# OPUS<sub>2</sub>

The Cranston Inquiry

Day 8

March 13, 2025

Opus 2 - Official Court Reporters

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11 Α.

12 Q.

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17 Α.

18 Q.

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23 Α.

24 25 Q.

6 Q.

10 Q.

Thursday, 13	March 2025 1 working in relation to rescue
(10.00 am)	2 Channel?
SIR ROSS CRANSTON: Yes. Well, good mornin	g, everyone, and 3 A. That's correct.
good morning, Mr Willows. Could you just rea	ad the 4 Q. Thank you very much.
affirmation, please.	5 And it's fair to say if th
MR THOMAS GREGORY WILLOWS	(affirmed) 6 Command was created in Dec
SIR ROSS CRANSTON: Yes. Well, thanks very i	much. So 7 somewhere in the order of two
Ms Woods has some questions for you.	8 were working in that role; is
Questions by MS WOODS	9 A. That's correct.
MS WOODS: Good morning, Mr Willows.	10 Q. Thank you very much.
A. Morning.	11 Prior to your work for Bo
Q. Is it right you have provided a witness stater	nent for 12 or for BFMCC, is it right that
this Inquiry dated 3 December 2024?	13 enforcement officer?
A. That's correct.	14 A. That's right, yes.
Q. And I think that statement consists of about s	six pages; 15 Q. I want to ask you a little bit
is that right?	16 it right that that involves w
A. That's correct, yes.	17 Border Force?
Q. Thank you very much. I want to start, if I ca	an, by 18 A. That's correct. I spent about
asking you about your role and in particular a	about your 19 cutters.
role in November 2021. Is it right, based on	your 20 Q. And we heard a little bit from
statement, that you were working as an immig	ration 21 about the kinds of work that a
officer ?	22 combating smuggling of good
A. That's correct. I was based in the Maritime	Command 23 immigration. Was that the ki
Centre, yes.	24 part in in that role?
Q. On Tuesday, we heard your colleague Karen W	/hitehouse 25 A. Primarily smuggling operation
1	3
refer to you as something called an EQ. I this	ak 1 Q Smuggling operations
refer to you as something called an EO, I thir an executive officer. Can you tell us what t	
an executive officer . Can you tell us what the	hat is? 2 A. The migrant activity hadn't co
an executive officer . Can you tell us what the A. Yes. Well, within the Civil Service grading,	hat is?2A. The migrant activity hadn't coit 's3the boats. I came off the board
an executive officer . Can you tell us what the A. Yes. Well, within the Civil Service grading, officer grade. Karen is my line manager, HC	hat is?       2       A. The migrant activity hadn't constraints         it's       3       the boats. I came off the boats         0, higher       4       activity started in about 201
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- Α. 24 yes.
- 25 Q. But is it right, based on this, that you are no longer

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he Small Boats Operation cember 2022, it's been o to three years since you that right? order Force, is it right -at you worked as a maritime it about that, if I can. Is vorking on a cutter for ut 15 years working on the m Commander Toy on Monday a cutter might undertake;

of small boats in the

- ds, combating illegal
- ind of work which you took
- ns.

		3
1	Q.	Smuggling operations.
2	Α.	The migrant activity hadn't commenced whilst I was on
3		the boats. I came off the boats in 2014 and migrant
4		activity started in about 2018.
5	Q.	So if we go to paragraph 2, page 1 of your statement $$
6		it is the same document {INQ010214/1} $$ we can see,
7		paragraph 2:
8		"During my time working on the cutters, I was never
9		directly involved in migrant rescues operations "
0		And as you have just told us, that's because that
1		didn't really start to become a part of your work until
2		2018; is that right?
3	Α.	It's correct.
4	Q.	We can take that down. Thank you.
5		When you were working on cutters as a maritime
6		enforcement officer, were you a member of the crew or
7		were you undertaking sort of separate law enforcement
8		role? You weren't a CFI or anything like that, were
9		you?
0	Α.	${\sf I}$ was a member of the crew, so ${\sf I}$ was a member of the
1		cutter crew and the boarding crew, so
2	Q.	And were you a qualified mariner?
2	•	E 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1 1

- takes marine qualifications,
- 24 depending what level they are, so I had certifications
- 25 appropriate to my level on board the boat.

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- 1 Q. Thank you very much.
  - Turning back then to the role of immigration
- 2 3 officer , can you tell us a little bit about the function
- of an immigration officer, please? What were your 4
- 5 responsibilities ?
- 6 A. Within the Maritime Command Centre?
- 7 Q. Yes
- A. Specifically to Operation Deveran or ... 8
- 9  $\mathsf{Q}.\;\;\mathsf{I}$  want to understand the role in general first , if
- 10 l can
- 11 A. Okav.
- 12 Q. Is it right that an immigration officer might have
- 13 a range of different roles?
- A. Our primary role in the Maritime Command Centre was 14
- 15 looking after the fleet of Border Force assets, tasking
- 16 and deploying them on a day-to-day basis, having to look
- 17 after the welfare of the crew, and we're the single
- 18 point of contact for other Government agencies who might 19 need assistance from -- from Border Force.
- 20 Q. We heard from Karen Whitehouse on Tuesday that her role 21 was national, not just focused on the Channel, but
- 2.2 dealing with the Border Force fleet as a whole. Is that 23 also true of your role?
- 24 A. Yes, that's correct. The fleet work round the whole of
- 25 the UK, so yes, it was a national role.

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- 1 Q. And how much of your time was focused on the Channel as 2 opposed to that national picture?
- 3 A. The proportion of the time increased over the years from 4 when it first started. Events were few and far between
- 5 and then, yes, it got to the stage where the majority of our time would have been taken up by Operation Deveran 6 7 work
- 8 Q. Was that true in November 2021?
- 9 A. Yes, certainly the majority of our work would have been 10 on Op Deveran.
- 11 Q. You talk about "our work". Are you talking about 12 immigration officers or are you talking about yourself 13 and the higher officer you worked with on that tasking?
- 14 A. My role specifically in the MCC.
- 15 Q. Thank you.
- 16 In terms of the structure of your role, who did you answer to? Who was your line manager? 17
- 18 A. Karen Whitehouse is my HO at the time.
- 19 Q. Was it always Karen who was your line manager working on 20 a shift or did you work with different higher officers?
- 21 A. I would have worked with different HOs at different
- 2.2 times if Karen was on leave. Someone might have swapped 23 shifts . So yes, but ...
- 24 Q. Did you also have a more senior officer available to you 25 during your shifts?

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- 1 A. Yes, there was always an on-call SO who was available if 2 things needed escalating
- 3  $\mathsf{Q}.\;$  And if you needed to speak to them or contact them, was it Karen Whitehouse who would do that or were you able 4
- to contact them yourself?
- A. Either one of us, as -- as appropriate at the time. 6
- 7 Q. And how would you contact them, if you needed to?
- 8 A. By telephone. They weren't on duty in the office, so we 9 would phone them.
- 10 Q. What sort of circumstances might lead you to contact
- a more senior officer for assistance or support? 11
- 12 Α Specifically to Op Deveran?
- 13 Q. Yes. So November 2021, in the role you are undertaking
- 14 ordinarily with Karen Whitehouse, in what circumstances
- 15 might you call the senior officer who was potentially
- 16 on-call for assistance or support?
- 17 A. If an incident needed escalating, if there was -- either
- 18 if one -- if there had been a request for a Border Force
- asset to go into French territorial waters for any 19
- 2.0 reason to assist in a rescue, then that would have to be
- 21 certainly flagged to the SO, or if there had been
- 22 a serious incident resulting in injuries or fatalities ,
- then that would need to be escalated to the SO. 23
- 24 Q If you needed advice or support on a decision whether to 25 task an asset, for example, is that something that would

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- 1 go to the higher officer or would you contact the senior 2 officer? 3
- A. We would take that decision in the office between us.
- 4 Q. Yes. I want to understand how your role interacted with
- that of a higher officer . So you have told us, I think, 5
- 6 that the higher officer was essentially your line
- 7 manager, your direct report; is that right?
- 8 A. That's right.
- 9 In evidence on Tuesday, Karen Whitehouse told us that Q.
- 10 there was very little difference between your role and
- 11 that of the higher officer . Is that something you would agree with? 12
- 13 A. Primarily, yes. We both carried out the same functions.
- Karen or whoever the HO would be would ultimately have 14
- 15 the line management responsibility, but essentially.
- 16 day-to-day roles for the work that we were doing,
- 17 especially for Op Deveran, our roles were pretty --
- 18 pretty much the same.
- 19 Q. Understood. 2.0 Can we go to your statement at paragraph 11, please,
- 21 page 4 {INQ010214/4}. So halfway through that
- 2.2 paragraph, you are talking about decisions to task
- 23 an asset and right in the middle, it starts :
- 2.4 "As it was, Karen was leading on managing the
- 25 surface assets during that shift, I simply rang

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	[Her Majesty's Coastguard] to query the latest updates
	on the tracker."
	Is that a fair description or were you working
	collaboratively, making decisions together in concert?
Α.	Yes, so generally, the way we worked as a pair, we would
	discuss and decide at the start of each shift how we
	were going to run the shift . One of us $$ on this
	particular shift , Karen would look after the case filing
	and electronic recording side of things, doing the live
	updates, and I was looking after the telephones and the
	radios .
	So we would decide that at the start of the shift ,
	who was $$ who was going to do what for the duration of
	the shift , but we would $$ it was a small office. There
	is only two of us in there. Three desks, but there was
	only two ever $$ generally, there is only ever
	two people on duty. We are a small team. So we knew
	exactly what was going on between us the whole time.
	Any telephone call or radio transmission would be heard
	has been been to also affine the sheet to also seen

- $2\,0\,$   $\qquad$  by both of us in the office . So yes, that is the way
- 21 we -- we ran it.
- Q. Can you help me to understand those logistics? You arein a small room just yourself and Karen Whitehouse, is
- 24 that right, or usually Karen Whitehouse, on a shift?
- 25 A. That's right.

9

- 1 Q. Are you sharing a desk? Are you sitting close to each 2 other? What is the arrangement?
- 3 A. Our desks are next to each other.
- 4 Q. Okay. And if there was a call or contact via the radio,
- 5 could you hear the other person on a call? Could you6 hear the radio?
- A. Certainly the radio. Of course, it is a -- yes, it's
   a handset, so the radio would be heard by both parties,
- and telephone call, yes, generally you could either hear
- it or the other person would just say what had been saidwhen you came off the phone.
- 12
   Q. Okay. Between yourself and the higher officer, who had

   13
   final decision-making authority? Who was the one who
- 14 actually made a decision about tasking an asset?
- 15 A. The HO.
- 16 Q. If you were taking a call as you have described and
- there was a request to task an asset, could you take
  that decision yourself without consulting the higher
  officer ?
- A. I would always consult the HO to make that. If the HO
   was there on duty, we would discuss it together and,
- yes, ultimately the HO would make the decision.Q. Okay. You have talked a little bit about speaking
- Q. Okay. You have talked a little bit about speaking onthe phone, speaking on the radio. I want to understand
- 25 how the different communications were happening in the

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- office . So you have said you were talking to the higher
- $2 \qquad \qquad$  officer physically in person when you were both in the
- 3 office ; is that right?
- 4 A. Yes.

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- Q. When you were speaking to HM Coastguard, was that doneby phone, by radio? How were you communicating with
  - them?
- 8 A. Generally via telephone.
- 9 Q. Generally by telephone?
- 10 A. (Nods).
- 11 Q. And what about an asset? So before it was deployed, if 12 you needed to call a cutter commander, for example, how
- 13 was that done?
- 14 A. That was done by telephone to tell them that they were15 being tasked. That would be a telephone call.
- 16 Q. Once an asset had been deployed, so the cutter is out in
- 17 the Channel, it's left the port of Dover, was that the
- 18 same? Were you still talking to them by phone or how
- 19 did you communicate with an asset?
- 20 A. Both means -- both means available, either telephone or
- 21 airwaves radio. Obviously they had VHF on board, but we
- 22 don't have that in the office because you haven't got
- 23 the range. So the coastguard could talk to them on VHF
- 24 radio, but we could talk to the vessels either by
- 25 telephone or by airwaves radio.

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1  $\mathsf{Q}.\;$  You have mentioned VHF radio. Did you say you haven't 2 got sufficient range to listen to VHF radio in the 3 office ; is that right? 4 A. That's correct. VHF has a range of approximately 5 30/40 miles line of sight, so yes, we wouldn't be able 6 to speak to vessels that far away, no. 7 Q. It's right you were based at Portsmouth, weren't you? 8 A. That's correct. 9 Okay. In what sort of circumstances might you speak to Q. 10 an asset once it had been deployed? So after the 11 initial tasking, as I say, en route in the Channel, in 12 what circumstances might you be contacting, say, the 13 Valiant? 14 A. Sometimes it would be a welfare check, depending how 15 long they had been at sea; if we needed to -- if we 16 needed an update from them for any reason. But most of 17 the communication, once the asset was at sea, would be 18 through the coastguard, the coastguard talking to the 19 cutter. 20 We would speak to them -- once they had intercepted 21 a migrant event, we would pass the -- our reference 2.2 number, the M number, Mike number. We would pass that 23 to the cutter, so we would contact them to pass that 2.4 number. But most communication with the asset, once it 25 was tasked, was by the coastguard.

1 Q. What about the number of people embarked on the cutter? 2 Was that something you would communicate directly with 3 the cutter about? A. Yes, the cutter would -- ultimately, they would notify 4 5 both us and the coastguard of the numbers that they had picked up, but yes, we would speak to them once the --6 7 once the event was concluded. Obviously it was a very 8 busy time on board the vessels when they were involved 9 in embarking the migrants, but yes, once they had 10 concluded the events, we would speak to them and obtain 11 the numbers from them. 12 Q. You have told us a little bit about the different 13 communications you would be having in the course of your shift . How were you recording or writing down or using 14 15 the information you were obtaining on those calls? A. As I said earlier , the way Karen and I worked was we 16 17 would decide at the start of each shift who was -- well. 18 we would have one person looking after the recording on 19 the case register and the live event updates. One of us 2.0 would be doing that for the shift and the other person 21 would be looking after the radio and the telephone 22 calls . 23 A lot of the details which we were recording on our 24 live events updates, our hourly reports, a lot of the 25 details on that were taken direct from the coastguard

13

1 tracker. So it was a case of trying to confirm details

2 from -- from the coastguard tracker to our hourly

3 report. Any additional details which might be obtained 4

- on a telephone call or radio transmission would have 5 been recorded directly into the electronic reports.
- 6 Q. Understood.
- 7 So an important part of your role, depending on the 8 division of work between the two of you, was inputting 9
- that information into logs and trackers and making records of what you had been told on calls; is that
- 10
- 11 right?
- 12 A. That's correct.
- $\mathsf{Q}.\;$  Can I ask you a little bit about your training for this 13 14 role? I'm afraid there is not much in your statement 15 about that, so I want to ask you first quite a general 16 question. What are the qualifications that are required 17 to work as an immigration officer?
- 18 A. Specifically within the MCC?
- 19 Q. In general, to start with. We will get more specific in 2.0 a minute, but if you can just tell me, to become
- 21 an immigration officer, to take on the role that you had
- 2.2 at that time, what qualifications do you need? What
- 23 training?
- 24 A. Well, I mean, immigration officers -- you know, you have 25 got frontline immigration officers who are dealing --

14

- 1 who are working at ports and airports, or you have got 2 ourselves who are -- who are not frontline-based. We 3 are in the Maritime Command Centre, which is 4 a support -- support role. So it's a -- so it's in the 5 roles and different training ultimately. My -- personally, my background was I was a trained 6 7 Customs Officer who had worked on the fleet and then 8 came off and worked within the Maritime Command Centre 9 subsequently. 10  $\mathsf{Q}.\$  Is there any basic training which all immigration 11 officers receive or is it all specialised to the 12 particular tasking you have within that role? 13 Yes, it's specialised to the role you are doing. 14 Frontline officers would be trained to a different 15 capacity to support officers. 16 Q Understood 17 Moving then to your specific role working on 18 Operation Deveran and responding to boats within the 19 Channel, what training were you given to undertake that 20 role? 21 A. It was -- it was a work area that developed, you know, 22 from when migrant events started. So I wouldn't say 23 there was any specific training for Op Deveran itself. 24 We all had general maritime background experience, but
- 25 the running of events, the recording of information was

15

1		something which was just on the job training, I guess.
2		Once —— once the events started, yes, we just —— we
3		learnt as we went along.
4	Q.	And in relation to small boats in the Channel, were you
5		given any training about particular facets or challenges
6		or aspects of that response work which were different to
7		other general maritime work? So, for example, we know
8		there are particular challenges associated with small
9		boats to do with the nature of the boat, the difficulty
10		locating or identifying the boats, the ways in which
11		they move or travel. Had you had any training on that
12		sort of content for this role?
13	Α.	We all received briefings . There was weekly briefing
14		reports from $$ from CTC and whoever were running
15		Op Deveran from Dover. So there were weekly briefing
16		reports which highlighted the current trends and
17		associated risks with ongoing events, so we updated
18		ourselves through those briefings from our own managers.
19		So yes, that's how we basically kept up to date with
20		regards ongoing threats.
21	Q.	Did you have any specific training in incident response
22		or risk assessment to help respond to small boats in
23		distress ?

