR Co-ordination	Staffing: Coastal Response	Staffing: HQ	Number of Centres	Centres Closing	Centres Remaining	Risk Assessment?	Using MOC Concept	Concept of Ops	Delivery of SAR, VTM and CP	Resilience	Coastal Response	Drivers
The Outer Hebrides Community Planning Partnership	Not Stated	Appro x 264	Not stated	Not stated	12	Clyde Forth plus English and Welsh)	Stornoway Shetland Aberdeen Belfast plus other - All 24/7	Y	N	Territorial	Not Stated	New Grouping	Not Stated	24/7 Operations. "Politically acceptable." Resilience. Public Confidence. Enhance safety of coastal users and mariners.
An individual member of MCA staff	Not Stated	Not Stated	Not Stated	Not Stated	12	Not stated Up to 7 closed	Not stated Minimum of 12	N	N	Territorial	Yes	New Grouping	Alternative	Staff must be involved in the construction of the FCG Plan. Suggests MCA should lease parts of buildings to other agencies.
PCS Response to the Consultation	Not Stated	Not Stated	78	Not Stated	14	Not Stated	Not stated - All 24/7	Y	Y	Hybrid	Yes	National	Alternative	Staff issues are main drivers in this alternative proposal.
Alternative Proposal by PCS Members of Thames CG	Not Stated	248	Not Stated	Not Stated	15	Not stated	Not stated - All 24/7	N	N	Territorial	Yes	New Grouping	Alternative	No clear driver.

Common themes of concern by group of respondent

	Local Knowledge	Local Intelligence	Language/Dialect	Local Liaison and Resilience	Concept of Operations	Complexity vs Multi Incident Workload	Local Economy	Resourcing	People Issues	Coastguard Rescue Service	Technology	Insufficient information in consultation document	Misunderstanding of Coastguard role or capability	Ambiguous i.e. did not address modernisation issues	Operational Communications	Recreational Users	Cost	Totals	Percentage
Small to Medium Enterprise (up to 50 employees)	117	60	33	24	116	13	17	39	28	36	42	12	30	67	10	30	39	713	4%
Large Company	55	22	6	49	67	14	16	27	14	24	29	20	13	33	6	7	17	419	2%
Representative Organisation	164	75	34	58	194	21	20	69	32	73	106	47	41	75	19	65	52	1145	7%
Trade Union	20	3	1	5	8	1	1	2	3	3	5	4	17	1	0	3	5	82	0.5%
Interest Group	106	39	23	21	78	8	10	34	23	33	33	17	31	55	11	22	24	568	3%
Local Government	224	114	34	91	215	27	65	61	35	62	125	45	40	44	19	56	69	1326	8%
Central Government	76	42	18	53	71	7	25	35	29	31	31	14	16	8	10	23	23	512	3%
Other Emergency Service (Police/Fire/Ambulance)	59	34	15	76	83	9	9	31	9	26	26	13	8	28	7	2	10	445	3%
Member of MCA Staff	255	146	45	144	365	52	42	236	222	163	222	92	27	58	60	80	105	2314	13%
Member of a Coastguard Rescue Service	70	45	20	28	77	9	6	57	31	77	51	10	17	33	15	14	17	577	3%
Member of the Public	1463	632	332	371	1304	144	263	455	272	415	530	151	362	766	108	372	451	8391	49%
Other	106	57	14	50	89	6	14	51	20	36	38	14	31	50	15	22	26	639	4%
None Shown	24	5	9	7	27	4	4	12	11	5	19	6	1	1	2	2	3	142	1%
Totals	2739	1274	584	977	2694	315	492	1109	729	984	1257	445	634	1219	282	698	841	17273	100%
	16%	7%	3%	6%	16%	2%	3%	6%	4%	6%	7%	3%	4%	7%	2%	4%	5%	100%	

Where interest in single subject is greater than 5% of total interest in all subjects

The matrix shows the majority interest for members of the public was Local Knowledge/Local Intelligence and Concept of Operations, with a significant instance of Ambiguous comments. For members of staff the Concept of Operations was a common theme, as was Local Knowledge, Resourcing, People Issues and Technology.

