



**Coastguard
Modernisation
Consultation 2011**

“Protecting Our Seas and
Shores in the 21st Century”

**Scottish Accident
Prevention
Council**

Comhairle Sgiorradh
Bacadh h-Alba

Formed in 1930 the Scottish Accident Prevention Council, is the only body in Scotland where practitioners, politicians, frontline staff, academics, government, local authorities, health professionals and interested partners come together to formulate and enhance the worth of accident prevention.

Our objectives are

- to bring together Scotland's accident prevention community
- co-ordinate approaches to accident prevention
- to stimulate debate in the accident prevention arena
- to promote best practice in accident prevention design
- to promote implementation of common sense strategies
- to support enhancements in accident prevention policy

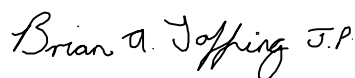
Our membership and partners are drawn from a wide range of organisations and bodies throughout Scotland who have an involvement in matters affecting accident prevention, and safety, in the public, private and voluntary sector as well as working in partnership with the Scottish Government and the Convention of Scottish Local Authorities (CoSLA).

The Council consists of representatives from the majority of Scotland's Local Authorities, including Police, Fire Services, Education, Social Work and Roads Departments; Health Boards, Housing Associations, Motoring Organisations, and voluntary and professional bodies are also included in our membership, as well as harbour masters.

Each of the organisations represented on the Council has an involvement in safety to varying degrees. Collectively, the combination of local authority elected members and officials, professional bodies and dedicated voluntary groups has an outstanding range of administrative and technical experience.

The principal role of the Council is to bring together all of these interests in a way that is not possible in any other forum. By sharing experiences and learning from the contributions of its members, the Council is in a special position to identify trends in accidents in Scotland and, more importantly, to concentrate the combined weight of its membership towards achieving practical solutions.

We welcome the opportunity to respond to the Maritime and Coastguard Re-Organisation Consultation and look forward to working in partnership with the United Kingdom Government in promoting safer maritime communities around these islands



Brian A. Topping
President

The United Kingdom Government believes strongly in the ethos, value and importance of our maritime and coastguard services and seeks to have continuous improvement in the service for the peoples of these islands. As a part of the United Kingdom with 60% of the U.K.'s coastline major linkages to island communities and inland water ways, the future direction and development of the Maritime and Coastguard Agency is of critical importance to the safety of those living and working in Scotland's maritime community.

Whilst welcoming the opportunity to streamline various aspects of government through the reform of the agency, we draw to the Ministers attention various issues that will impact on those communities and organisations especially relating to the following three;

- *Local knowledge: An understanding of language, translation, topography and geography ensuring a consistent level of provision*
- *Efficient Government: Level playing fields and equal treatment with improved deliver and enhanced reputation of services across the service*
- *Accident Prevention: Reducing duplication and effective monitoring of safety controls*
- *People – Supporting volunteers and ensuring public service*

Overall Vision

In general the Scottish Accident Prevention Council agrees with a vision of a maritime and coastguard service that seeks to improve and enhance the role of Maritime and Coast Guard Agency (MCA) in creating safer water usage as well as that the consultation has merit in that it seeks to reduce duplication of services and enhance delivery to the citizen, with the outcome of a safer maritime community

Improvements to service delivery of the MCA are not only commensurate with economic and managerial change but in addition and critically cultural change. Legislators must recognise that changing managerial roles, regarding staff and rearranging the deckchairs is counterproductive to real and pragmatic change that can be measured and evaluated.

Improving the Landscape

Since the 1970's the present structure of the MCA has sought to serve a diverging maritime market place, increases in water based leisure pursuits, major design changes in shipping, and other government reforms such as the Independent Review of Open Water and Flood rescue in Scotland. Whilst these changes have placed additional burden upon emergency service staff, little has been done to recognise the divergent needs of search and rescue regions across the British Isles in which west of Scotland & Northern Ireland alone has some 360,000 square miles of coastline.

Nevertheless, it is critical that any re-organisation of the MCA must reflect the divergent needs of the maritime community; whereas the southern English coastline will have a large peak period for leisure activity in the summer, the majority of the entirety of the Scottish coastline remains constant in terms of multiple activities.

Furthermore, the Coastguard has been through a number of reviews since the 1970's. The current proposals appear to be based on a seasonal / diurnal (day to night range) basis which, while

perhaps appropriate for Southern UK where there is a larger leisure market and beach culture, this is not applicable to Northern Scotland. The incidents in Northern Scotland appear to occur at any time of the year or day with no discernable peaks.

There also appears to be no weighting given to the severity and duration of an incident. For example a individual blown off the beach on an inflatable may only require a 10-minute response, whilst an event such as the Piper Alpha takes many days of 24-hour co-ordination.

In addition, the consultation focuses on search and rescue co-ordination provided by the Coastguard and not on the many other services that the station provides to the local area.

For example;

- Co-ordination of local resources in the event of extreme weather / landslides.
- Co-ordination and local tasking of local emergency helicopter and alternative landing / pick up sites.
- Co-ordination of out of hour's local inter-island ferries with other emergency services.
- Local and inshore leisure and small boat users – voyage plans, Local forecasts and information and reporting.
- Importance of accident prevention work
- Contact between full time professional staff and the numerous volunteer Coastguard Rescue Service members.

In considering these proposals the Council would advise the United Kingdom Government to consider the following issues:

- Advises the UK Government to seek a fresh and pragmatic approach to coastguard modernisation giving value to the 12 MRCC model operating 24 hours; enabling the delivery of savings, while providing wide geographic coverage and ensuring the retention of a robust, technologically sound service which maintains critical local knowledge and experience
- Advises the UK Government to seek a fresh approach to the withdrawal of ETV services, with particular regard to the north-west of Scotland, where it is clear that there is market failure and no realistic prospect for a commercial solution for a critical service.
- Suspend the consultation until the formation of new devolved administrations in Northern Ireland, Scotland and Wales to allow for a broader debate on the joint working approach of all UK administrations to further enhance an outcome lead Maritime Service fit for purpose and relevant to the maritime community of the British Isles.



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