- 24 A. If there was -- if small boats were in distress, that
- 25 was something which would be -- well, it would be down

- $1 \hspace{0.5cm}$  to the coastguard who would be dealing with the incident
- 2 at the time, you know, realtime. That would be a -- be
- 3 within the coastguard remit to deal with any ongoing
- 4 distress scenarios.
- 5 Q. You were being asked to make decisions about the tasking
- 6 of assets in response to small boats which were quite
- 7 often in distress . I think we have heard evidence that
- $8 \qquad \ \ \, \text{all small boats were treated as being in distress}$  . Is
- 9 that something you agree with?
- 10 A. Yes, the grading of each -- every small boat event as it 11 was reported and, you know, when it was entered into the
- 12 coastguard tracker, the status would change when it was
- 13 % 13 in French waters. As soon as they all entered
- $14 \qquad {\sf UK}$  waters, they were then classified as distressed
- 15 because of the nature of the boats and the situation.
- 18 Q. Can you help me to understand that distinction? They19 were classified as distress, but not necessarily in
- 20 distress . What do you mean by that?
- 21  $\,$  A. Well, it was the view that was taken that because of the
- $22 \,$  type of boats, the quality of the boats, they weren't
- 23 obviously trained mariners on board, they were poorly
- 24 equipped boats. Obviously, Operation Deveran as
- 25  $\,$  a whole, the primary role was SOLAS. It was all about

- 1 safety of life . So hence, yes, all the vessels were 2 classified from the UK side as distress once they 3 entered UK waters. 4 Q. You have told us they often weren't genuinely in 5 distress. Does that mean even where they were 6 classified formally as being in distress , you weren't 7 always treating them as though they were in a state of 8 distress or emergency? 9 A. Yes -- yes, it's difficult to answer that. Obviously 10 some of them would -- yes, there was -- generally they 11 would still be underway. They would still be making way 12 through the water, but the reason they were classified 13 as distress on the coastguard tracker and on ours was because of the nature of the boats and that they were 14 15 totally unsuitable boats and the, yes, primary 16 requirement was to locate and pick up the boats. 17 Q. So coming back to my original question then, did you 18 have training for risk assessment or incident response 19 for boats are that were categorised as being in 2.0 distress, as you put it?
- 21 A. Not specifically , not to my knowledge.
- 22 Q. Did you take part in any drills or practical exercises
- 23 with the cutters or with other assets?
- 24 A. Table top-type exercises, you mean?
- 25 Q. For example, yes.

18

- 1 A. Not personally, no.
- 2~ Q. Did you ever do training with other stakeholders or
- 3 agencies who had involvement in Op Deveran? So, for
- 4  $\qquad$  example, HM Coastguard, perhaps the RNLI as a voluntary
- 5 organisation assisting .
- 6 A. Not personally, no.
- 7 Q. No, okay.
  - I want to ask you now a little bit about the working
- 9 arrangements for the night of the 23rd into the
- 10 24 November 2021, if I can.

11 A. Yes

8

2.4

- 12  $\,$  Q. Before I do that, I just want to clarify what it is that
- 13 you remember about that night. So can we turn to your
- $14 \qquad \qquad {\tt statement, paragraph 5, page 2, please \{INQ010214/2\}}.$
- 15 So you say in your statement:
- 16 "I cannot recall the night of 23 November into
- 17 24 November 2021 because it was a 'business as usual'
- 18 night. Whilst I now know of the tragic events which
- 19 unfolded whilst I was on shift, I did not know at the
- 20 time. I cannot recall exactly what work I did that
- 21 evening and I have not located any notes or emails from 22 that shift."
- 23 Can I ask you now, Mr Willows: do you have
- an independent recollection now of that night?
- 25 A. Having heard and seen the various transcripts of

19

- 1 telephone calls and radio transmissions that were made 2 that evening, I obviously know that I was on duty and 3 I was in the -- in the MCC that night, but it's three 4 and a half years ago, so I don't have any specific 5 recollection of the specific shift itself . 6 Q. Is it fair to say then that you are reliant on the 7 documentary material to tell us about what happened on 8 that night? 9 A. That's correct. 10 You don't have any sort of independent memory of that 11 specific night beyond what the documents and the 12 transcripts tell you? 13 A. That's correct. 14 Q. Thank you. 15 Is it right that you were never interviewed by the 16 MAIB as part of their investigation in this incident? 17 A. That's correct. 18 Q. So is it right that the first time essentially you have 19 been asked about what happened that night is as part of 2.0 this Inquiry? 21 A. That's right. 2.2 Q. Thank you. 23 Turning then, as best you can, given that, to the
  - working arrangements which were in place that night. So
- 25 if we turn to paragraph 3 of your statement, which is on

2.2

1	page 1 {INQ010214/1}, you say right at the bottom of the
2	page:
3	"I cannot remember whether I was working remotely or
4	working in the BFMCC but I know that my colleague
5	Karen Whitehouse, a BF higher officer, was working in
6	the BFMCC that night."
7	Is that still your evidence now? You can't remember
8	yourself whether you were there in person or whether you
9	were working remotely?

10	Λ	If	i+	wasn't for	tho	transcripts.	otc	l wouldn't

- 11 have -- I wouldn't be able to recall where I was three
- 12 and a half years ago. Having looked at the rosters from
- 13 that time period, for example, the night before, which
- 14 had been assessed as a green night, I was working from
- 15 home. We just had the one in the office, but for that
- 16 night, because it's an amber assessed night, the two of 17 us were in the office.
- 18 Q. Is that something you remember or is that something you 19 have logically deduced must have been the case from the 20 RAG rating for that night, the red-amber-green rating?
- 21 A. A combination. That and one of the transcripts, which
- 2.2 shows that the night before, we had a telephone 23 conversation when I was working from home and Karen was
- 24 in the office.
- 25 Q. Okay. Can I take you to the second statement of

21

1		Karen Whitehouse, $\{INQ10698/2\}$ , paragraph 4, page 2,
2		please. She says at the very bottom of that paragraph:
3		"The expectation of Border Force Maritime Command
4		was that BFMCC personnel would be physically based
5		at the BFMCC on 'red days' or 'amber days', however, we
6		were able to work some shifts remotely on 'green days',
7		when the demands of Op Deveran would allow us to do so."
8		Do you agree that that was the working arrangement
9		for remote work at the time?
10	Α.	That's correct, yes.
11	Q.	Now, we have heard evidence that the evening of the 23rd
12		was amber and overnight in the 24th, it became a red
13		day. Is that the basis on which you say you were likely
14		to have been in person at the office that day?
15	Α.	Based on the RAG system, did you say?
16	Q.	Yes, in that the rule seems to have been you should be
17		physically based at BFMCC on red days or amber days, as
18		it says at paragraph 4 there.
19	Α.	Yes. Yes, that's correct. We were both in the office
20		on the 23rd because it was amber. I think if 1 $$ the
21		following day, the 24th, Karen was on leave, so it was
22		just me on the red night working on my own, so $$ but
23		that was the agreement. If it was red or amber and
24		there was two of us on duty, we would both be in the

- there was two of us on duty, we would both be in the
- 25 office .

22

- Q. I think, in fact, it became a red night during your 1 2 shift that evening overnight. Is that something you 3 remember? 4 A. I don't recall , only from the -- from that day's planning document which reflected that. 5 Q. Understood. 6 7 I think you mentioned earlier when you were talking 8 about your understanding of whether you were in the 9 office or out that you had seen rosters for the day; is 10 that right? 11 A. Yes, yes, yes. We have -- we obviously have a team 12 roster. 13 Q. I don't think that's something the Inquiry has had 14 disclosed to it. Is that a document you looked at in 15 preparation for today's evidence? 16 A. Only when I was trying to clarify whether I was on duty 17 or not. so --18 Q. Understood. 19 A. -- yes, I saw it then. 20 Q. Can I take you to the first statement of 21 Karen Whitehouse, which talks a little bit about
- communications that night. Paragraph 43, page 19, 23 please,  $\{INQ010135/19\}$ . So Ms Whitehouse says:
- 24 "If I needed to communicate with Mr Willows then
- 25 I would have done so by mobile telephone."

#### 23

1		I think that might be higher up in paragraph 43.
2		I think, in fact, paragraph 43 begins on the previous
3		page, if we go right to the bottom of the previous page.
4		Thank you very much {INQ010135/18}:
5		"If I needed to communicate with Mr Willows
6		I would have done so by mobile telephone."
7		Going across on to the next page.
8		Now, at that stage, I believe when she wrote that,
9		looking at the rest of that paragraph, she was under the
10		impression that you were working remotely that night.
11		If you were in the office together, is it right you
12		would have been speaking to one another rather than
13		speaking by phone?
14	Δ	Yes, that's correct, yes. We sat next to each other, so
15	73.	yes.
16	0	She goes on to say {INQ010135/19}:
17	Q.	"I cannot recall contacting him that night and have
18		not located any emails between us. Given that we would
19		have agreed who was doing which tasks, there would not
20		have been a need to speak unless either of us had
20		
		a query."
22		Was that the normal arrangement when you were
23		working remotely; that you wouldn't expect to speak to
24		one another in the course of the night?
25	А.	If it was a green night $$ so I think there was some

- 1 initial confusion when Karen made her first statement as
- 2 to whether we were both in the office or not, so I think
- 3 she subsequently updated that.
- 4 So if it was a green night and one of us was working
- at home, then we would have a conversation at the start 5
- of the shift, see what was going on, decide who was 6
- 7 going to -- what the person working at home was going to
- be doing. But yes, if we needed to speak, then 8
- 9 obviously it would be done by telephone.
- 10 Q. But is it right that when you were working remotely on
- 11 a green night, you wouldn't normally expect to speak to
- 12 one another unless there was a query? It wouldn't be
- 13 unusual not to speak to one another in the shift.
- 14 A. Yes, that's correct, yes.
- 15 Q. Can I ask you about the division of responsibilities 16
- between the two of you. So I think you mentioned 17 earlier that you might choose to divide the work between
- 18 one person doing essentially the calls and the other
- 19
- doing the recording and the information management. Is 20 that a fair description?
- 21
- A. Yes.

25

- 2.2  $\mathsf{Q}.\;$  Was that a standard arrangement or was it something that 23 was different night by night or morning by morning,
- 24 depending which shift you were assigned to?
  - A. Certainly for us, the way we worked, we always had

# 25

- 1 a conversation at the start of the shift, so we would probably alternate it. So, you know, the first shift, 2 3 Karen was looking after the recording, case register, 4 etc. Then the next time we were on shift together, we 5 would probably swap round. So yes, that was the standard arrangement. 6  $\mathsf{Q}.\;\;\mathsf{Can}$  we turn to paragraph 35 of this statement, please, 7 same document, page 15 {INQ010135/15}. She says right 8 9 at the very bottom: 10 "Although I cannot recall ... " 11 Then going over on to the next page {INQ010135/16}: 12 "... I would expect that my colleague working 13 remotely and  ${\sf I}$  agreed at the beginning of the shift that he would do the 'business as usual' work including 14 15 emails, reports etc. and I would focus on Op Deveran and 16 looking after the assets." 17 Does that sound right to you in terms of the 18 allocation of work on the night of the 23rd to the 24th? 19 A. I think that's -- well, no, because that refers to 2.0 working remotely. We were both in the office, so 21 that's -- no. that's not correct. no. 2.2 Q. I think in her evidence on Tuesday, the position was 23 a little bit different. Rather than you doing business 24 as usual, emails and reports and her looking after 25 Op Deveran and the assets, I understood her evidence to
  - 26

while she was taking responsibility for the information 2 3 management side, inputting into the trackers. 4 A. Yes, that's correct. We were both focused on Op Deveran 5 on that night. It was an amber night. We knew it would be busy night. So yes, that's the way it was split. 6 7 Q. Is that something you actually remember now or is that something you are basing on her evidence? 8 9 A. I certainly don't recall the conversation at the start 10 of the shift, but that's based on the transcripts, and 11 it's clear from that how we were running the shift. 12 Q Understood. So it's based on having seen the 13 transcripts and you taking a number of calls on the 14 night; is that right? 15 A Correct  $\mathsf{Q}.\;$  How long were your shifts in November 2021? 16 17 A. Generally nine/nine and a half hour shifts with 18 a handover factored in. 19 Q. Okay. Can I take you to paragraph 44 of this same 20 document, page 19, I believe {INQ010135/19}. It says: 21 "The shift involved working through without 22 an official break – the break is taken at the end of the 23 shift because of the nature of the work. Comfort breaks

be that you were taking responsibility for the calls

- 24 are possible by diverting the phones to the mobile and
- 25 taking the airwave handset too. There are opportunities

27

1		to have a snack without leaving any comms unattended."
2		Now, I think her position in oral evidence on
3		Tuesday was a little different to that again, but I want
4		to understand what your experience was. Do you remember
5		working through without official breaks?
6	Α.	Generally that's what we $$ that's what we did. We
7		would eat our meals at the desk. The bit about
8		diverting phones, etc, to the official mobile, that
9		would be if you were solo working. If there was just
10		one person in the office , if you obviously needed to go
11		to the toilet , take a five $/{\mbox{ten}}-{\mbox{minute break}},$ comfort
12		break, then you had the option of diverting the phones,
13		etc, and taking a radio. Obviously when there was two
14		of you in the office , then there was no requirement to
15		do that. But yes, certainly we generally worked through
16		our shift .
17	Q.	Did you often find yourself working solo in that period?
18	Α.	Fairly frequently. We were $$ there was only $$ the MCC
19		is a small team. We were basically five teams of
20		two people. So you only need one person to be on leave
21		or on a training course and you are solo working, so it
22		wasn't uncommon.
23	Q.	And it may seem obvious, but if you were solo working on
24		a given night, were you then responsible for both calls
25		and communicating with stakeholders and assets and the

1 information management responsibilities, the live

- 2 updates and the trackers?
- 3 A. Yes, that would be the case.
- 4 Q. Whereas normally that would be a two-person task.
- 5 A. Correct.
- Q. I want to turn now and ask a little bit about that 6
- 7 information sharing role, if I can; how information was recorded within your office and how it was shared with 8
- 9 others.
- 10 Within the Home Office, we know that you had
- a Border Force tracker which had a title called "live 11
- 12 updates", and we have spoken a little bit about that
- 13 alreadv
- 14 A. Mm.
- 15 Q. There was also something called an Op Deveran case 16 register .
- 17 A. (Nods).
- 18 Q. I don't think we need to go to that document itself.
- 19 It's quite a large spreadsheet.
- 20 A. Uh-huh.
- 21 Q. We have heard from Karen Whitehouse on Tuesday that it
- 22 was different to the Border Force tracker because it was
- 23 only filled in once an M number or a Mike number was
- 24 assigned to an incident. Could you talk us through 25
  - that? At what stage was the case register coming in?