RISKS AND CONCERNS LOG

Risks and Concerns - Operations
Cost cutting exercise that is neither value for money nor values a life;
Deterioration in Search & Rescue (SAR) response - loss of local knowledge leading to delays in, or inappropriate, tasking; complexity of on-scene co-ordination and CRT/RCC/MOC relationship leading to breakdown in process; fragmented command, control and co-ordination; distance to travel for Coastal Safety Officer if required to attend coastal incident could lead to delay in on scene supervision.
Transition from proven territorial concept of operations to unproven national version.
Proposals are commercial shipping centric and do not address challenges of non Solas vessels <300gt/coastal and recreational users who may not have the on board technologies referred to in the consultation document.
Potential deterioration in SAR performance generally due to combined effects of modernisation proposals together with loss or reductions in MIRG, ETV, Nimrod, SAR H.
Potential inferior operational interface between MOC/RSC and CRS/SAR Partners.
Not enough Maritime Operations Centres.
Over reliance on Coastguard Rescue Service - volunteers only; high demands already made on them; new roles requiring additional training; effects on employers and families; inconsistent local knowledge.
Reduced number of RCCs leading to loss of local knowledge.
The reduction in number of RCCs operational at night with some daytime only centres : - inability to deal with the 30% of incidents that happen after 1900; - the creation of a two tier structure ie MOCs and daytime sub centres - worsening of skills fade; - handover between MOC and daytime sub centres.
Before transition from current to new proposed structure, the concept of operations, associated processes and the technology need to be proven.
Weakened relationships with Devolved Administrations, Local Govt. & Civil Resilience partners.

Risks and Concerns - Staff
That non-SAR tasks, support to wider emergency response and the forecast increase in maritime activity and incidents (as predicted by the consultation document) not taken into account when establishing staff numbers.
Any deterioration in SAR response could increase the potential for prosecutions under Corporate and Personal liability legislation.
Current training for Coastguards and Coastguard Rescue Service Volunteers not adequate for new proposals.
Development of proposal/consultation process has not engaged staff/stakeholders appropriately.
Experienced staff unwilling/unable to relocate because of family commitments in current location or high cost of living in MOC/RSC areas.
Health and Safety of coastal full time and volunteer Coastguards - lone working; lack of team support; lack of appropriate technology.
Inability to effectively recruit and/or retain full time and volunteer Coastguards for reasons already stated within this risk log.
Insufficient admin support.
Lack of staffing resilience/flexible hours - inability to field senior staff in major incidents.
Reduction in workforce morale.
Adding a bureaucratic layer of management to CRS management when support at the base layer is more important.

Risks and Concerns - Other
Increased burden on Industry and SAR Partners.
Loss of reputation if proposals fail.
MOCs/SCs remote from communities, stakeholders and incidents.
Modernisation effects result in operational targets not met.
Fewer collection points available for Time Expired Pyrotechnics.
This is a cost cutting exercise providing neither value for Money nor valuing human life.
Inability to deal with the challenge posed by the Offshore Oil, Gas & Renewable Energy industries.

IDEAS LOG

Maritime Operations Centre (MOC) Configuration Ideas
1 MOC only
2 MOCs appear sufficient, why so many sub centres
2 MOCS is "all eggs in one basket"
4 MOCs Aberdeen, Humber Solent and Liverpool - 5 Sub centres Falmouth, Swansea, Belfast, Stornoway and Shetland - 24hr at Dover, London and Thames.
4 MOCs linked plus sub centres parented by a MOC
3 MOCs - 1 in Scotland, England and Wales - with evenly spread sub-centres
3 MOCs Aberdeen, Falmouth and Dover
3 MOCs for greater resilience
3 MOCs including Falmouth
4 MOCs including Falmouth
2 MOCs but linked together and into a national network of 24/7 centres.
2 MOCs plus 24/7 sub-centres
A MOC should be based near Felixstowe due to: Largest container port in Europe, Levels of commercial leisure activity
Agree to MOC concept - subject to technological support (suggest purchase of "off the shelf" not state of the art) and backed up with a clear redundancy programme that allows for a retention of experience.
Alternative proposal to place Southern MOC at Falmouth.
Central belt MOC to allow full training facilities, therefore allowing cost saving as trainers can attend one big station negating the need for training centre
Consider use of RNAS Culdrose as a future MOC if expansion of Falmouth not possible
Consult locally for MOC/Sub-Centre location
Dover as 3rd MOC to increase resilience
Dover or Brixham as 3rd MOC - already meet building criteria
Establish 3 MOCs to cater for East and South Coast (No mention of west coast). Other stations to run as day stations thus installing confidence and support within local communities
Establish a MOC at Dover with sub centres at Swansea, Falmouth, Lee on Solent and Humber. MOC at Aberdeen with Northern centres as proposed
Establish two MOCs and a number local sub centres using modern info technology intelligently
Introduce a 3rd MOC for greater resilience - Clyde due to location.
Irish Administration proposal for 2 MOC concept currently in place in Dublin to be investigated
Locate a MOC in Wales
Locate a MOC in Wales (plus one other sub-centre)
Locate MOC in area of Portsdown Hill (Crown Estates property) to provide greater resilience against natural disasters
Locate MOC South at Swansea due to: Travel Links (Airport, M4 and Rail), existing building can be modified, substantial Maritime Risks in Wales and 24/7 MOC would compliment Welsh Government functions
Locate MOC South further North and more central eg Leeds
Locate MOCs in less expensive areas
Locate the MOC at Weymouth
MOC should be established at Daedalus
MOC South - New Build Southampton - Remaining stations carrying on in existing locations
MOC South at Dover
Move from pairing stations to triples (9 plus 3 MOCs)
Northern MOC to be moved to the central belt to allow better access to government departments (national and devolved) and with better transport links
Proposal for 2 MOCs only in NW UKSAR area. Clyde and Crosby and two additional sub centres in Northern Ireland and North Wales