29

- 1 How was it different to the Border Force tracker?
- 2 A. So the tracker or the live events update was basically
- 3 a mirror of the coastguard tracker, so it would reflect
- 4 every single event that was open, but because, yes, on
- 5 some days, they would go round the alphabet two or
- three times, we would only actually put an event on to 6 7
- our official case register once a migrant vessel had 8 been picked up, and at that point was when the Mike
- 9 number was issued, so only then, from our point of view.
- 10 did it become an official record, so to speak. So
- 11 that's when we created -- obviously it was given the
- 12 Mike number and that's when we entered it on to our case
- 13 register
- $\mathsf{Q}.\;$  So at the start, you were looking at HM Coastguard's 14 15 tracker to obtain information: is that right?
- 16 A. That's correct.
- 17 Q. Was that information then used to inform the
- 18 Border Force tracker, the live updates; is that right?
- 19 A. That's correct.
- 20 Q. And then where was the information for the case register 21 taken from?
- 2.2 A. Essentially from the tracker, whether it was the
- 23 coastguard tracker or from our live events update. It
- 24 would be a combination of the two reports which then fed
- 25 into our case register .

30

- 1 Q. So were you taking information from both the
- Border Force tracker and HM Coastguard's tracker to feed 2
- 3 into the case register once an incident had an M or Mike
- 4 number assigned?
- A. That's correct. 5
- Q. I want to ask you a little bit about HM Coastguard's 6
- 7 tracker, if I can. You have already told us it was the
- first point of information on anything. It's where you 8
- 9 would first see information about incidents; is that
- 10 right?
- 11 A. Yes, the -- well, either the coastguard tracker or the 12 French Gris-Nez tracker. We received copies of that as
- 13 well, so sometimes we would get indication on there that
- 14 there was activity in French waters before it was, yes,
- 15 on the coastguard tracker. So yes, that's the first we
- 16 got the heads-up, so to speak, from either Gris-Nez or
- 17 from the coastguard tracker.
- 18 Q. And were you getting the Gris-Nez tracker from the
- 19 coastguard or from a different source?
- 20 A. We received it direct from Gris-Nez.
- 21 Q. Direct from Gris-Nez. Did you then share it with
- 22 HM Coastguard or were they also receiving it directly 23 from Gris-Nez?
- 24 They received it themselves direct from Gris-Nez. Α
- 25 Q. I want to ask you a little bit about how you interacted

31

- 1 with the tracker of HM Coastguard. Could we turn to 2  $\{INQ010631/1\}$ , please. This is an email from the 3 20 November 2021. We can see text pasted into the 4 bottom of the email from both yourself and 5 Karen Whitehouse and a person whose name has been 6 redacted. You say at 6.02: 7 "Morning ... Me and Karen on earlies here." 8 Is it right that that was an instance where you were 9 working a morning shift as opposed to an overnight 10 shift? 11 A. Yes, 06.12, that would be an early shift, yes. 12 Q. If we look further down towards the bottom, we can see 13 you making a number of requests for the tracker. So you 14 say 15 "Can we have another [HM Coastguard] tracker 16 please ... " 17 Moving down: 18 "Thanks." 19 "Is there another tracker please ... " 2.0 And again: 21 "Thanks for tracker." 2.2 Why were you asking for the tracker at that stage? 23 Did you have access to it yourself on the 20th? 2.4 Not on the 20th -- well, obviously not if I was asking Α
- 25 for it . I believe we only literally were given access

- 1 to it the day or two before the night of the incident.
- 2 So at that stage on the 20th, we would not have had
- 3 access to the coastguard tracker, no.
- 4  $\mathsf{Q}.\;$  And at that stage, how did you obtain the tracker? We 5 can see requests being made to someone within
- 6 Border Force. Did they have access to the coastguard 7 tracker?
- 8 A. I think that would be -- that email is going to --9 sorry , who's that conversation with again? It's --
- 10 Q. So it's a person within the Border Force --
- 11
- A. Sorry, yes, sorry. So that was with the CGLO. That was 12 our -- that was the Border Force liaison officer based
- 13 at, you know, the JCR in Dover. So -- so they had
- 14 access to the coastguard tracker, but we didn't in the
- 15 MCC
- Q. And they were not based in your office. They were based 16 17 in a separate office in Dover.
- 18 A. They were in the JCR at Dover.
- 19 Q. They were in the JCR.
- 20 A. Yes, yes.
- 21 Q. So any time you needed to see a tracker at this stage --
- 2.2 A. Yes.
- 23  $\mathsf{Q}.~--$  you had to make a request for an updated version; is
- 24 that right?

25 A. That's correct.

#### 33

1 Q. Can I ask that we turn to  $\{INQ010633/1\},$  please. We 2 have a similar email, but this time from 22 November in 3 the evening, 11.24 pm. Once again, we have got yourself 4 and Karen Whitehouse speaking there. It looks like this 5 is the shift the night before 23 to 24 November; is that 6 right? 7 A. Yes, that's correct. So that evening, I believe I was 8 working from home. 9  $\mathsf{Q}.\;$  So if you go about halfway down the page, we can see 10 Karen Whitehouse says: 11 "Debriefs- just read the last comments from 12  $\left[ {\text{redacted name}} \right]$  about MCC/CGLO confusion. Wonder what 13 he's referring to?" 14 Do you have any recollection what this is about at 15 all? 16 A. No, no idea. 17 Q. Is it fair to say CGLO is HM Coastguard's liaison 18 officer that we were just speaking about? 19 A. Well, the Border Force liaison officer working with the 20 coastguard. 21 Q. Understood. 22 You say: 23 "Not really sure ..... i do wonder if there are too 24 many people involved sometimes though." 25 Do you know what you meant by that? Are you able to

34

1		tell us now?
2	Α.	No, no recollection what that conversation was $$ was
3		based on, no.
4	Q.	Carrying down a few entries, Karen Whitehouse says,
5		23.19:
6		"I wonder if now we have access to the [coastguard]
7		tracker if we need a CGLO?"
8		So by this stage, we can see you do have access to
9		the coastguard tracker; is that right?
10	Α.	Yes, that's correct.
11	Q.	So certainly by the 22nd, the shift before, you had
12		access to the tracker. It seems likely you gained
13		access sometimes $$ sometime between the morning of the $% \left( {{{\mathbf{x}}_{i}}^{2}} \right)$
14		20th and the evening then of the 22nd.
15	Α.	Yes.
16	Q.	Can we turn to another document, please, {INQ010640/1},
17		starting at page 3, if we can, please $\{INQ010640/3\}$ .
18		This is an email chain within Border Force Maritime
19		Command and we can see there an email on 19 November at
20		1.57. It starts:
21		"Dear all,
22		"In the light of the last few manic Deveran
23		shifts Just wanted to make a suggestion on the new
24		live updates and the case register in general, as there
25		are some variances in how we are operating as teams.
		35

1	I think it's important that we produce consistent
2	output, so we probably need a bit of a tune up in some
3	areas."
4	Can I ask: the live update system that you have been
5	telling us about, was it new at that stage?
6	A. I don't recall when it came into $$ into use.
7	Q. Okay. Could we go then to page 1, please of this
8	document, {INQ010640/1}. We can see at the top this is
9	a chain forwarded to you by Karen Whitehouse on
10	21 November, 6.06 in the morning:
11	"Tom
12	"FYI."
13	And below we can see an email from Border Force
14	Command on 20 November. It says, several lines down:
15	"Hopefully by close of play tomorrow all MCC staff
16	will be granted permission to the MCGA share point which
17	will allow live continuous access to the [coastguard]
18	Tracker.
19	"This will prevent chasing and allow us to update as
20	we go rather than being bombarded with multiple events
21	sporadically .
22	"This should ease pressure on our hourly update, but
23	again we can only report what we know or are told."
24	And it says this is being done as a trial :
25	"We should trial run this and if there are still

- 1 concerns we can revisit this."
- 2 Looking at that, having seen these documents that
- 3 give some context, are you able to tell us now: do you
- 4 have any recollection yourself of when you got access to 5 the coastguard tracker?
- 6 A. Yes, as we established, it looks like it was some time 7 between the 20th and the 23rd. So whether it's the 21st
- 8 or the 22nd, I don't know for definite which day it was,
- 9 but yes, one of those two days, a day or so before the
- 10 night -- the night in question.
- 11- Q. So it was a new system, effectively, on 23/24 November?
- 12  $\,$  A. Yes, for us to have direct access to it , yes.
- $13\,$   $\,$  Q. And do you remember now, so using your recollection,
- $14 \qquad$  whether you were given full access to the coastguard
- 15 tracker or read—only access? So what I am asking is: do 16 you remember whether you had the ability to make any 17 changes to that document?
- 18 A. My recollection is initially , we only had read-only
- 19 access. I don't know when we were given full -- full
- 20  $\qquad$  access, but certainly initially , with it being a new
- 21 system, it was read-only.
- 22 Q. Can I take you to a document {INQ007058/1}, please. We 23 need to wait a second to bring it up on the computer.
- 2.3 need to wait a second to bring i 2.4 There we are
- 25 This is a register of changes made to

#### ter of changes mad

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- $1 \qquad {\sf HM}$  Coastguard's tracker on the night of 23 to
- $2 \qquad \ \ 24$  November 2021. We can see the different columns. We
- 3 can see "Change Date" and "Change Author". And there is
- $4 \qquad \qquad$  just one entry from you that night, which is line 17,
- 5 item number 17. In fact, I think, yes, it's row 18, and
- 6 we can see on the 24th at 2.23 in the morning,
- 7 thomas.willows@homeoffice.
- 8 Looking at this, do you accept that you had change
- 9 access on the night, the ability to amend the tracker 10 itself ?
- A. As I said, my -- my recollection is we had read-only
   access initially. Whether that's when we would have
   logged on to the tracker -- I don't know if that's the
- 14 only entry from me, because by that time at night, we
- 15 certainly weren't issuing any M numbers. So there's no
- 16 reason that I would have been editing that document,
- 17 so -- so I can't answer, but I thought we had read-only 18 access, so ...
- Q. Are you saying that from 2.23 in the morning onwards,
- 20 you weren't issuing any further M numbers, for instance?
- 21 A. No, no, I am saying stage, there hadn't been any
- 22 M numbers issued --
- 23 Q. Understood

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- 1 Q. Is it right that your shift would have started around
- 2 7.30/8 o'clock that night?
- 3 A. About 8.30/8.45, yes.
- 4  $\quad$  Q. Can it be right that for the first six hours of your
- 5 shift, a little more, you hadn't logged on to look at 6 the coastguard tracker?
- A. If there had been no activity -- Karen had -- Karen had
   logged on earlier in the shift, and we generally only
- 9 accessed it once we needed to, once there was ongoing
- 10 events. Obviously, Valiant was tasked, was it, 1.30 in
- 11 the morning, I believe, so it was only round about then
- 12 when we became involved in events. So it was round
- 13 about then when we really required access to the
- 14 tracker. I wouldn't necessarily have accessed it if
- 15 there wasn't any events going on.
- 16 Q. How would you know whether there are events going on if
- 17 you weren't logged in to check the tracker before that 18 stage?
- 19 A. Well, the coastguard would contact us as and when they
- $20\,$  needed an asset for tasking, and also we would have seen
- 21 any emails from Gris-Nez once they started coming in.
- 22 We would have started getting indication that there was 23 activity going on.
- 24 Q. So you weren't checking the tracker from HM Coastguard
- 25 until you had a notification from them, like a phone

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- 1 call, or something on the Gris-Nez tracker to indicate 2 that you should then go and check? 3 A. Possibly. As I say, this was a brand new document --4 a brand new system that we had access to. So yes, I am 5 not  $--\ensuremath{\mathsf{I}}$  can't say how we were accessing it and how we 6 were running the coastguard tracker that early on, 7 whether we would have -- as it went on, as time went on,  ${\sf I}\,$  am sure we would have started logging in straight 8 9 away, but if there was no activity going on, there would 10 have been no -- no necessity for us to have been logged 11 into it at that stage. 12 Q. Do you now remember whether or when you logged in that 13 night --14 A. No. I do not. 15 Q. -- or whether or when you might have checked the tracker 16 that night? 17 A. No, I don't know. 18 Q. You have told us about a range of different trackers. 19 We have talked about Border Force tracker, the case 2.0 register, the HM Coastguard tracker, the Gris-Nez 21 tracker. I think there is also a thing called a ViSION 2.2 log which the HM Coastguard were using to record
- 23 information. Was that something you were aware of?
  - A. We didn't have access to that, no.

24

25~ Q. Were you aware that it was being used? Did you know

1	about it?
2	A. I have heard of it, but it's a coastguard system which
3	we wouldn't have access to, so no.
4	Q. Did you find that working across multiple different
5	trackers, $\operatorname{copy}/\operatorname{pasting}$ information between them, that
6	that could create confusion or inconsistencies?
7	A. I don't believe that was the case. I think we $$ we
8	knew the importance of our reporting, obviously how
9	accurate it had to be. So certainly from our $$ from
10	our point of view, yes, we all took the reporting
11	seriously and it was a $$ it was a primary part of our
12	role.
13	MS WOODS: Understood.
14	Sir, would that be a convenient moment to break?
15	SIR ROSS CRANSTON: Yes.
16	MS WOODS: Thank you very much.
17	SIR ROSS CRANSTON: So 10 minutes.
18	(10.54 am)
19	(A short break)
20	(11.05 am)
21	SIR ROSS CRANSTON: Yes, Ms Woods.
22	MS WOODS: Thank you very much, chair.
23	Mr Willows, before the break, we were discussing the
24	different methods of recording information as part of
25	your role. Another method of recording information was
	41
1	the daybook.
2	Can we turn please to your statement, $\{INQ010214/2\}$
3	at paragraph 4. That's page 2, I believe. Thank you

2		Can we turn please to your statement, $\{INQ010214/2\}$
3		at paragraph 4. That's page 2, I believe. Thank you
4		very much.
5		We received as part of the Inquiry daybooks from
6		Karen Whitehouse, which we have gone to in evidence, and
7		from Commander Toy, but we don't have a daybook from
8		you. Looking at this paragraph, you say:
9		"It is an individual officer's decision as to what
10		information they record in their daybook. I have
11		checked my daybook and I have not made any notes during
12		my shift on $23/24$ November 2021. This is not unusual
13		for me; I tend to record information directly onto Home
14		Office systems, if relevant. Using my daybook is rare,
15		given the ever-increasing move to electronic records.
16		Where I did use my daybook, it was typically to record
17		specific incidents which were relevant for law
18		enforcement purposes, rather than 'business as usual'
19		matters such as migrant crossings."
20		Looking at this, does that mean that you didn't use
21		your daybook at all on the shift from 23 to
22		24 November 2021?
23	Α.	That's correct.
24	Q.	And, in fact, if we go further down the paragraph, you
25		say that you didn't use your daybook at all between,

1		I think, 1 August 2021 and 28 April 2022; is that right?
2	Α.	That's correct.
3	Q.	${\sf I}$ think you say in the middle of the paragraph there it
4		was typically used for law enforcement purposes rather
5		than small boats; is that right?
6	Α.	That's right.
7	Q.	Was that your understanding at the time?
8	Α.	Yes.
9	Q.	And you understood that it was a matter for your
10		discretion whether or not you used the daybook at all?
11	Α.	Yes, that's correct.
12	Q.	Could we turn, please, to $\{INQ010666/1\},$ please. This
13		is the Operation Deveran standard operating procedures
14		which were in place at the relevant time.
15		Mr Willows, is this a document you were familiar
16		with in your role?
17	Α.	Yes.
18	Q.	Is this essentially the role which governs the way you
19		do your job for Operation Deveran matters?
20	Α.	That's correct.
21	Q.	Thank you very much.
22		Could we turn to page 6 {INQ010666/6}, please. We
23		can see a section in the middle of the page titled
24		"Recording of decisions" and it says:
25		"Decisions made in relation to this operation must
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1		be recorded in appropriate documents as soon as is
2		reasonably practicable (Day book, Ships log and/or
3		pocketbook). This should include the supporting
4		rationale for the decision made."
5		It's fair to say you weren't on a cutter, so you
6		weren't filling in a ships log; is that right?
7	Α.	Correct.
8	Q.	And did you have a pocket book?
9	Α.	No, just a daybook.
10	Q.	Just a daybook, okay.
11		Could we go to page 7, please {INQ010666/7}. We can
12		see at the top there:
13		"MCC officers"
14		Were you an MCC officer at the time?
15	Α.	Yes.
16	Q.	"MCC officers must record their decisions and actions
17		taken in day books."
18		And it goes on:
19		"MCC officers are responsible for providing timely,
20		accurate and updates to partner agencies and
21		departments, and compile case files and a register."
22		Could we turn one more to page 14, please
23		$\{{\sf INQ010666}/{\sf 14}\}.~$ There is a heading titled "Day book
24		entries". It says:
25		"SOLAS 1974"

25

1		I think that's safety of life at sea; is that right?
2		Yes.
3	Q.	" and Criminal Procedures and Investigations Act 1996
4		(Record/Retain/Reveal) require all actions and decision
5		making to be recorded. Day book entries must be in
6 7		chronological order, factual, and accurate, with
		awareness that these may be used in evidence."
8 9		So this is referring not only to CPIA, to the law
9 10		enforcement element, but also to SOLAS, to search and rescue, safety of life at sea; is that right?
11	۸	Yes, correct.
12		You accept you weren't compliant with this requirement
13	ų.	to be recording your decisions and your rationale in the
14		daybook at the relevant time?
15	Δ	The way we $$ the way things were run in the office, all
16	73.	entries were put directly on to the electronic updates
17		and case register. So I personally didn't run
18		a daybook, but all information or details that I took
19		were put directly on to the electronic records that were
20		kept. So they were all, yes, completed timely and
21		accurately, but the electronic version as opposed to
22		into a daybook.
23	Q.	You didn't have an electronic daybook. You are talking
24		about the trackers, aren't you?
25	Α.	Yes, the live update tracker and the case register.
		4 5
		45
1	Q.	
1 2	Q.	But you have told us that this is the document which
	Q.	
2	Q.	But you have told us that this is the document which governed the way you did your job at the time and you
2 3	Q.	But you have told us that this is the document which governed the way you did your job at the time and you have told us this is a document you were familiar with.
2 3 4		But you have told us that this is the document which governed the way you did your job at the time and you have told us this is a document you were familiar with. This document says you must be recording in your
2 3 4 5		But you have told us that this is the document which governed the way you did your job at the time and you have told us this is a document you were familiar with. This document says you must be recording in your daybook, doesn't it?
2 3 4 5 6		But you have told us that this is the document which governed the way you did your job at the time and you have told us this is a document you were familiar with. This document says you must be recording in your daybook, doesn't it? The work around Op Deveran was evolving the whole time.
2 3 4 5 6 7		But you have told us that this is the document which governed the way you did your job at the time and you have told us this is a document you were familiar with. This document says you must be recording in your daybook, doesn't it? The work around Op Deveran was evolving the whole time. When it started, incidents were few and far between,
2 3 4 5 6 7 8		But you have told us that this is the document which governed the way you did your job at the time and you have told us this is a document you were familiar with. This document says you must be recording in your daybook, doesn't it? The work around Op Deveran was evolving the whole time. When it started, incidents were few and far between, back in —— back in 2018 when it all started, but by this
2 3 5 6 7 8 9		But you have told us that this is the document which governed the way you did your job at the time and you have told us this is a document you were familiar with. This document says you must be recording in your daybook, doesn't it? The work around Op Deveran was evolving the whole time. When it started, incidents were few and far between, back in —— back in 2018 when it all started, but by this stage, 2021, as you are aware, there were multiple
2 3 4 5 6 7 8 9 10		But you have told us that this is the document which governed the way you did your job at the time and you have told us this is a document you were familiar with. This document says you must be recording in your daybook, doesn't it? The work around Op Deveran was evolving the whole time. When it started, incidents were few and far between, back in — back in 2018 when it all started, but by this stage, 2021, as you are aware, there were multiple events, crossings per shift and the amount of reporting and recording became quite substantial. So it just — our work evolved in the office and certainly me
2 3 4 5 6 7 8 9 10 11 12 13		But you have told us that this is the document which governed the way you did your job at the time and you have told us this is a document you were familiar with. This document says you must be recording in your daybook, doesn't it? The work around Op Deveran was evolving the whole time. When it started, incidents were few and far between, back in — back in 2018 when it all started, but by this stage, 2021, as you are aware, there were multiple events, crossings per shift and the amount of reporting and recording became quite substantial. So it just — our work evolved in the office and certainly me personally — I think most people within the team, we
2 3 4 5 6 7 8 9 10 11 12 13 14		But you have told us that this is the document which governed the way you did your job at the time and you have told us this is a document you were familiar with. This document says you must be recording in your daybook, doesn't it? The work around Op Deveran was evolving the whole time. When it started, incidents were few and far between, back in — back in 2018 when it all started, but by this stage, 2021, as you are aware, there were multiple events, crossings per shift and the amount of reporting and recording became quite substantial. So it just — our work evolved in the office and certainly me personally — I think most people within the team, we were recording directly on to the electronic records to
2 3 4 5 6 7 8 9 10 11 12 13 14 15	A.	But you have told us that this is the document which governed the way you did your job at the time and you have told us this is a document you were familiar with. This document says you must be recording in your daybook, doesn't it? The work around Op Deveran was evolving the whole time. When it started, incidents were few and far between, back in — back in 2018 when it all started, but by this stage, 2021, as you are aware, there were multiple events, crossings per shift and the amount of reporting and recording became quite substantial. So it just — our work evolved in the office and certainly me personally — I think most people within the team, we were recording directly on to the electronic records to save duplicating all the information.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	A.	But you have told us that this is the document which governed the way you did your job at the time and you have told us this is a document you were familiar with. This document says you must be recording in your daybook, doesn't it? The work around Op Deveran was evolving the whole time. When it started, incidents were few and far between, back in — back in 2018 when it all started, but by this stage, 2021, as you are aware, there were multiple events, crossings per shift and the amount of reporting and recording became quite substantial. So it just — our work evolved in the office and certainly me personally — I think most people within the team, we were recording directly on to the electronic records to save duplicating all the information. We can see that this document requires you to record
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	A.	But you have told us that this is the document which governed the way you did your job at the time and you have told us this is a document you were familiar with. This document says you must be recording in your daybook, doesn't it? The work around Op Deveran was evolving the whole time. When it started, incidents were few and far between, back in — back in 2018 when it all started, but by this stage, 2021, as you are aware, there were multiple events, crossings per shift and the amount of reporting and recording became quite substantial. So it just — our work evolved in the office and certainly me personally — I think most people within the team, we were recording directly on to the electronic records to save duplicating all the information. We can see that this document requires you to record your decision—making and your rationale for that
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	A.	But you have told us that this is the document which governed the way you did your job at the time and you have told us this is a document you were familiar with. This document says you must be recording in your daybook, doesn't it? The work around Op Deveran was evolving the whole time. When it started, incidents were few and far between, back in — back in 2018 when it all started, but by this stage, 2021, as you are aware, there were multiple events, crossings per shift and the amount of reporting and recording became quite substantial. So it just — our work evolved in the office and certainly me personally — I think most people within the team, we were recording directly on to the electronic records to save duplicating all the information. We can see that this document requires you to record your decision—making and your rationale for that decision—making in the daybook. Are you telling us that
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	A.	But you have told us that this is the document which governed the way you did your job at the time and you have told us this is a document you were familiar with. This document says you must be recording in your daybook, doesn't it? The work around Op Deveran was evolving the whole time. When it started, incidents were few and far between, back in — back in 2018 when it all started, but by this stage, 2021, as you are aware, there were multiple events, crossings per shift and the amount of reporting and recording became quite substantial. So it just — our work evolved in the office and certainly me personally — I think most people within the team, we were recording directly on to the electronic records to save duplicating all the information. We can see that this document requires you to record your decision—making and your rationale for that decision—making in the daybook. Are you telling us that you were recording your decision—making and your
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	A.	But you have told us that this is the document which governed the way you did your job at the time and you have told us this is a document you were familiar with. This document says you must be recording in your daybook, doesn't it? The work around Op Deveran was evolving the whole time. When it started, incidents were few and far between, back in — back in 2018 when it all started, but by this stage, 2021, as you are aware, there were multiple events, crossings per shift and the amount of reporting and recording became quite substantial. So it just — our work evolved in the office and certainly me personally — I think most people within the team, we were recording directly on to the electronic records to save duplicating all the information. We can see that this document requires you to record your decision—making and your rationale for that decision—making in the daybook. Are you telling us that you were recording your decision—making and your rationale for your decision—making in the Border Force
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	A. Q.	But you have told us that this is the document which governed the way you did your job at the time and you have told us this is a document you were familiar with. This document says you must be recording in your daybook, doesn't it? The work around Op Deveran was evolving the whole time. When it started, incidents were few and far between, back in — back in 2018 when it all started, but by this stage, 2021, as you are aware, there were multiple events, crossings per shift and the amount of reporting and recording became quite substantial. So it just — our work evolved in the office and certainly me personally — I think most people within the team, we were recording directly on to the electronic records to save duplicating all the information. We can see that this document requires you to record your decision—making and your rationale for that decision—making in the daybook. Are you telling us that you were recording your decision—making in the Border Force tracker, the live update spreadsheet?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Q.	But you have told us that this is the document which governed the way you did your job at the time and you have told us this is a document you were familiar with. This document says you must be recording in your daybook, doesn't it? The work around Op Deveran was evolving the whole time. When it started, incidents were few and far between, back in — back in 2018 when it all started, but by this stage, 2021, as you are aware, there were multiple events, crossings per shift and the amount of reporting and recording became quite substantial. So it just — our work evolved in the office and certainly me personally — I think most people within the team, we were recording directly on to the electronic records to save duplicating all the information. We can see that this document requires you to record your decision—making and your rationale for that decision—making in the daybook. Are you telling us that you were recording your decision—making and your rationale for your decision—making in the Border Force tracker, the live update spreadsheet? Well, if there was an HO on duty, then it was the HO
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	A. Q. A.	But you have told us that this is the document which governed the way you did your job at the time and you have told us this is a document you were familiar with. This document says you must be recording in your daybook, doesn't it? The work around Op Deveran was evolving the whole time. When it started, incidents were few and far between, back in —— back in 2018 when it all started, but by this stage, 2021, as you are aware, there were multiple events, crossings per shift and the amount of reporting and recording became quite substantial. So it just —— our work evolved in the office and certainly me personally —— I think most people within the team, we were recording directly on to the electronic records to save duplicating all the information. We can see that this document requires you to record your decision—making and your rationale for that decision—making in the daybook. Are you telling us that you were recording your decision—making in the Border Force tracker, the live update spreadsheet? Well, if there was an HO on duty, then it was the HO that was taking the decisions, making the decisions.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	A. Q. A.	But you have told us that this is the document which governed the way you did your job at the time and you have told us this is a document you were familiar with. This document says you must be recording in your daybook, doesn't it? The work around Op Deveran was evolving the whole time. When it started, incidents were few and far between, back in — back in 2018 when it all started, but by this stage, 2021, as you are aware, there were multiple events, crossings per shift and the amount of reporting and recording became quite substantial. So it just — our work evolved in the office and certainly me personally — I think most people within the team, we were recording directly on to the electronic records to save duplicating all the information. We can see that this document requires you to record your decision—making and your rationale for that decision—making in the daybook. Are you telling us that you were recording your decision—making and your rationale for your decision—making in the Border Force tracker, the live update spreadsheet? Well, if there was an HO on duty, then it was the HO

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- 1 together and taking decisions about asset allocation. 2 Where were you recording your decision-making and the 3 rationale for that? 4 A. I was recording the pertinent facts directly on to the 5 electronic live updates case register. Q. Just to be clear, I am not asking about the facts. Just 6 7 for the moment, I am asking about your decisions and the 8 reasons for making the decisions you made. Where was 9 that? 10 A. Well, I didn't have anything in the daybook. 11  $\mathsf{Q}. \quad \mathsf{Okay}. \quad \mathsf{We} \ \mathsf{can} \ \mathsf{take} \ \mathsf{this} \ \mathsf{down}.$ 12 I want to ask you now a little bit about the actual 13 night of the 23rd to 24th, and I appreciate you have 14 told us you are reliant on the written records and you 15 don't have an independent recollection, but I want to 16 take you to some of those records. if I can, to see what 17 you do remember and what you can assist us with. 18 A. Yes 19 Q. Could we start by looking at the statement of 20 Karen Whitehouse, the second one, 10698, at paragraph 6. 21 It is page 3, I believe {INQ010698/3}. At the very 22 bottom of that paragraph, Ms Whitehouse says: "I now believe that all telephone calls made by 23
- 24 BFMCC to HMCG, or received by BFMCC from HMCG, on the
  - night of 23/24 November 2021 were made or received by

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Mr Willows " 1 2 Do you agree with that? Were all phone calls made 3 or received by you? 4 A. Yes, to the best of my knowledge, yes. Q. Okay. Again, is that based on what you have seen of 5 6 some of the transcripts or is that your memory that you 7 were receiving all the calls? 8 A. I can't specifically recall the night itself , so it's 9 going -- going from transcripts. 10 Q. If we could turn to paragraph 12, page 4, please 11  ${INQ010698/4}$ . In this paragraph, Ms Whitehouse is 12 talking about calls made to or received from 13 Commander Toy, so communications with the Valiant. She 14 says: 15 "Given that I believe that Mr Willows was working 16 alongside me at the BFMCC, I consider that it is 17 currently impossible for me to confirm whether 18 Mr Willows or I made those calls." 19 Are you able to say now which of the two of you it 2.0 was who communicated with the Valiant on the night? 21 A. Not for definite. There's transcripts which clearly 22 have me involved in communications. Maybe Karen did 23 make a phone call, but I believe I made the majority of 24 any calls during that shift, but we might well have