Maritime Operations Centre (MOC) Configuration Ideas
Proposal for Swansea to become a MOC rather than Solent
Propose 2 MOCs for Scotland (No comment on other areas)
Propose 2 MOCs plus more sub centres
Propose 3 x 24/7 sites (Aberdeen, Dover and Falmouth)
Propose 4 main centres - Falmouth, Liverpool or Holyhead, Stornoway, Humber (Hull). Users would be less than 400 miles from a centre - Redundancy for failure
Propose 4 MOCs - Scotland (1) England East, West and South. Each MOC supported by two sub centres working 12 hour days
Propose 4 MOCS - North, South, East and West
Propose 4 MOCS - North, South, East and West. Supported by geographically strategic sub centres (Falmouth, So'ton, Aberdeen, Belfast or Liverpool)
Propose an alternative MOC site at Weymouth
Propose Liverpool as MOC, based on freehold property and co-located property
Propose the establishment of 7 MOCs geographically distributed and interconnected - Suggested sites - Shetland, Stornoway, Belfast, Falmouth, Dover, Humber, Aberdeen
Reduce the tactically and strategically unnatural division of SAR from Counter Pollution by including the latter expertise in the MOCs
Respondent questions the need to incur the additional costs in building a new MOC in the south. Suggests utilizing an established station and to introduce the technology to that station
Retain Aberdeen as a MOC
Retain Clyde as Northern MOC
Set up Area specific desks in MOCs to help with local knowledge and to alternate staff as required.
MOC (Open 24/7) in each MCA region
MOC to act as back up to RCCs.
Site MOCs inland to save money
SOSREP, Deputy SOSREP and the Counter Pollution team to be based at a MOC.
Staff in MOCs should rotate between working in MOCs and on the coast to increase their own local knowledge. Mini local stations should be set up within the MOCs
Support for proposal but more sub-centres required
Three MOCs - Southampton, Falmouth and Stornoway/Orkney subject to transitional risks
Triangular MOC arrangement - Aberdeen, Dover, Brixham
Two MOCs may be sufficient but include Falmouth because of expertise covering responses deep into the Atlantic.
Two MOCs one located at MRCC Falmouth
Two MOCs Southern one located at Falmouth. Aberdeen and Dover should also be retained
Weymouth and Portland council suggest a number of sites in their area for a future Southern MOC. Also arguing that it is a major centre of Maritime activity
Combine Solent/Portland or a MOC at Spring Place HQ
Suggest 1 MOC giving support to 9 24/7 stations and London. (Including one in each devolved admin)
Ensure MRCC/MOC is retained in NW England to ensure cover in Eastern Irish Sea
1 MOC in Southampton: MRCC Clyde - has MCA enquired about future of Navy buildings with DIO (Defence Infrastructure Organisation) locate Scottish MOC in central belt alongside Police and Fire
minimum requirements for MOC should be 3
MOC would operate as an MRCC