> overlapped or Karen might well have made some herself. 48

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1	Q.	Understood.
2		Could we turn to Ms Whitehouse's first statement,
3		10135, paragraph 49, please {INQ010135/21}. It starts:
4		"The first entry in my daybook for [that date] is
5		timed at 01:12."
6 7		So 1.12 in the morning:
8		"It is a set of coordinates which I believe came from [HM Coastguard] by telephone. I was given the
° 9		coordinates [and then sets out the coordinates]. Next
10		to that entry I wrote 23:52Z which I think meant that
11		the coordinates given for the migrant boat were received
12		by [HM Coastguard] at 23:52."
13		Do you now have any memory of participating in any
14		call before 1.12 or at 1.12?
15	A.	No, I don't.
16		Okay.
17	•	Turning then to the next call, it's at 7648, please,
18		$\{INQ007648/1\}$ . We can see that this is a call which
19		took place around 1.20 on the morning of
20		24 November 2021. You can see there that there are
21		two speakers there. They have been identified in the
22		transcript as yourself and Stuart Downs.
23		Can I ask: do you remember making this call?
24	Α.	No, I don't.
25	Q.	Are you able to confirm whether the speaker on this call
		40
		49
1		49 was yourself, was you?
1 2	A.	
	A.	was yourself, was you?
2	A.	was yourself, was you? I have heard one audio recording of it. I don't know if
2 3	A.	was yourself, was you? I have heard one audio recording of it. I don't know if it 's this call. I have heard an audio recording from
2 3 4		was yourself, was you? I have heard one audio recording of it. I don't know if it's this call. I have heard an audio recording from a telephone call which was myself. I don't know if it
2 3 4 5		was yourself, was you? I have heard one audio recording of it. I don't know if it's this call. I have heard an audio recording from a telephone call which was myself. I don't know if it is this call or not.
2 3 4 5 6		was yourself, was you? I have heard one audio recording of it. I don't know if it's this call. I have heard an audio recording from a telephone call which was myself. I don't know if it is this call or not. Perhaps it would assist if we go to the next page,
2 3 4 5 6 7		was yourself, was you? I have heard one audio recording of it. I don't know if it's this call. I have heard an audio recording from a telephone call which was myself. I don't know if it is this call or not. Perhaps it would assist if we go to the next page, please {INQ007648/2}. Are you able to say whether the
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2 3 6 7 8 9 10 11	Q. A.	<ul> <li>was yourself, was you?</li> <li>I have heard one audio recording of it. I don't know if it's this call. I have heard an audio recording from a telephone call which was myself. I don't know if it is this call or not.</li> <li>Perhaps it would assist if we go to the next page, please {INQ007648/2}. Are you able to say whether the entries marked as "Tom Willows" here are in fact you on that call?</li> <li>Yes, I presume so, yes.</li> <li>Thank you very much.</li> </ul>
2 3 4 5 6 7 8 9 10 11 12	Q. A.	<ul> <li>was yourself, was you?</li> <li>I have heard one audio recording of it. I don't know if it's this call. I have heard an audio recording from a telephone call which was myself. I don't know if it is this call or not.</li> <li>Perhaps it would assist if we go to the next page, please {INQ007648/2}. Are you able to say whether the entries marked as "Tom Willows" here are in fact you on that call?</li> <li>Yes, I presume so, yes.</li> <li>Thank you very much.</li> <li>Looking at the transcript, it begins with some</li> </ul>
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. A.	<ul> <li>was yourself, was you?</li> <li>I have heard one audio recording of it. I don't know if it's this call. I have heard an audio recording from a telephone call which was myself. I don't know if it is this call or not.</li> <li>Perhaps it would assist if we go to the next page, please {INQ007648/2}. Are you able to say whether the entries marked as "Tom Willows" here are in fact you on that call?</li> <li>Yes, I presume so, yes.</li> <li>Thank you very much.</li> <li>Looking at the transcript, it begins with some information about the boat called Migrant 1 before turning to the subject of Charlie. So we can see about two-thirds of the way down the page, we turn to Charlie.</li> <li>Stuart Downs says:</li> </ul>
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. A.	<ul> <li>was yourself, was you?</li> <li>I have heard one audio recording of it. I don't know if it 's this call . I have heard an audio recording from a telephone call which was myself. I don't know if it is this call or not.</li> <li>Perhaps it would assist if we go to the next page, please {INQ007648/2}. Are you able to say whether the entries marked as "Tom Willows" here are in fact you on that call?</li> <li>Yes, I presume so, yes.</li> <li>Thank you very much.</li> <li>Looking at the transcript, it begins with some information about the boat called Migrant 1 before turning to the subject of Charlie. So we can see about two-thirds of the way down the page, we turn to Charlie.</li> <li>Stuart Downs says:</li> <li>"Not on the list and more of an issue is migrant 7 which I can give you a position for that."</li> </ul>
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. A. Q.	<pre>was yourself, was you? I have heard one audio recording of it. I don't know if it 's this call . I have heard an audio recording from a telephone call which was myself. I don't know if it is this call or not. Perhaps it would assist if we go to the next page, please {INQ007648/2}. Are you able to say whether the entries marked as "Tom Willows" here are in fact you on that call? Yes, I presume so, yes. Thank you very much. Looking at the transcript, it begins with some information about the boat called Migrant 1 before turning to the subject of Charlie. So we can see about two—thirds of the way down the page, we turn to Charlie. Stuart Downs says: "Not on the list and more of an issue is migrant 7 which I can give you a position for that." And you say: "Okay." We understand that Migrant 7 is the boat we have been calling Charlie. Is that also your understanding? Yes, I believe so.</pre>
2 3 4 5 6 7 8 9 10 11 12 13 14 5 16 17 18 19 20 21 22	Q. A. Q.	<pre>was yourself, was you? I have heard one audio recording of it. I don't know if it 's this call . I have heard an audio recording from a telephone call which was myself. I don't know if it is this call or not. Perhaps it would assist if we go to the next page, please {INQ007648/2}. Are you able to say whether the entries marked as "Tom Willows" here are in fact you on that call? Yes, I presume so, yes. Thank you very much. Looking at the transcript, it begins with some information about the boat called Migrant 1 before turning to the subject of Charlie. So we can see about two—thirds of the way down the page, we turn to Charlie. Stuart Downs says: "Not on the list and more of an issue is migrant 7 which I can give you a position for that." And you say: "Okay." We understand that Migrant 7 is the boat we have been calling Charlie. Is that also your understanding?</pre>

tell . And if we go over the page,  $\{INQ007648/3\}$ , we can 1 2 see: 3 "That's now, or about 10 minutes ago. And that's 4 supposedly from the -- according to the French at that, 5 when they told us about it, was ... 6 nautical miles from UK waters. I would imagine it's in UK waters by 6 7 now." 8 And he confirms that there is no French asset with 9 that boat. 10 We can see he gives some information about Migrant 7 11 or Charlie. You say: 12 " ... any further details?" 13 So you are asking for more information about this 14 boat, and he says 15 "There's 30 people on board, 14 have got life 16 jackets and supposedly there are 13 women, 8 children." 17 And he offers to give you a phone number. You say: 18 "Probably don't need it but go on." 19 Why was it your view that you didn't need phone 20 numbers for people on a boat? 21 A. Because we didn't get involved in that side of things. 2.2 So the coastguard -- when they were receiving phone 23 calls from the migrant vessels, it was the coastguard 24 that was receiving the phone calls, so they're obviously 25 logging the numbers. And then part of the process was 51 1 when the migrant vessels were picked up, part of the 2 process was they would request the Border Force crew to 3 check with the migrants if any of them had made a phone 4 call and then they would, you know, cross-reference any 5 phone numbers. So that's -- but that was done through 6 the coastguard. The coastguard would speak to Valiant 7 or whichever boat it was direct and request that 8 information. 9 Q. Were there ever any circumstances in which Border Force 10 would call a boat directly? 11 Α. Not in relation to phone numbers. Not that I was aware 12 of.  $\mathsf{Q}.\;$  Have you ever yourself made a call directly to a small 13 14 boat to obtain more information? 15 A. To a small boat, no. Never, no. 16 Q. I think these are the numbers for the people on the boat 17 is my understanding. 18 A. Yes, yes, that's --

- 19 Q. Would you ever call a boat yourself? No.
- 20 A. Yes -- no, no, we wouldn't do that. That would be 21 a coastguard job.
- 22 Q. Would you ever call a coastguard to request more
- 23 information proactively about an ongoing incident?
- 2.4 Yes, we would request updates, or if we saw something on Α 25
  - their tracker which we wanted, you know, further

1		information on, then we would contact the coastguard.
2	Q.	Thank you.
3		Looking down at the bottom of the page, we can see
4		Mr Downs saying:
5		"It's a dinghy and they think it's in good
6		condition."
7		And then if we turn over the page {INQ007648/4}, we
8		can see you seeking some more information and then
9		five entries down, you say:
10		"Okay, we'll plot it up and look at getting an asset
11		tasked to it then if it's in UK waters."
12		And you go on to say it's probably going to be the
13		Valiant because they are the primary responder.
14	Α.	Mm.
15	Q.	Who actually made the decision which asset to task
16		within Border Force or whether to task an asset in
17		response within Border Force?
18	Α.	So for that particular shift, that would have been
19		a discussion between me and Karen, once the coastguard
20		had requested an asset was tasked. From the day's
21		planning report, we obviously knew which was the primary
22		asset on standby. There was always two vessels on
23		standby, but we knew which was the primary boat. So
24		once the decision was made that tasking the boat was
25		appropriate, once that decision was made, then we would
		53
1		do so.
2	Q.	Is that something you remember doing or would that just
3		be your normal practice in response to an incident like
4		this?
5	Α.	That was our standard practice.
6	Q.	Standard.
7		Do you remember now what information you told
8		Karen Whitehouse in order to assist with making that
9		decision? What information from this call did you share
10		with her?
11	Α.	We would have reviewed the whole $$ the conversation.
12	Q.	Are you confident now that you told her everything that
13		you had been told on that call?
14	Α.	Yes. Yes, I would have told Karen anything and
15		even thing that was relevant to our $$ to the request

- everything that was relevant to our -- to the request and any decisions that were required.
- 17 Q. You say "would have". Again, are you saying that's your
  18 standard practice or you actually remember doing that on
  19 the night?
- 20
   A. I can't remember the night specifically, but I would be

   21
   confident from the way we worked what information would
- have been discussed.
- 23  $\,$   $\,$  Q. Could we turn back to her statement, her first  $\,$
- 24statement, 10135, please, at paragraph 16, which I think25is page 6 {INQ010135/6}.

1		In paragraph 16 $$ and you can have some time to
2		read this if you like $$ Ms Whitehouse is talking about
3		the different types of information that would be
4		relevant to share, what information is relevant for
5		making tasking decisions. So she talks about the
6		co-ordinates; the number of persons on board, which she
7		says is relevant to determining the appropriate asset;
8		the time of the sighting; the course; the direction; the
9		speed; mitigating factors like children being on board.
10		She mentions the type of boat and says:
11		" anything else which would assist BFMCC in terms
12		of allocating an asset and would assist the BFM crew in
13		locating and identifying the boat."
14		And then she says:
15		"Essentially we took as much information as we could
16		from [HM Coastguard] because when we contacted our
17		vessels we knew they would ask for the information."
18		Is that something you agree with in terms of what
19		the relevant information was to obtain?
20	Α.	Yes.
21	Q.	And is that the information you should have been asking
22		coastguard for as standard in responding to these
23		incidents?
24	Α.	Yes, that's correct.
25	$\cap$	She made on to cay at the ten of the next name

25 Q. She goes on to say at the top of the next page

# 55

1	{INQ010135/7}:
2	"In November 2021 some of this information would
3	initially be entered manually into the officer's
4	daybook. Relevant information would be transferred onto
5	the BFMCC spreadsheet log."
6	We know you weren't using your daybook at that time,
7	so I think we need to look at the log, $% \left( {{{\mathbf{r}}_{\mathbf{r}}}_{\mathbf{r}}} \right)$ is a set of the log $\left( {{\mathbf{r}}_{\mathbf{r}}} \right)$ is a set of the log $\left( {{\mathbf{r}}_{\mathbf{r}}} \right)$ .
8	is 471 {INQ000471/1}. So this is the covering email for
9	that document sent by Karen Whitehouse at 1.51 on the
10	morning of 24 November. You can see it is circulating
11	Operation Deveran live updates.
12	The spreadsheet itself is at 472 and if we could
13	turn to that, please {INQ000472/1}. Thank you very
14	much. We can see the time of that spreadsheet at the
15	top in blue:
16	"[TIME] 01:50]."
17	So this is the first Border Force tracker circulated
18	following that call with HM Coastguard timed at 1.50.
19	We can see that the coordinates from the call have been
20	entered here and the description states for Incident ${\sf C}$
21	for Charlie:
22	"No asset with event. Believed to already be in
23	UK waters. Valiant called."
24	Do you remember now who made that entry?

25 A. I don't remember specifically, no.

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1	~		-		
1	Q.	Okay.	1		to be important information that needed to be recorded?
2		We have some information from that call with	2	Α.	All that information would have been passed directly to
3		HM Coastguard here. We have the co-ordinates, for	3		the Border Force vessel that was tasked to the incident.
4		example. We have the fact that Valiant was being	4		It would have been provided to them by the coastguard
5		called, believed to already be in UK waters. But	5		direct, you know, on the radio. So it wasn't $$ it
6		there's important information from that call missing	6		wasn't essential for the purpose of this live update.
7		from this spreadsheet, isn't there?	7		The essential information was being passed direct to the
8	Α.	This spreadsheet, there is a $$ as the column says	8		assets that were tasked.
9		there, there is a brief description, an outline of $$ of	9	Q.	But, Mr Willows, it was yourself and Ms Whitehouse who
10		the event. So not all the details would have	10		tasked the Valiant to respond to this incident, wasn't
11		necessarily been put in at that stage. Some of it would	11		it?
12		have been added either later, but, yes, I $$ I can't	12	Α.	We gave them the initial tasking, but the coastguard
13		recall otherwise.	13		would then give them the specific information relating
14	Q.	I want to ask you about some specific pieces of	14		to the incident that they were tasked to.
15		information. So this document doesn't record, for	15	Q.	We have just been through paragraph 16 of
16		example, that there were 13 women on board,	16		Ms Whitehouse's statement, which lists the relevant
17		eight children, 14 people with life jackets, that it was	17		information to share with the Valiant at tasking, and
18		a dinghy which was underway, in good condition, any of	18		you have told me you agreed that that was important
19		the other identifying information obtained by you on	19		information to share, but that wasn't information which
20		that call, does it, Mr Willows?	20		you and Ms Whitehouse shared with the Valiant?
21	A.	lt doesn't, no.	21	A.	I don't recall what was specifically told on the when
22	Q.	You have told us you weren't using your daybook to	22		they were phoned and tasked. I can't comment on that.
23		record relevant facts. You were putting those relevant	23	Q.	Do you remember whether it was yourself or Ms Whitehouse
24		facts in the Border Force tracker. Where are they?	24		who actually tasked the Valiant that night?
25	A.	So most of the details that would have been passed by	25	A.	I can't $$ I can't recall without seeing the
		57			59

the coastguard on the telephone were on their tracker, so if further details were required, they could have been taken from the coastguard tracker, and this -- this live update spreadsheet was just a snapshot of the activity that was going on. This wasn't being used by the commanders of the vessels. They were receiving all their live updates from the coastguard direct once they were tasked to an event. So this actual report was just an overview which was being sent to our seniors and the RCCU who were responsible for deploying the shore-side response. So all the details may not have been recorded on here as it was just an overview at the time.  $\mathsf{Q}.\;\;\mathsf{But},\;\mathsf{Mr}$  Willows, you have told us this is what you were using to record your relevant facts, your 16 decision-making, instead of your daybook, but the information you should have been putting in your daybook, it's not here, is it? A. It's not. It's not on that spreadsheet at that stage, no. 21 Q. Are you suggesting it was input at a later stage? 22 A. No, I don't know. 23 Q. Did you consider that information -- so, for example, the composition of the boat, how many people were

25 wearing life jackets, whether the boat was underway --

58

1 transcripts . 2 Q. Okav

2	Q.	Okay.
3		On that call at around 1.20 with HM Coastguard, it
4		doesn't seem like you are working through a sort of
5		structure or a list or a checklist of questions and
6		information to be obtained. Did you have any guidelines
7		for what information you should be seeking to obtain and
8		record?
9	Α.	Again, from the SOP, there would have been guidelines on
10		what information to ascertain.
11	Q.	Within the SOP that we looked at $$
12	Α.	I believe so.
13	Q.	—— previously?
14		Can we turn to {INQ000507/1}, please. This is the
15		$next\$ the covering email for the next Border Force
16		tracker live update being circulated and this one is
17		timed at 2.43, so we are about an hour and 20 minutes on
18		from that initial phone call we were just looking at.
19		If we turn to 508 {INQ000508/1}, please, we should
20		see the spreadsheet itself and at the top, timed at
21		2.50. We know it was actually sent before 2.50, but it
22		is sent hourly, I understand, so this is the 2.50, if
23		I can put it that way.
24	Α.	Mm.
25	Q.	And the entry for Charlie now says:

1		"Valiant attending. ETA 1 hr to location. Now
2		a Mayday."
3		Do you remember now who wrote that entry, whether it
4		was yourself or Ms Whitehouse?
5	Α.	I don't recall, no.
6	Q.	The entry mentions that Charlie was now a Mayday. Did
7		you hear the Mayday yourself?
8	Α.	No, because that would have been broadcast on VHF, which
9		we didn't have access to.
10	Q.	Do you remember now how you learnt that Charlie was
11		a Mayday?
12	Α.	From seeing the transcript of the phone call, I believe
13		I had seen reference to it on the coastguard tracker, so
14		I phoned the coastguard for an update and part of that
15		conversation was around the Mayday issue.
16	Q.	Could we turn, please, to the text of the Mayday itself,
17		which is at {INQ007660/1}. Very efficient indeed.
18		Timed at 2.27, so before the spreadsheet we have just
19		looked at.
20		If we turn to the next page {INQ007660/2}, we can
21		see the text of the Mayday Relay that was broadcast. In
22		the second paragraph, we can see that it says Charlie
23		is:
24		"Taking water and requiring immediate assistance."

Can you remember if that was something you were

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1 aware of at the time?