Other Configuration Ideas
24/7 centres give staff fairer recruitment and progression opportunities. They retain and develop local knowledge and expertise. They should sustain/develop links with civil contingency groups, creates strong links between MRCCs and Local CRS
4 South coast stations - Dover, Solent, Brixham, Falmouth due to volume of maritime activity. Better connections would enable a reduction in staff numbers
7 x 24/7 Centres
9 Networked 24/7 centres (to reduce risk of daytime/night time non face to face handovers)
9 or 10 Stations - Linked to either side flank station
A more evenly distributed spread of 24/7 RCCs and personnel across a wider network to provide a more resilient structure.
A multi linked station approach by upgrading the networks of existing centres would have increased resilience
A network with more connected nodes would be more resilient to failure
A suggestion for a proposed single command and control platform encompassing all areas of the proposal
After RER project, stations will be linked sufficiently providing greater interoperability
Agreed to centralised 999 call centre but localised geographical co-ordination
All 18 current station should be linked
Alternative sites for Portland - Southwell Business Park (Defence Research Agency former site)
Close one RCC in each current pair leaving 9 networked centres plus London.
Amalgamate Clyde, Forth and Aberdeen into one super station in the central belt
Beneficial to have the higher grade roles available on an on-call 24/7 to assist multi-agency partners with their specialist knowledge outside sub-centre hours. Preference for all sub-centres to be 24/7
Bottom up approach. If roles are changing locations could be out of physical proximity to the sea.
Call centre in India
Choices should be Falmouth vs. Swansea and Falmouth vs. Dover rather than choosing between stations which are so far apart
Combine some centres to cover the south coast
Establish 18 (or thereabouts) networked centres without the need to build, equip and staff the new MOCs. Such a system would be highly resilient and flexible
Existing sub-centres to be maintained
Fewer but all 24hr Centres more robustly linked to each other. Begin with current 18 MRCCs and integrate less busy into more busy gradually to reduce risk of losing experience
Fewer stations but each being 24 hour stations to provide the local knowledge
Given better networking of existing sites, staff could be (and should be) distributed among existing sites
Group Stations in threes
Have on-call response staff to man up MRCCs 24/7
If risk and demand are increasing then number of stations should be increased not reduced
Improve Connections between existing stations
Interlock current stations to provide better resilience
Keep all sub centres to retain coordination of local incidents
Keep Belfast 24 hr cover due to increased activity regarding oil exploratrion off Antrim coast
Link Existing stations
Linking of existing MRCCs using more modern technology to improve communication eg. Given as www
Local incidents should be dealt with by local centres and passed to national centres for major incidents
London can be closed and subsumed by Thames and Dover
London CG to close and duties transferred to MOC
London should be a tide based service (?). Humber should be a 24/7. Dover functions (CNIS) moved to Southampton
Maintain and enhance existing service

Other Configuration Ideas
Maintain current infrastructure, but flexible manning at night
Maintain MRCC Status Quo
Make use of existing estate and explore more opportunities to share/use other government premises
Minimum 3 24/7 stations, prefer one at Falmouth
More 24 hour centres
More sites required in the south of England
More stations required than mentioned in Consultation Document
Networking and backing up whilst maintaining local touch
No Need for sub-centres
Oil and gas industry submission proposes that all oil and gas incidents handled out of Aberdeen
Plymouth or Cornwall for Southern MOC as seafaring communities. Ideas are sound but locations not justified
Alternative to MOC/Sub Centres. Continue to reduce the number of stations without MOCs however upgrade technology at remaining stations. Cost savings - No MOC South to build, less relocation costs, less redundancy payouts, do away with the need to introduce CSO's to manage CRS.
Proposing sites at Glasgow, Liverpool, Milford Haven, Falmouth, Folkestone, London, Hull, Newcastle, Leith and Shetland plus sub centres
Reduce manning at current centres to two during night hours, supported by your two proposed Maritime Operations Centres
Reduce no of stations from 2 MOCs plus 5 to 5 x 24/7 stations
The Team Leader profile indicates that they would be responsible for a geographic area. Why not forgo the cost of establishing a MOC and leave team leaders with existing stations i.e. within the area for which their geographical expertise exists
Centralisation of HMCG is the wrong way to go and further suggests that the Coastguard should be regionalised
Retain all 18 RCCs but linked together: MOCs no longer required as there will be genuine national cover (resilience) by local knowledge trained staff with suitable backup
Retain one station in Northern Ireland, in Scotland, Two in Wales, five in England (Including Dover and Falmouth) all on 24hr basis
Retain Stornoway, Shetland, Belfast, Liverpool. Locate MOC in Northern Ireland. Aberdeen as a sub-Centre
Scotland coastline needs four coastguard stations
Scrap the MOC concept and replace with many local stations with a hub capability to coordinate on a UK wide basis
Skeleton cover at sub-centres during night periods to provide localised support
Rescue Sub Centres should be 24/7.
Suggestion of at least one daytime centre in each of the government regions so that it could be activated to work autonomously in the case of a national disaster or on a 24hr basis as and when required in the event of a local emergency
The only way to meet increased demand from the maritime sector is to increase our capabilities by increasing manpower to cope with the increased demand utilizing the current system
Upgrade technology to link all establishments and keep more open 24/7 - better for resilience
Vast majority of current stations remain open as day stations 08:00-20:00 with 3 or 4 open as 24hr stations - all stations linked
Co-locate Solent and Portland at Highcliffe
Use of dual kilo streams to link to pair and one other station for resilience
12 MRCCs 24/7 and structure politically acceptable structure
Second communications hub at Belfast i.e. geographically dispersed and not on mainland UK
Locate main IT hub within a military site to minimise security concerns
Retain CNIS/Offshore specialists, put at HQ
Reduce number of MRCCs but link remaining MRCCS better