25

- A. So we wouldn't have heard this broadcast. This was 2 3 obviously on VHF, so we wouldn't hear those broadcasts 4 made by the coastguard and we weren't -- to my recollection , we weren't aware of the immediate 5 assistance that was required at that stage. That was 6 7 the coastguard carrying out their SOLAS responsibility, 8 making that broadcast. 9 Q. I think we can take this down now. Thank you. 10 You have got an asset which, according to the 11 tracker we have just looked at, is estimating about
- 12an hour to get to the location. We know, in fact, the13Valiant did take almost exactly one hour then to get to14the Sandettie region. This broadcast says immediate
- assistance is required.
   If you had heard that Mayday, if you had known that
   Charlie required immediate assistance at 2.27, do you
- 17 Charlie required immediate assistance at 2.27, do yo 18 think you might have reassessed whether your asset
- 19 provision, the decisions you had made about the assets 20 to send, were sufficient?
- A. So that -- ultimately, that is a coastguard decision to
  make. They were obviously aware of what assets we had
  available. They had asked for Valiant to be tasked. We
  had phone calls with them since the initial tasking. If
- 25  $% \left( {{\left( {{{\rm{T}}} \right)}} \right)$  they felt it was necessary for additional assets to be

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- 1 tasked, that would have been down to them to make that 2 request either for us to deploy another Border Force 3 asset or an RNLI asset. 4 Also, that -- them broadcasting that Mayday Relay, that goes to all ships in the Dover Straits. They all 5 have a legal responsibility to respond to that 6 7 broadcast. So if there were -- if there were any commercial ships in that vicinity , they would have been 8 9 legally obliged to respond as well and report to the 10 coastguard. 11 But as far as assets and taskings were concerned, if 12 they felt it necessary that another asset was required, 13 they would have made their request to us. They -- it's 14 happened previously when we have got one boat out, but 15 then they become aware there is multiple events and they 16 require additional resourcing, then they would make that 17 request, but the request wasn't made that night. 18 Q. Mr Willows, you were a trained mariner. I appreciate 19 some time before this, but you had the training. You 20 knew about SOLAS obligations. 21 A. (Nods). 22  $\mathsf{Q}.\;$  And in this situation , you have a boat requiring 23 immediate assistance and an asset that isn't going to be 24 there for another hour. 25 A. Mm-hm. 63
- 1  $\mathsf{Q}.\;$  My question to you was: if you had known that, would you 2 have reassessed the situation and the need to provide 3 further assets? I am asking about you and what you 4 would have done. A. No, not necessarily. Valiant was en route, yes, from 5 6 a Border Force perspective and it was going to take her 7 an hour. To deploy another asset, it would probably 8 take them two hours to get there. So a Border Force 9 asset. another -- an additional Border Force asset 10 wouldn't have got there any quicker than Valiant was 11 going to get there. 12 That's why they -- that's why I am saying that's why 13 I assumed they made the Mayday Relay broadcast because 14 they were trying to see if there were any other assets 15 closer to the scene than Valiant was, with the 16 expectation that they would have responded themselves. 17 Q. Okay. Let's turn to the next call, please. About 18 20 minutes after the tracker we were just looking at was 19 circulated, you took part in a call with HM Coastguard. Can I take you to {INQ007602/1}, please. This is the 2.0 21 transcript of a call between vourself and someone called 2.2 Neal Gibson at 3.11 on 24 November 2021. If we turn to 23 the second page, please {INQ007602/2} 24 Mr Willows, looking at this now, are you able to say 25 whether in fact this was you on the call?

1	Α.	Yes, I believe I have heard this recording, so yes, that
2		was me.
3	Q.	It looks like here you are making the call to
4		HM Coastguard. They say:
5		" good evening"
6		You say:
7		"[Yes] it 's Border Force Maritime Command
8		here."
9		They say:
10		" how can I help?"
11		So you have made this call. What made you pick up the phone and call coastguard?
12 13	٨	
14	А.	So I believe this is the phone call which refers to the
14		Mayday broadcast and I was enquiring as to what the situation was.
16	0	So if we look at the transcript , I think originally , you
17	ч.	were asking about two incidents called Bravo and India
18		and you say:
19		" just looking at your tracker, which we can
20		view "
21		So confirmation you can see the tracker:
22		" incidents Bravo and India, can you confirm if
23		they've both been picked up by the French and being
24		returned to France or what's the score with "
25		And Mr Gibson confirms that they are likely to be
		45
		65
1		
1 2		repeats of Incident Charlie. He says:
2		repeats of Incident Charlie. He says: " the numbers match up the story matches as
2 3		repeats of Incident Charlie. He says: " the numbers match up the story matches as well."
2 3 4		repeats of Incident Charlie. He says: " the numbers match up the story matches as well." And he tells you that you have had the same boat
2 3 4 5		repeats of Incident Charlie. He says: " the numbers match up the story matches as well." And he tells you that you have had the same boat calling regularly. Was that something that was unusual,
2 3 4 5 6	А.	repeats of Incident Charlie. He says: " the numbers match up the story matches as well." And he tells you that you have had the same boat calling regularly. Was that something that was unusual, to have one boat calling multiple times and have to work
2 3 4 5 6 7	А.	repeats of Incident Charlie. He says: " the numbers match up the story matches as well." And he tells you that you have had the same boat calling regularly. Was that something that was unusual, to have one boat calling multiple times and have to work out whether calls related to a single boat?
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2 3 4 5 6 7 8 9	A.	repeats of Incident Charlie. He says: " the numbers match up the story matches as well." And he tells you that you have had the same boat calling regularly. Was that something that was unusual, to have one boat calling multiple times and have to work out whether calls related to a single boat? No. My understanding is that would happen on a regular basis. You would get multiple people from the same
2 3 4 5 6 7 8 9 10	A.	repeats of Incident Charlie. He says: " the numbers match up the story matches as well." And he tells you that you have had the same boat calling regularly. Was that something that was unusual, to have one boat calling multiple times and have to work out whether calls related to a single boat? No. My understanding is that would happen on a regular basis. You would get multiple people from the same vessel making multiple phone calls, which made the
2 3 4 5 6 7 8 9 10 11 12 13	A.	repeats of Incident Charlie. He says: " the numbers match up the story matches as well." And he tells you that you have had the same boat calling regularly. Was that something that was unusual, to have one boat calling multiple times and have to work out whether calls related to a single boat? No. My understanding is that would happen on a regular basis. You would get multiple people from the same vessel making multiple phone calls, which made the coastguard's role, I think it's got to be said, incredibly difficult, so for them to try and differentiate between all events that were being
2 3 4 5 6 7 8 9 10 11 12 13 14	A.	<ul> <li>repeats of Incident Charlie. He says:</li> <li>" the numbers match up the story matches as well."</li> <li>And he tells you that you have had the same boat calling regularly. Was that something that was unusual, to have one boat calling multiple times and have to work out whether calls related to a single boat?</li> <li>No. My understanding is that would happen on a regular basis. You would get multiple people from the same vessel making multiple phone calls, which made the coastguard's role, I think it's got to be said, incredibly difficult, so for them to try and differentiate between all events that were being reported. But yes, no, it wasn't it wasn't unusual.</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15		<ul> <li>repeats of Incident Charlie. He says:</li> <li>" the numbers match up the story matches as well."</li> <li>And he tells you that you have had the same boat calling regularly. Was that something that was unusual, to have one boat calling multiple times and have to work out whether calls related to a single boat?</li> <li>No. My understanding is that would happen on a regular basis. You would get multiple people from the same vessel making multiple phone calls, which made the coastguard's role, I think it's got to be said, incredibly difficult, so for them to try and differentiate between all events that were being reported. But yes, no, it wasn't it wasn't unusual. That's what that's what happened on a regular basis.</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16		<ul> <li>repeats of Incident Charlie. He says:</li> <li>" the numbers match up the story matches as well."</li> <li>And he tells you that you have had the same boat calling regularly. Was that something that was unusual, to have one boat calling multiple times and have to work out whether calls related to a single boat?</li> <li>No. My understanding is that would happen on a regular basis. You would get multiple people from the same vessel making multiple phone calls, which made the coastguard's role, I think it's got to be said, incredibly difficult, so for them to try and differentiate between all events that were being reported. But yes, no, it wasn't it wasn't unusual. That's what that's what happened on a regular basis. And it wasn't part of your role to try and distinguish</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q.	<ul> <li>repeats of Incident Charlie. He says:</li> <li>" the numbers match up the story matches as well."</li> <li>And he tells you that you have had the same boat calling regularly. Was that something that was unusual, to have one boat calling multiple times and have to work out whether calls related to a single boat?</li> <li>No. My understanding is that would happen on a regular basis. You would get multiple people from the same vessel making multiple phone calls, which made the coastguard's role, I think it's got to be said, incredibly difficult, so for them to try and differentiate between all events that were being reported. But yes, no, it wasn't it wasn't unusual. That's what that's what happened on a regular basis. And it wasn't part of your role to try and distinguish which calls related to which incident?</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. A.	<ul> <li>repeats of Incident Charlie. He says:</li> <li>" the numbers match up the story matches as well."</li> <li>And he tells you that you have had the same boat calling regularly. Was that something that was unusual, to have one boat calling multiple times and have to work out whether calls related to a single boat?</li> <li>No. My understanding is that would happen on a regular basis. You would get multiple people from the same vessel making multiple phone calls, which made the coastguard's role, I think it's got to be said, incredibly difficult, so for them to try and differentiate between all events that were being reported. But yes, no, it wasn't it wasn't unusual. That's what that's what happened on a regular basis. And it wasn't part of your role to try and distinguish which calls related to which incident?</li> </ul>
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. A.	<ul> <li>repeats of Incident Charlie. He says:</li> <li>" the numbers match up the story matches as well."</li> <li>And he tells you that you have had the same boat calling regularly. Was that something that was unusual, to have one boat calling multiple times and have to work out whether calls related to a single boat?</li> <li>No. My understanding is that would happen on a regular basis. You would get multiple people from the same vessel making multiple phone calls, which made the coastguard's role, I think it's got to be said, incredibly difficult, so for them to try and differentiate between all events that were being reported. But yes, no, it wasn't it wasn't unusual. That's what that's what happened on a regular basis. And it wasn't part of your role to try and distinguish which calls related to which incident?</li> <li>Correct, no.</li> <li>Understood.</li> <li>If we can turn to the next page {INQ007602/3}, we</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21	Q. A.	<ul> <li>repeats of Incident Charlie. He says:</li> <li>" the numbers match up the story matches as well."</li> <li>And he tells you that you have had the same boat calling regularly. Was that something that was unusual, to have one boat calling multiple times and have to work out whether calls related to a single boat?</li> <li>No. My understanding is that would happen on a regular basis. You would get multiple people from the same vessel making multiple phone calls, which made the coastguard's role, I think it's got to be said, incredibly difficult, so for them to try and differentiate between all events that were being reported. But yes, no, it wasn't —— it wasn't unusual. That's what —— that's what happened on a regular basis. And it wasn't part of your role to try and distinguish which calls related to which incident?</li> <li>Correct, no.</li> <li>Understood.</li> <li>If we can turn to the next page {INQ007602/3}, we can see Mr Gibson says:</li> </ul>
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. A.	<ul> <li>repeats of Incident Charlie. He says:</li> <li>" the numbers match up the story matches as well."</li> <li>And he tells you that you have had the same boat calling regularly. Was that something that was unusual, to have one boat calling multiple times and have to work out whether calls related to a single boat?</li> <li>No. My understanding is that would happen on a regular basis. You would get multiple people from the same vessel making multiple phone calls, which made the coastguard's role, I think it's got to be said, incredibly difficult, so for them to try and differentiate between all events that were being reported. But yes, no, it wasn't it wasn't unusual. That's what that's what happened on a regular basis. And it wasn't part of your role to try and distinguish which calls related to which incident?</li> <li>Correct, no.</li> <li>Understood.</li> <li>If we can turn to the next page {INQ007602/3}, we can see Mr Gibson says:</li> </ul>
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2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. A.	<ul> <li>repeats of Incident Charlie. He says:</li> <li>" the numbers match up the story matches as well."</li> <li>And he tells you that you have had the same boat calling regularly. Was that something that was unusual, to have one boat calling multiple times and have to work out whether calls related to a single boat?</li> <li>No. My understanding is that would happen on a regular basis. You would get multiple people from the same vessel making multiple phone calls, which made the coastguard's role, I think it's got to be said, incredibly difficult, so for them to try and differentiate between all events that were being reported. But yes, no, it wasn't it wasn't unusual. That's what that's what happened on a regular basis. And it wasn't part of your role to try and distinguish which calls related to which incident?</li> <li>Correct, no.</li> <li>Understood.</li> <li>If we can turn to the next page {INQ007602/3}, we can see Mr Gibson says:</li> </ul>

1		"Is that still a Mayday situation at the moment or
2		not "
3		So at that stage, as you have indicated, you knew
4		that Charlie was a Mayday situation.
5	Α.	(Nods).
6	Q.	And he says:
7		" they've told me it's full of water."
8		Pausing there, was that new information to you at
9		that time? Can you remember?
10	Α.	I can't recall specifically . I don't know. I can't
11		remember.
12	Q.	In the Mayday broadcast, the Mayday Relay, there is
13		a reference to Charlie taking on water, but here, "full
14		of water" means something different, doesn't it?
15	Α.	If that was the $$ if that was the case, then yes.
16	Q.	Did you understand that to be different, taking on
17		water? The Inquiry has heard some evidence that it's
18		relatively common that boats take on some water. Here
19		you are being told Charlie is full of water.
20	Α.	Yes. Well, obviously we $$ we couldn't, you know, say
21		one way or another if that was the $$ if that was the
22		case. Yes, as you said, the boats, generally speaking,
23		yes, were very poor quality and, yes, they would
24		normally ship a lot of water. But yes, we couldn't
25		comment on this specific situation there.
		( <b>-</b>
		67
1	0	What do you mean when you say, "We couldn't tell one way
2		or the other if that was the case"? Here you are being
3		given information by HM Coastguard about the state of
4		the boat, aren't you?
5	A.	I believe they are reporting $$ well, they are advising
6		us to what they have been told by one of the people on
7		the boat.
8	Q.	Is that something you accept and used to inform your
9	-	response or is it something you are scentical of? You

- 9 response or is it something you are sceptical of? You
- 10 are questioning: is that really true?
- A. Well, primarily, it's down to the coastguard, yes, as
   part of their overall assessment of the incident and the
   situation. Obviously, if they felt that it was in real
- situation. Obviously, if they felt that it was in realdistress , then that's when and why they would broadcast
- 15 a Mayday and ask for assistance from any other vessels,
- 16 you know, close by.
- 17 Q. Setting aside the coastguard for a minute, I want to
- 18 understand what you thought when you got this
- 19 information, and I appreciate if you cannot remember,
- 20 please do say. There is no criticism for being unable
- 21 to remember. I want to understand what you can recall.
- 22 A. Right.

- 23  $\,$  Q. When you found out that Charlie was full of water, did  $\,$
- 24 that change your assessment of the urgency of the
  - situation, of this incident?

- 1 A. Well, from our point of view, Valiant was tasked and
- 2 Valiant was en route. There was nothing else, you know,
- 3 that we could have done at that stage. Like I say, it
- 4 was the -- the situation was overall managed by the
- 5 coastguard. So we had tasked and deployed our asset and
- she was on the way to the scene, so there wasn't -- you 6
- 7 know, there wasn't anything else that we could have done 8 at that stage.
- 9 Q. Once again, I am not asking what you wanted to do or 10 what you thought you should do. I am asking about your
- 11 assessment of the urgency in the situation. You find
- 12 out that we have got a boat now which is full of water.
- 13 Does that change your understanding of how urgent this
- 14 is; whether it is an emergency, whether there is people
- 15 in distress? I am talking about you and not the 16
- coastguard. I know you can't speak for another
- 17 organisation. What did you think? 18
- A. Well, I can't recall the night in question, so
- 19 I don't -- I don't recall, you know, the conversation
- 20 specifically, but, as I say, the Valiant was en route.
- 21 There was nothing else that we could have done at that
- 22 stage. We tasked our asset and they were on their way 23 to the scene.
- 24 Q. Looking back at the transcript, Mr Gibson says:
- 25 "... they've told me it's full of water. The reason

- I did the full Mayday broadcast was to get a certain 1
- vessel which is painted grey and there was a French flag 2 3 at the back of it to attend ... However, they've
- 4
- basically completely ignored a SOLAS Mayday distress 5 call ... "
- Again, you have just told us you knew there was 6
- 7 a Mayday Relay and, therefore, that other vessels were
- 8 going to attend. Here, you are finding out that, in
- 9 fact, that Mavday broadcast has been ignored. Did that 10 change your assessment of the situation?
- 11 A. Well, again, there's nothing we could do in response to 12 that. Issuing Mayday broadcasts like that was part of
- 13 the coastguard remit and it's not something that we -we got involved in. So no, there was nothing else we 14 15 could have done at that stage.
- 16 Q. Mr Willows, my question isn't what did you do or what 17 could you have done. My question is about your 18 assessment of the situation. What did you think about 19 the risk, the urgency of it, about Charlie and what 20 dangers Charlie might have been in? I want to 21 understand what was in your mind when you learnt that
- 2.2 the boat was full of water, you knew that the Valiant
- 23 was a considerable distance away and you knew now that
- 24 the Mayday Relay had been ignored. What did that make
- 25 you think about this incident?