Other Configuration Ideas
Wind-down of closure stations to be phased down to daylight only hours then closure
That MRCCs consider whether they could become day only stations
Retain at least 9 24/7 MRCC's fully integrated (excluding London)
Retain International SAR at Falmouth
Aberdeen to front interface with oil and gas

Coast Rescue Ideas
Better education of what we do - joint local training arranged via CSO. Enforced and regular safety patrols
Coastguard vehicles need equipping the same as the ambulance service etc. Including sat nav, pda. In order to automate communications between CRS and MOC
Consideration should be given to employing additional Sector Manager assistants in some Sectors at lower cost and avoiding need to re-align sectors
CRS to be equipped with Airwave and operate/adopt local standard operating procedures for interoperability and co-ordinating Agencies on scene
Each CRT to maintain a database recording incidents, trends, agencies involved, contacts etc. Building up to an effective local knowledge source
Improved coastal resilience could be achieved by careful analysis of incident patterns with targeted resources and a reduction of CRS teams mitigated by air mobile response
Technology to be supplied to CRS to facilitate data transfer with MOC/RSC, tasking and on scene coordination, improved communications and access to intranet.
Instead of creating another level of coastal "management" it is suggested that assistant sector managers be created to strengthen the CRS organisation
Introducing new role below CSOs to take on more routine duties
More coordination could be provided by Coastal Officers - Providing technology sufficient
More mobile units to create more mobile structure
More use of IRTs to provide local intelligence
Regular full time staff and Auxiliaries because a more complete service. Current disparity could be a future risk
Introduce 3 tier CRS Management structure. Assistant Sector Manager (ACSO), Sector Manager (SCO) and Senior Sector Manager (SCSO). Responsibilities and roles given in consultation document need more detail
A "bottom up" review of the entire CRS to determine size, shape, roles and organisation.
Devolve more responsibility to the station officer and CRT members. Examples - Training, Admin etc. This would harness the talents and initiatives of the teams and empower the local communities in line with the government concept of the "Big Society"
Use the RNLI as a model to base CRS organisation with regard to equipment, training and numbers of personnel
Retain Status Quo for the Coastguard Rescue Service.
Support for strengthened Coastal Organisation
The Coastguard Rescue Service should be passed to the RNLI and cost savings made invested in the existing MRCC network
The CRS should be charity funded along the lines of the RNLI
To make the proposed concept work, volunteers would require comprehensive training in basic SAR theory and co-ordination.
Transfer/Handover of CRS Volunteers to RNLI.
SAT phones for remote area teams
Centralise management of CRS
CRTs should be paid a retained wage
Retain all 9 CSM Posts to ensure effective management of CRS (3x RD post to fund 9 CSMS managing 2x Team leaders)
Increase CRS training budget

Organisational Amalgamation Ideas
Amalgamate HMCG with RNLI and fund it centrally
Amalgamate HMCG with the US Navy as they are the best
Closer integration at all levels of training, operations and technology with Fire Service
Co-locate MRCC at RAF Valley to incorporate SAR Force HQ and consider creating a JRCC following closure of ARCC in 2013
Cost savings in sharing buildings and technologies
International cooperation, interoperability and load sharing in the future
Joint Channel Agency - Joint control with the French
Link up with National Coastwatch Institution (NCI)
MCA should devolve authority to local organisations like the National Coastwatch Institution (NCI)
Standalone organisation for the Coastguard
Combine or work more integrally with other public bodies such as Borders Agency, HMR&C, Police, Fisheries to form a fully integrated UK maritime organisation.
Consider CG sub offices in the Admiralty/RN bases

Additional Workstreams and Revenue Generation Ideas
HMCG to provide Joint Rescue Co-ordination Centre (JRCC) for UK
Encourage young people to have a career at sea and make more money from exam fees
HMCG to take on role of UKMCC
Greater involvement of CG in dealing inland flood and other natural disasters. Combined with British Waterways and HMRC
Invest Money in MCA estate rather than leasing and extending leases on other property (Cost saving in the long term).
Legislate/Regulate small craft and leisure users
Public to pay for SAR
HMCG to add incident/accident reduction to its core business.
Introduce solar panels and wind turbines on all coastguard buildings as a way of cutting costs or indeed generating income with an objective of becoming self sufficient
Run Shetland Ops centre funded by Shetland Charitable Trust
To search for funding via increasing activities from renewable sea based turbine projects - Funding Streams
MCA to develop our own flood response to capitalise on specialised co-ordination capabilities
With CG Communications we are better placed than other organisations to assist future security requirements
HMCG should take responsibility for Land SAR
Selling property could help fund modernisation, for example Highcliffe
Seek cheaper estates when leases expire
Make use of owned estate for longer term cost savings/business continuity
Introduction of more duties ie VTM etc
MOC to take on Civil SAR (aviation , licensing leisure sector including inland waterways inland mountain SAR and medical transfers
Charge for TEP intakes charge for expertise and training and investigate other avenues of potential revenue
Sell Daedalus
Income and savings made by lease or rent of surplus buildings/vacated office space. Sell Training Centre Site
Economic sense to take a long term lease in Inverclyde area and lease out spare space at Aberdeen
PLA to fund London MRCC
Expand service to cover Inland Rescue
HMCG given more responsibilities in regards to the e-boarders scheme