1 A. Well, again, Valiant couldn't have gone any faster, so 2 there's nothing we could have done that would have got 3 our asset there any quicker. Like I say, that would 4 have been down to the coastguard to consider deploying a lifeboat if they could have got there quicker, but 5 that's not a decision for us to take. We had Valiant 6 7 tasked and that was our -- our remit. 8 Q. Mr Gibson goes on to say at the bottom of that paragraph: 9 10 " ... once the Valiant has dealt with Charlie, there could well be some other vessels ... in that area." 11 12 You say: 13 "Same area, yeah, okay, that's fine. Well, we'll 14 wait and see what the sort of numbers are and whether 15 Valiant can deal with that." 16 Then you say: 17 " ... we don't want to call any other assets out just 18 yet, but we'll wait and see what develops." And then Mr Gibson says: 19 2.0 "That's the dream, isn't it, don't get more than one out." 21 22 And if we turn to the next page {INQ007602/4}, right 23 at the top -- forgive me, I think there is more up at 24 the top, is there? Thank you. If we turn to the next 25 page, you are then being told about helicopter rescue.

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1 You have heard Mr Gibson say the dream is to get 2 one asset out. Was that your understanding at the time; 3 that there was -- the ideal was to only ever have 4 one asset responding? 5 A. So that statement is basically referring to resource 6 management. We obviously had limited assets working on 7 Op Deveran at that time and, obviously, they only had --8 they were restricted with how many hours they could 9 work, etc, how long they could go to sea for. So we 10 wouldn't want to send more than one asset to sea unless 11 we had to. Otherwise, you are wasting hours that 12 a vessel could be at sea when they weren't required. So 13 it was all about resource management at the end of the 14 dav 15 Q. Can we turn to your statement please, which is 16 {INQ010214/4} at paragraph 11, page 4. You are 17 explaining there your response in this call and you say: 18 "[HM Coastguard] did not ask me to task an asset 19 during the call; if they had done so then I could have 2.0 considered the request together with Karen as the higher 21 officer 2.2 But that's not quite what we have seen in this call, 23 is it? When Mr Gibson raised the fact that there were 2.4 other boats in the area, you say, "We don't want to call

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any other assets out just yet". So you are making

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1		a decision about whether or not you want to call assets	1		coastguard, as soon as they $$ if they had a different
2		out in response to additional boats in the area in the	2		or updated position from an earlier one, they would
3		course of that call.	3		obviously pass that to any assets which were en route.
4	Α.	No, I think if you read $$ if you listen to that	4	Q.	Looking then at the next section of the transcript ,
5		conversation and read that conversation, that was	5		Mr Gibson says:
6		a two-way conversation. He said there were potentially	6		" the Flamant has got $$ it was alongside one
7		other boats in the area; again, potentially, because	7		with 30 in it and there's another one with 40, so that
8		they had already identified duplicates during that night	8		would be potentially 110, worst-case scenario, which is
9		already, so they didn't know for definite if or how many	9		probably pushing our luck for Valiant."
10		other boats there were out there. So it's in that	10		You say:
11		situation where you wouldn't want to task vessels	11		"Oh yeah."
12		without knowing that there were definite other migrant	12		At this point, you are being told by HM Coastguard
13		vessels there.	13		that there are more persons in the area requiring rescue
14	Q.	Okay. Why don't we go back to the transcript Page 4	14		than the Valiant's maximum capacity. We know the
15		{INQ007602/4}? So if we carry on, Mr Gibson gives some	15		Valiant could take 100 and he is saying 110:
16		information about helicopter rescue, says:	16		" potentially 110 which is probably pushing
17		" 163 is going to come and help us with the	17		our luck for Valiant."
18		search."	18		And you agree. You say, "Yeah". Is that right?
19		And in your statement, you have said that you	19	Α.	So a couple of things there, then. So all numbers at
20		understood that the helicopter would be about 15 minutes	20		that stage are estimates. They are based on the initial
21		to reach the Sandettie area. In fact, if we look here,	21		reports of the incident, so it depends where that
22		Mr Gibson says the helicopter is lifting in 30 minutes.	22		information has come from. So basically, those figures
23		Did you understand that the helicopter was going to take	23		are not likely to be very accurate.
24		15 minutes to come?	24		Obviously, Valiant's capacity at that stage was 100.
25	Α.	I don't recall . I can't remember.	25		If the $$ the actual number of migrants might have only
		73			75
		73			75
1	Q.	73 Okay.	1		75 been 100 and even if it was 110, Valiant would
1 2	Q.		1 2		
	Q.	Okay.			been 100 and even if it was 110, Valiant would
2	Q.	Okay. If we carry on, page 4 of the transcript $$ it's	2		been 100 and even if it was 110, Valiant would potentially either manage to get that number $$ squeeze
2 3	Q.	Okay. If we carry on, page 4 of the transcript —— it's this page —— bottom of that first paragraph, Mr Gibson	2 3		been 100 and even if it was 110, Valiant would potentially either manage to get that number $$ squeeze that number on board anyway, or if there was more than
2 3 4	Q.	Okay. If we carry on, page 4 of the transcript $$ it's this page $$ bottom of that first paragraph, Mr Gibson says they have got a WhatsApp position for Charlie.	2 3 4		been 100 and even if it was 110, Valiant would potentially either manage to get that number $$ squeeze that number on board anyway, or if there was more than that, then the coastguard would need to request or
2 3 4 5		Okay. If we carry on, page 4 of the transcript it's this page bottom of that first paragraph, Mr Gibson says they have got a WhatsApp position for Charlie. Why didn't you ask for those co-ordinates at the	2 3 4 5	Q.	been 100 and even if it was 110, Valiant would potentially either manage to get that number — squeeze that number on board anyway, or if there was more than that, then the coastguard would need to request or deploy additional assets, whether it was Border Force or
2 3 4 5 6	A.	Okay. If we carry on, page 4 of the transcript it's this page bottom of that first paragraph, Mr Gibson says they have got a WhatsApp position for Charlie. Why didn't you ask for those co-ordinates at the time?	2 3 4 5 6	Q.	been 100 and even if it was 110, Valiant would potentially either manage to get that number — squeeze that number on board anyway, or if there was more than that, then the coastguard would need to request or deploy additional assets, whether it was Border Force or RNLI.
2 3 4 5 6 7	A.	Okay. If we carry on, page 4 of the transcript it's this page bottom of that first paragraph, Mr Gibson says they have got a WhatsApp position for Charlie. Why didn't you ask for those co-ordinates at the time? Sorry, where's this? What part?	2 3 4 5 6 7	Q.	been 100 and even if it was 110, Valiant would potentially either manage to get that number — squeeze that number on board anyway, or if there was more than that, then the coastguard would need to request or deploy additional assets, whether it was Border Force or RNLI. So in each of these instances, for the 30 and the 40 and
2 3 4 5 6 7 8	A. Q.	Okay. If we carry on, page 4 of the transcript it's this page bottom of that first paragraph, Mr Gibson says they have got a WhatsApp position for Charlie. Why didn't you ask for those co-ordinates at the time? Sorry, where's this? What part? So there is a first chunk from Neal Gibson,	2 3 4 5 6 7 8		been 100 and even if it was 110, Valiant would potentially either manage to get that number — squeeze that number on board anyway, or if there was more than that, then the coastguard would need to request or deploy additional assets, whether it was Border Force or RNLI. So in each of these instances, for the 30 and the 40 and the different boats being calculated, the number might
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1	Q.	And in that scenario, if it is correct or, in fact, if
2		it 's an underestimation, there are a number of people in
3		the Channel classed as being in distress and we don't
4		have sufficient assets to take them. That was the
5		position, wasn't it, Mr Willows?
6	Α.	That's potentially the case, but, again, that would be
7		down to the coastguard to make that assessment and
8		request additional assets. That wasn't our decision to
9		take. They were $$ they had all the information and it
10		would be their assessment and decision around what
11		assets were currently tasked. That phone conversation
12		didn't at any stage result in a request for additional
13		assets.
14	Q.	In this transcript, Mr Gibson says:
15		" [it's] probably pushing our luck for Valiant."
16		You say:
17		"Oh yeah."
18		And he says:
19		"Fingers crossed the French can't count."
20		And if we turn to the next page $\{INQ007602/5\}$ , you
21		say:
22		"Right, yes."
23		You were betting, banking, relying on the
24		possibility that this intel being provided to you was
25		wrong:

	"Fingers crossed the French can't count."
	Is that right?
Α.	As I said earlier , that whole issue is around resource
	management, so you wouldn't want to send any other
	assets out to sea unless you knew categorically that
	there were too many for Valiant to deal with initially .
	Otherwise, your $$ the knock $-$ on effect is going to be
	the next day when you know it is going to be busy during
	the daytime and you are not going to have enough assets
	for daytime. So until you knew there was a necessity
	for assets to be tasked, that's the way $$ that's the
	way it worked at the time. There were limited $$
	limited resources and you had to manage it one way or
	another.
Q.	Because if you are wrong and the French can count and
	there are 110 or more people in the Channel, there is
	no one available to take them, is there, because there
	is only one asset tasked with a max capacity of 100?
Α.	Yes, but like I say, that wasn't our assessment or
	decision to make.
Q.	You have told me that you were concerned that if you
	tasked an asset, there might not be enough for the next
	shift . Was the reason why you didn't say, "Hey,
	Neal Gibson, why don't you consider tasking another
	asset if there is more than the Valiant can take"
	Q. A.

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1		because you believed there were insufficient assets to
2		cover the two periods?
3	Α.	Well, it wasn't our role to offer assets. The
4		coastguard knew what assets were available. They were,
5		in $% \left( {{{\mathbf{r}}_{{\mathbf{r}}}}_{{\mathbf{r}}}} \right)$ of the events, so
6		it was their decision. It was down to them to assess
7		and make the decision as to whether or not there were
8		enough assets tasked or not.
9	Q.	But you have just told us you had a concern about
10		whether there would then be sufficient assets for the
11		following day, and your role and the role of
12		Karen Whitehouse is the management of Border Force
13		assets; isn't that right?
14	Α.	That's correct.
15	Q.	So did you have a concern that there would be
16		insufficient assets to meet the demand?
17	Α.	That concern was always there.
18	Q.	Okay.
19		At this stage, why didn't you have a discussion with
20		Karen Whitehouse about this? We can see all of this
21		happens in the course of a call . Why didn't you turn to
22		the person you have said was your line manager, more
23		senior than you, and say, "Look, they are saying there's
24		110. We know that it could be inaccurate. It could be
25		more, could be less. Should we task another asset?
		79
1		Should we say to coastguard, 'Is this enough?'"
2	Α.	Well, we would have had that discussion when I came off
3		the phone no doubt and, as I have said, it was down to
4		the coastguard to make that request in the first place.
F	0	Dut we have that a second sector to the test second INA/s

5 Q. But we have just seen you saying to the coastguard, "We 6 don't want to call any other assets out just yet". Why 7 would they ask if you have said, "We don't want to do 8 that"?

9 A. And the coastguard were in agreement with that statement

10 during that conversation. They were fully aware of the

11 resource available as well, so it was -- it was what it

12 was. There were only finite resources available and until you knew you needed for definite more assets, you 13

wouldn't send them out. 14

15  $\mathsf{Q}.\;\;\mathsf{Mr}$  Gibson then goes on to go through the different boats

16 that are in the Sandettie area in this transcript. He

17 uses the French numbering system. We can see he talks

18 about, down at the bottom:

- "  $\ldots~$  10 and 11 are pretty much slap bang on the 19 20 Sandettie." 21
  - So 10 and 11 he says are in UK waters and then
- 22 pretty much slap bang on the Sandettie. He talks about
- 23 3 in the middle. He says 3 is:
- 24 "  $\ldots$  south of Valiant, in the same sort of place as 25 Charlie ... "

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migrants."

spreadsheet?

contact numbers.

Q. Okay.

1	And we know that 7 is Charlie.
2	If we turn to the next page, page 6 $\{INQ007602/6\}$ ,
3	we can see "Uh huh" at the top, and then you say:
4	"Yeah, they're certainly all in the same
5	vicinity "
6	So from this, at this stage, you have been talked
7	through one by one. 10, 11, 3 and 7 are all in the
8	Sandettie area; is that right?
9	A. Yes.
10	Q. That's important information to know for determining
11	what assets might need to respond; would you agree?
12	A. Yes.
13	Q. Where did you record that information, Mr Willows?
14	A. I can't recall categorically. That information would
15	presumably have on the coastguard tracker at that stage.
16	Q. I am asking about your recording, Mr Willows, not the
17	coastguard's recording.
18	A. Okay. Well, whether it's on our live update or not,
19	I can't recall.
20	Q. Did you tell Karen Whitehouse that were those four boats
21	all in the Sandettie area, the area that the Valiant was
22	going to?
23	A. We would have discussed what the telephone conversation
24	was about when I came off the phone, so yes, we would
25	have both been aware of what the situation was.
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-	
1	Q. Again, you are saying "would have". Do you remember now
2	whether you did?
3	A. I don't recall night in question, no.
4	MS WOODS: Sir, we are coming up to the hour mark, but
5	I only have, I think, probably 10 minutes left.
	I wonder if it is worth pushing through, if you are
7	amenable.
8	SIR ROSS CRANSTON: Yes, I think so. Let's get it finished,

- 8 SIR ROSS CRANSTON: Yes, I think so. Let's get it finished,
- 9 yes.
- 10 MS WOODS: Thank you very much.
- 11 I want to understand about the recording of this
- information from this call. It is quite a considerable
   chunk of information we have just been through piece by
   piece.
   Could we turn to the next live update, which is
- 15 Could we turn to the next live update, which is
- \$\left[NQ0005440/1\]\$. That's the covering letter again,
   covering email, from Karen Whitehouse at 3.50, and if we
- $18 \qquad \mbox{turn to INQ000451, the spreadsheet itself{INQ000541/1}.}$
- 19 Now, looking at this, we can see that some changes
- $20\,$  were made to this tracker, the Border Force tracker, as
- 21  $\hfill a result of that call because we can see that Bravo and$
- 22 India have been marked as duplicates. It says,
- 23 "Duplicate of C", can you see, under B and I?
- 24 A. Yes.
- 25~ Q. Is that something that was input by you or
  - 82

1		Karen Whitehouse? Can you say either way?
2	Α.	I can't say for definite , but if Karen was sending the
3		live updates, then I assume Karen had updated the live
4		update.
5	Q.	But if we look at the row for Charlie at this time,
6		there have been no changes. There is no text in red and
7		the "Brief Description" section is exactly the same as
8		it was before that 3.11 call .
9	Α.	Mm-hm.
10	Q.	It doesn't say Charlie is full of water. It doesn't say
11		there are potentially 110 people in the Sandettie area
12		needing rescue, and it doesn't say no other vessels are
13		responding to the Mayday Relay or the Mayday Relay has
14		been ignored by the vessel it was directed to.
15		Why wasn't this written down, Mr Whitehouse $$
16		Mr Willows? Apologies.
17	Α.	Well, as I say, it's $$ it reflects that Charlie was
18		a Mayday at that stage. Valiant would have been passed
19		directly by the coastguard the locations of any $$ of
20		any other incidents, so they would have been aware
21		direct from the coastguard what other incidents were
22		potentially out there apart from Charlie. And, yes,
23		apart from that, I can't $$ you know, can't comment on
24		anything else there.
25	Q.	Could we go to INQ000572 {INQ000572/1}, please. I think
		83
1		this is the next live update Border Force tracker.
2		I think we can skip the covering email and go straight
3		to the document itself.
4		This is timed at 4.50 at the top, we can see, and
5		there has now been new information added to the box for
6		Charlie. It says:

"Vessel found and Valiant embarked a number of

A. Well, again, if Karen sent the email, then I would

Do you remember now how the boat that was

A. Well, we wouldn't make the -- we wouldn't ascertain

intercepted by Valiant was identified as Charlie? Where

which vessel was which on (inaudible). That was where,

as I said earlier , the coastguard would ask the crews

for details of numbers on board. If they had telephone

numbers, that's when they would start cross-referencing

Yes, that wasn't our remit, to ascertain which was

which. Like I say, on some shifts, there would be, as

there was here, multiple reports of boats and multiple

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assume that Karen had updated the tracker.

did this information come from?