Partnership Working Ideas
Acceptance of proposal but need to ensure MOU arrangements are reviewed and robust
Better liaison with stakeholders/SAR Partners to build and enhance local knowledge of watchkeepers
Better use of National Coastwatch Institution (NCI) in future proposal
Clear MOUs required with local organisations and responders
Closer links to the Met Office for longer range forecasts
Co-location of Police Marine Unit at Milford Haven
Develop a technical solution to ensure lifeboats are fully monitored from any data centre around the coast
Greater links are required between the Scottish Civil Resilience Manager and Northern Ireland Strategic Planning
Begin dialogue with Irish Coastguard on international synergies and potential joint cost saving initiatives.
Link with Scottish Fishermans federation for training watchkeepers in fishing industry matters
MCA should make more use of other indigenous emergency services for local knowledge purposes
On-scene command function shared with other emergency services
Replace some southern stations with Lifeguards on beaches
Retain the offshore energy liaison team to ensure services to the oil industry are maintained
Single 24 hour Point of Contact (POC) for renewable energies with specific responsibilities and knowledge
There should be more recognition in the proposals for Port Authorities and their responsibilities under Port marine Safety code and improved liaison and an MOU to ensure holes are covered
Use local knowledge of the inshore fishing fleet
Joint working and sharing of facilities with other emergency services, especially Fire and Rescue Service (FRS).
Each MRCC has responsibility for local liaison that was not covered by CRS

Trials and Training Ideas
Alternative watch system involving 5 watches per station and officers attending Southern MOC 1 round a year as part of regular duty and training
Any new technologies need to be fully tested in the future environment before the transformation begins to ensure it provide the solution required and fully supports the new shape of CG
Changes to other sites should only occur once MOC concept is operational
Full networking of the organisation will provide more resilience to cover peak loads and equipment outage. However the local fire services went down this route and the whole project has now been abandoned. So it is essential that the IT infrastructure is in place and validated before any other organisational change.
Get one MOC operational with a number of day stations to prove that this will work
If Belfast were to close or become daytime only mitigation strategy required to include example inter-service familiarisation, testing, harmonised standards
Implement Communications upgrade first. Radio fix must not have Watch Manager position as the control location. Alternative closure phasing plan
Increase training during winter months so trainers can be released to the coast to assess training requirements in summer months
MCA should examine closely the fire control projects to avoid making the same errors
Money could be saved by doing training on station rather than costs of T&E to Training Centre
Future SAR training should include courses for those at the tactical and strategic levels of operational management.
Replicate an incident or simultaneous incidents in real conditions on south coast without cover from RCCs Falmouth, Portland or Brixham to test the MOC/RSC concept.
Adequately train on-scene commanders and ensure they were competent in handling emergency situations

Trials and Training Ideas
Coastguard officers undergo blue light driver training to obtain RTA exemptions to mitigate
Sound idea - but cautious approach to technology to allow to bed in
Support for proposal but a full feasibility pilot is required
System to be run as a pilot scheme and run in parallel with the existing structure
The change must be managed over a longer period to reduce risk, given the experiences of South East Coast Ambulance Service mergers.
Use existing stations to train CRTs and RNLI
Train ops room staff to the grade above providing a bank of officers able to step in when the need arises
Training staff (from MCA TC) to visit stations to monitor and assess skills and standards. Develop e-learning training packages for the coast
MRCC to be established as a centre of excellence for TSS and V103 Qualifications. Incentivise CG for amount of qualifications held
Training courses restricted to autumn and winter months
Maintain a pool of Trainers (staff) to fill vacancies at each station
Staff joining CG would start training at MOC before being assigned to home MRCC to complete training
Training: regional training capability, SMC "Command Team" Training
Embrace and involve operations room staff to design and help implementation of future Coastguard
Establish 8 centres of excellence for each CG Technical Competency
Staff should be trained for a position before they can apply for a position
No officer to be allowed to apply for a Training Officer vacancy without being a substantive WM or having at least 6 years operational service
CG to be training as VTS operators
Training facilities at North and South MOCs
MOC should have prime training role. This is where trainers would start

Staff/Staffing Ideas
Decrease CEO pay to enhance staffing and increase basic pay
Manage staff hours differently to allow all stations to remain open with 24hr coverage
New posts must be graded against other emergency services and not against civil service administrators.
A move from MRCCs manned continuously by shift workers. Introduce more day workers and less shift workers. This would increase resilience, balance numbers on watch in line with incident statistics (days busier) and incur a cost saving due to less staff claiming shift allowance
Reduce Falmouth shift pattern to 4 watches of 5 (saves 7 staff) but maintain 24/7)
No need for an additional layer of Coastal Management and clearly indicates the opinion that the MCA should pay its existing staff a professional wage
Retain current shift pattern. It allows good recovery period. Annualised Hours
Retain Status Quo but Use Volunteers to man stations
Retain watch shift system
Review workload on a site by site basis and adjust staff levels accordingly
SM, do not require more managers. They need a reduction in teams. This could be achieved by introducing SM assistants at less cost than proposed
SMC experience should be part of shift heads roles and responsibilities
Strategic personnel should not be watch keepers
To review existing watch patterns and resourcing
Flexible staff working levels, consider adjustment to forecast poor weather or increased traffic situations
Within each team in MOC there should be a member to provide extensive knowledge of local place names

Staff/Staffing Ideas
Must have flexibility during changeover
Reduce manning at night with "on call" officers in event of major incident
Introduce new posts - 1 per area, coastal support officers - to support SMs, senior watch manager to support RCCMs and WMs and provide resilient support for operational front line officers
Review the MCA Management structure particularly in relation to HMCG to achieve a flattened out management structure
Remove the CWA grade from MRCCs and associated personnel numbers
Remove the SM role to be replaced with increased liaison and management of the CRS by MRCCS. Replace with a dedicated trainer at each MRCC
Formation of an elite team of SMC qualified officers to lead a regional centralised resilience team for major incident working, covering staff shortages during periods of technical failure located in a hub in each region
Annualised Hours
50% increase in base salaries
A change of role title could lead to greater pay
Senior Watch Manager at each MRCC
Spread workload more and increase functionality to meet the Vessel Traffic Monitoring Directive
More qualifications = more pay
All grades raised 1 pay band (RCCM to CWA)
Additional staff available on call
Keep current shift system. Would allow people to stay away when on shift and travel home after their 4 watches for 4 days
6 shift team system - six teams, 12 hour watches, for MOC, Shift Leader and 8 Staff in each team two teams to provide sick leave/cover, on call can be deployed flexibly
Staffing level for RSC = 4 per watch staffing level for MOC = 9 per watch
Abolish CSMs - SMs report to RCCMs
Abolish CWA, WO and WM Grades. Have CG1 and CG2 with pay indicators given
Progression up pay scale is dependant on qualification
"When staffing levels are unsustainable... realistic retirement redundancy offers or relocation for staff to other stations or priority given for them to take on coastal safety officer roles in their chosen location "
Allow surplus staff at remaining stations until natural wastage occurs
Reduce Operational post from 596 to 489
Consider the introduction of additional qualifications to ensure staff retain qualifications and skills and remunerate accordingly eg in date SMC ticket etc
Current RCCM to be operations managers, their counterpart will be coastal rescue service manager (in charge of CRS but same grade as Operations Manager)
SMs assisted by coastal support staff to provide career progression
CSAR O - CRS (current CSM role) MSAR O - Ops Manager (current RCCM) MSAR S - Strategic Manager (Chief CG on equivalent)

Selection Criteria Ideas
Conduct an "Insurance Style" risk /cost analysis which stations to close and which to retain.
Decision on sub-centre locations should not be political but taken in consultation with Shipping Agencies and waterway users
Locate additional stations to proposed lay down based on strategic location and particular area they guard

Selection Criteria Ideas
Locate centres in four corners of the UK Stornoway, Aberdeen, Dover and Falmouth, reason: concentration of shipping and marine industry as it passes close to the UK
Locate stations in areas where there are significant marine developments
Locate stations next to high level density commercial/leisure traffic
Proposal a good idea -but the role of London CG could be undertaken by the Police as this work is replicated by the Police for majority of incidents. London being kept open is a political decision? .
Reconsider location of Northern MOC. Better placed in Scotland's Central belt. Reasons: Transport Infrastructure, co-location with other emergency authorities and more convenient access to other government departments
Retain Centres based on incident numbers e.g. retain busy stations
Retain stations with co-located facilities
Select MOC/RSC sites based on co-location with other MCA resources.
Select sites on correct size and least staff changes
Selection should be based on sites with highest incident numbers
Sub-Centres should be based on minimizing relocation costs so placed in areas with stable staffing
Too many MRCCs - Thought should be given to location/risk and to flexible manning (including on call staff) for 24/7 cover
Use existing estate in England and Wales rather than expensive new build
Stations should reflect tonnage of ports, types of cargoes, locations: Aberdeen - oil industry/North Sea traffic; Southampton - English Channel traffic; Milford Haven - oil, LNG industry & Irish sea traffic
An accurate and detailed assessment of the level of activity at each MRCC is made - not just incidents
Conduct a properly structured and managed review panel but with substantial staff input to identify change management issues and likely turnover rates

Other Ideas
A different way to tackle the cost saving issue is to start by asking the people on the front line how they would make improvements and cost savings
Appoint a single point of contact for independent lifeboat operators and other declared facilities
As the UK is part of Europe and an island surrounded by international shipping, (which benefits Europe as a whole) European Community should be making a substantial contribution to the upkeep of this essential service.
Automated weather service available on line or on a VHF Channel
Communications could be piggy backed onto Firelink airways scheme
Concern that the proposal does not consider devolved government requirements - in addition the model of devolved Scottish Coastguard should be trialled before proposal complete
Consider lessons learned following closure of Kirkwall centre in 2000
Consult with devolved administrations before making final decision
Create a well publicised national phone number for the Coastguard as in France (which is 1616).
DF Needs to be reinstated
Each area should have own VHF channel (like Eire)
Each remote radio site should have a standalone VHF DSC with an aerial on the mast
Efforts to improve search and rescue should be executed in parallel with an external review of the effectiveness and application of regulatory standards. 'Prevention better than cure'. If we don't do what we say we do then should we exist in our current form at all
ETVs need to be retained
Every effort should be made to renegotiate the lease at Milford
Mandatory basic maritime and boat training for leisure craft users.
Have local press arrangements as opposed to having to go through Southampton
Local Coastguard can police the local area. Coastguards need to be out on boats looking after the area
Long term cost savings would be greater by using existing MCA owned buildings rather than leased properties

Other Ideas
Modernise technology and value the opinions of front line co-ordination staff and customers when seeking to improve the service
More key elements of local knowledge should be built into the system
Use the simplicity of the ambulance E.R.C channel as a model for our radio network (relay stations - Simple but effective)
Regions scrapped - Management re-structured
Rescue Sub Centres should have direct communications with each other.
The nomenclature of posts within the consultation document is confusing and should be reviewed viz a viz "Coastal Safety" "Prevention Work"
Maintain established relationships between partner agency commanders during incident response operations
Transfer of SAR co-ordination from Liverpool to the IOM for incidents within 3 miles of the coast should be progressed and reviewed
Turnover redundant stations to RNLI and NCI, Retain DF
Webcams to assist coverage of coast. Respondent did not feel that remote on call safety officer would strengthen on land command and control and suggests that web cam technology may develop the concept of operations to an accountable level
IT Support on each MRCC
Locate servers at Data Centres or MRCCs
VTS Radar should be installed at MRCC Liverpool
Maintenance (property) budgets should be delegated to the relevant RCCM for the MRCC and SM for the Sector base
RCCMs to become district commanders with responsibility for MRCCS and fields
Name MRCCS after geographical areas not its location would lead to a more nationalised service eg MRCC Scotland
Modernise current legislation so that it is current and fit for purpose look at current pyrotechnic legislation and update in the light of current technology reactivate day station in light of major incident
Improve interface between waterborne/coast using public and the Coastguard
Change the nomenclature of MRCC's to RCC's to reflect the widening inland remit
Change title of HMCG to UKCG to better reflect its increasing role in the UK
Streamline non operational management structure eg Chief Coastguard Reports direct to CEO
Use Daedalus for Training Centre. Increase income

Glossary of Terms

CG&R	Corporate Governance & Risk
CRO	Coastguard Rescue Officer
CRS	Coastguard Rescue Service
CRT	Coastguard Rescue Team
CSM	Coastal Safety Manager
CWA	Coastguard Watch Assistant
DfT	Department for Transport
ETV	Emergency Towing Vessel
FOIA	Freedom of Information Act
HMCG	Her Majesty's Coastguard
MCA	Maritime & Coastguard Agency
MIRG	Maritime Incident Response Group
MOC	Maritime Operations Centre
PCS	Public and Commercial Services Union
RCC	Rescue Co-ordination Centre
RCCM	Rescue Co-ordination Centre Manager
RNLI	Royal National Lifeboat Institution
RSC	Rescue Sub Centre
SAR	Search and Rescue
SAR-H	Harmonised SAR Helicopter Force
SM	Sector Manager
SOLAS	Safety of Life at Sea Convention
SRO	Senior Responsible Officer
TEP	Time Expired Pyrotechnics
VHF/DF	Very High Frequency (Radio) Direction Finding
VTM	Vessel Traffic Monitoring
WM	Watch Manager
WO	Watch Officer