Again, can you help us with who wrote that into the

1 boats actually interdicted [sic], but it wasn't our role

- 2 to ascertain which was which.
- 3~ Q. Just to confirm, do you remember now where that
- information came from, whether it was from the tracker or from another source?
- 6 A. No. Presumably the coastguard tracker was updated to
- reflect it in some way, so we would have been, one wayor another, told by the coastguard that Charlie had been
- 9 intercepted.

March 13, 2025

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- 10 Q. And we can see that an M or Mike number has been added
- 11 into the spreadsheet for Charlie. It's been given the 12 number M957. Can you help us with who assigns
- L2 number 10957. Ca
- 13 an M number?
- A. So it is the MCC role. That's the reference number for
   our case register , just a sequential number for the next
   hoat that's interdicted
- 17 Q. But would that be yourself or Karen Whitehouse?
- 18  $\,$  A. So whoever was running the case register. So if Karen
- was running the logs that night, Karen would have issuedthe M number.
- 21 Q. Is that what the role of an MCC select officer is?
- 22 There is an entry on the case register --I don't think
- 23 we need to go to it -- that says that you were the MCC
- 24 select officer for M957. Is that that role?
  - A. Yes, I can't recall where it says "select", but yes,

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- $1 \qquad \mbox{there would be a drop-down option and, yes, MCC}$
- 2 obviously would be one of the drop-down options.
- 3 Q. Okay

25

- 4 We know that over the course of the early hours of
- 5 the 24th that Valiant intercepted a total of
- $7\,$  a different part of the Channel. We have heard on the
- 8 call at 3.11 that you had been told that there were
- 9 four boats, 10, 11, 3 and 7, in the area requiring
- 10 rescue
- 11 Why was Valiant allowed to return to port with only 12 three of those four intercepted?
- 13 A. Well, again, that's a coastguard decision. Once
- 14 they've -- yes, when they can return to port, that's not
- an MCC decision. That's a combination of if they have
- 16 reached their -- their limit for number of migrants on
- board or the assessment that there's no outstanding
- 18 vessels. But that's not an MCC decision.
- 19
   Q. So you have been told there are four out there and you

   20
   know at that point that Valiant has found three. Are
- 21 you saying it's not your role or responsibility to say,
- 22 "Hang on, I think we might have missed a boat here"?
- 23 A. Well, I don't know if it was -- maybe the coastguard
- 24 thought there was another duplicate. They had already
- 25 identified duplicates from earlier in the evening, so
  - 86

- 1 maybe they had decided that four was in fact three.
- 2 I don't know. I can't comment on that, but that's one 3 possible scenario.
- 4 Q. I want to ask you about the end of your shift. Do you
  - remember giving a handover to the next shift that night?
- A. Standard procedure is for a substantial lengthy handover
   between shifts.
- 8 Q. Mr Willows, do you remember giving a handover that 9 night?
- 10 A. I don't recall the night, so no.
- 11 Q. It therefore follows that you can't help us with what
- 12 information was or wasn't shared with whoever was coming
- 13 in for the next shift.
- 14 A. Not categorically, no.
- 15 Q. And you don't have any written records of what was said
- 16 or shared on the handover.
- 17 A. No, no

5

- 18  $\,$  Q. We know that there was information that was shared with
- 19 you on various calls through the night that was never
- 20 input into the tracker or the spreadsheets and that you
- 21 weren't using your daybook. Can you tell us now, given
- 22 that information wasn't recorded in writing, whether or
- 23 not that was shared with the next shift?
- A. All -- all relevant information would have been shared
   with the oncoming shift.

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- Q. But you can't say for certain because you don't
- 2 remember.

1

- 3 A. No, but as standard procedure, that would have been the 4 case.
- 5 Q. Mr Willows, is it right you weren't on shift the
- 6 following day when the recovery operation took place?
- 7 A. I was back on duty that night.
- 8 Q. Back on duty the night of the 24th?
- 9 A. Correct.
- 10 Q. But not during the day of the 24th?
- 11 A. No. I had just finished the night shift.
- 12 Q. When did you first realise that Charlie, the mass
- 13 casualty situation which happened during the day on the
- 14 24th, was the same boat that had -- you had been dealing
- 15 with on your shift on the night of the 23rd/morning of
- 16 the 24th?
- 17 A. I don't recall when we sort of became aware of --
- 18 obviously I was aware that day of the incident, what had
- 19 happened, but I don't recall when I was -- when I became
- aware, you know, which event it related to.
- 21  $\,$  MS WOODS: Thank you, Mr Willows. I don't have any further  $\,$
- 22 questions.
- 23 Thank you, chair.
- 24 SIR ROSS CRANSTON: Thanks very much, Mr Willows. Thanks
- 25 for your evidence. I am grateful.

1	We shall have a short break, but can we continue	
2	with Mr Downs? Yes, okay. Fine, let us do that.	
3	(The witness withdrew)	
4	(12.09 pm)	
5	(A short break)	
6	(12.20 pm)	
7	MR STUART DOWNS (affirmed)	
8	SIR ROSS CRANSTON: Good afternoon, Mr Downs.	
9	A. Afternoon.	
10	SIR ROSS CRANSTON: Ms Moffatt has got some questions for	
11	you. If you could just read the affirmation first .	
12	Questions by MS MOFFATT	
13	MS MOFFATT: Can you please state your full name?	
14	A. Yes, Stuart Martin Downs.	
15	Q. And you have made a witness statement dated	
16	1 December 2024 which runs to 35 pages; correct?	
17	A. That's correct.	
18	Q. And in November 2021, you were employed by His Majesty's	-
19	Coastguard; correct?	-
20	A. Yes. Her Majesty's Coastguard then, but yes.	-
21	Q. At the time, correct.	
22	A. HMCG.	
23	Q. And you joined HMCG, HM Coastguard, on 15 March 2021 as	
24	a trainee MOO or maritime operations officer. A. That's correct.	
25	A. That's correct.	
	89	
1	Q. And you left HM Coastguard's employment on 13 June 2022.	
2	A. Yes.	
3	Q. So starting with your role, you have told the Inquiry	
4	you completed the standard MOO training package in	
5	October 2021.	
6	A. (Nods).	
7	Q.~If~I could just put your statement on the screen, so	
8	this is Inquiry number {INQ010208/2}, paragraph 6. You	
9	list there the formal courses completed in parts by	
10	a trainee MOO.	
11	A. That's correct, yes.	
12	$Q.\;$ Is that what you meant by the standard training package?	
13	A. It is, yes.	
14	$Q.\;$ In November 2021, you were in a team that was led by the	

- Q. In November 2021, you were in a team that was led by th
   search and rescue mission co-ordinator or SMC,
   Neal Gibson.
- 17 A. That's correct.
- 18 Q. That was team 3.
- 19 A. Yes, that's correct.
- 20 Q. And Mr Gibson has described the qualifications status of
- $21 \hfill those in his team in his statement, so perhaps let's put$
- 22 that on the screen now, please, {INQ010392/24},
- 23 paragraph 55. So paragraph 55, please.
- 24 \$\$ So let's look at that paragraph. Starting on the <math display="inline">\$
- 25 second line, he says:

1		"My SAR team that night consisted of [you ], a $MOO-T$
2		and [the trainee] who was also a MOO $-T$ "
3		So MOO $-T$ is the trainee $$
4	Α.	Yes, there's only ever one MOO $-T.\ Though it says MOO-T$
5		and then the abbreviation in full , it's actually just
6		the one maritime operations officer training.
7	Q.	I will just get to that in a minute. Let me just $$
8	Α.	Oh, right.
9	Q.	I will just read a bit more. So he says:
10		"One MOO was on annual leave, and another MOO was
11		off_sick."
12		So you were a bit short-staffed:
13		"At the time, Stuart [you] was partially qualified ,
14		holding a Communications ticket, which met the minimum
15		requirement for staff counting. However, he had not yet
16		completed his Incident Response qualification, the final
17		step to becoming fully certified ."
18		And then it goes on to talk about the trainee, who
19		was a full trainee.
20		So he is essentially comparing the full trainee,
21		which was the person who had only been with coastguard
22		for 30 days, I think, at the time, and you had the
23		communications qualification, but not the incident
24		response qualification .
25	Α.	That's correct

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- 1 Q. Is that right?
- 2 A. That's correct. I understand that I completed that in
- 3 February 2022, so three months afterwards, after this 4 event.
- 5  $\,$  Q. And was there anything that a -- I don't know if it's
- $\ensuremath{\mathsf{6}}$  right to call someone without that qualification
- 7 a trainee MOO or a MOO, but is there anyone -- anything
- 9 qualification could not do as a result?
- 10~ A. I don't think formally. Structurally, the -- once
- 12 had the comms ticket, then you could -- were able to do
- 13  $\,$  or be engaged in all activity , but I still wasn't  $\,$
- 14 qualified in mission co-ordination or any of that sort
- 15 of format. I believe that came with the incident
- 16 response part, which was February 2022.
- 17~ Q. So is that a way of saying that there were a few things
- 18 that you couldn't do, but you could answer calls,
- 19 999 calls, because you had the communications ticket?
- 20 A. Yes, basically act as an assistant for the SMC, yes.
- 21 Q. But would agree that you weren't fully qualified at --
- 22 A. Yes, I hadn't done that course by then.
- 23 Q. And just to confirm then, we saw in your statement,
- 24 paragraph 6, that you confirmed that those were the core
- 25 modules. Would incident response be additional to that?

- 1 A. Additional -- incident response was in addition to --2 once I started on the programme, the courses I listed
- 2 once I started on the programme, the courses I listed 3 were the ones that I was advised were core ones and
- 3 were the ones that I was advised were core ones and 4 incident response was added as an additional one. When
- incident response was added as an additional one. When it was decided to add that on for all MOOs, whether it
- 5 it was decided to add that on for all MOOs, whether it 6 it 's -- exactly what date that was decided, when that
- 7 was instigated, I don't know, but when I started on the
- 8 programme, the ones listed were the ones to be qualified
- 9 and then they added in the incident response section.
- 10 When they did that, I don't know.
- 11~ Q. So you became fully qualified in February 2022,
- 12 I believe -
- 13 A. That's correct
- Q. -- and undertook the incident response qualification.
   And as someone who was partially qualified, did you
- 16 receive any extra support from HM Coastguard?
- 17 A. In what way, sorry?
- 18  $\,$  Q. Well, from extra supervision or any other type of
- 19 support.
- A. No, it all went through the SMC, so the SMC was thelinchpin to the whole (inaudible).
- Q. And in terms of the physical layout of the operationsroom in Dover, where were you sitting in relation to
- 24 Neal Gibson and the trainee?
- 25  $\,$  A. Neal would be roughly sat on the side of the room, about

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- $1 \qquad \ \ \, \mbox{where you are now, and then the trainee MOO was sat to}$
- $2 \qquad \text{my} --$  to my left, where I would to be left now, and
- 3 I was sat to their -- next side, so --
- 4 Q. Further up the room?
- A. Further up the room. So yes, Neal was desk-wise almost
  as far from -- so -- because there was only three desks
  on that side, so Neal, the trainee MOO and then myself
- 8 in a similar distance that you have got here.
- 9 Q. And how would you and the others in the team communicate10 and share information whilst you were working?
- A. Primarily -- if it was busy, then primarily it would be
   via ViSION, but also trying to overhear what was going
   on with what other people were doing, what other
- 11
   activity there was.
   So via ViSION, but trying to talk
- 15 to each other in person in the room.
- 16 Q. I want to now turn to your experience and training17 regarding small boats in November 2021. You have
- 18 already told us that you started in March 2021.
- 19 A. Yes.
- Q. So between November and March of that area, had you
   previously worked shifts that were with significant
   small boat activity?
- 23 A. Yes.
- 23 A. fe
- Q. And in general terms, insofar as it 's possible to say,
   how common an occurrence was it between March and
  - 94

2 boats? 3 A. I would say it was fairly common. 4 Q. And in terms of how you learned about responding to small boats, let's look at your statement again. So 5 010208, paragraph 9, please {INQ010208/3}. You say 6 7 there paragraph 9, first line, no formal training for responding to small boat incidents and, second line, you 8 9 said that you were told this was the case because small 10 boat crossings were a relatively new phenomenon; 11 correct? 12 A. That's correct. 13 Q. Just for completeness, do you recall attending 14 a presentation at Dover in summer or autumn 2021 about 15 small boat search and rescue? 16 A No I do not 17 Q. You go on in your statement to explain how you did learn 18 about search and rescue for small boats. So

November 2021 to have a heavy shift in terms of small

- 19 paragraph 10, as we can still see on the screen, and
- 20 paragraph 11, you say that you can't recall any Standard
- 21 Operating Procedures specific to small boat search and
- 22 rescue, but you say you would have read them on the
- 23 coastguard information portal, if they were there.
- 24 And the coastguard information portal was
- an intranet; is that right?

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- 3 A. Oh, yes, that's correct.
- 4~ Q. And other than the intranet, the coastguard information
- 5 portal, was there any other way in which information or 6 guidance about small boats was shared or cascaded at
- 6 guidance about small boats was shared or cascaded at7 Dover?
- 8 A. Verbally or vicariously through experience.
- 9~ Q. Through experience. Let's get on to that.
- 10If we could just go to 13, bottom of the page, you11say that Neal Gibson gave you an overview about small
- boat work in your first week and, second line, you say: "The approach to these incidents was based on what people had picked up on the iob and the practice had
- 14 people had picked up on the job and the practice had 15 evolved from there."
- 16 So would it be fair to say that insofar as your
- 17 experience goes, the coastguard's approach to small boat
- $18 \qquad$  work was primarily learned and taught on the job by
- 19 those doing the operational work at Dover?
- 20 A. Yes, that's correct.
- 21  $\,$  Q. And would it be fair to say as well that the practices
- 22 developed as people had learned and things had --
- experience had been gained in the ops room at Dover?
   A That's correct The way things occurred was evolving
- A. That's correct. The way things occurred was evolving.Q. In terms of communicating with those on board small
  - ${\sf Q}. \$  In terms of communicating with those on board small

- 1 boats, the Inquiry has heard from several of its
- 2 witnesses about the difficulties in communicating with
- 3 those on board, including language difficulties ,
- 4 difficulties relating to patchy mobile phone signal,
- 5 calls cutting out. 6 In terms of the la
  - In terms of the language barrier, how often, if at
- 7 all, did you use interpretation services?
- 8 A. Not at all.
- 9 Q. And why was that?
- 10~ A. I wasn't aware that it was available and also, actually,
- 11 there generally wasn't -- on the phone call, the calls
- 12 quite often cut out. There wasn't time to actually --
- 13 of trying to work out what language. Also, the person
- 14 that called generally understood enough English to get 15 some information from but there wasn't -- there wasn'
- 15 some information from, but there wasn't -- there wasn't 16 generally time on the call to get more information,
- 17 because the phones cut out quite often.
- 20 A. Yes.
- 21 Q. -- make sense.
- 22 A. Yes.
- 23  $\,$  Q. Insofar as you can answer this, did you know if others
- 24 in Dover were aware of coastguard's interpretation
- 25 services?

- 1 A. I don't know.
- 2 Q. In terms of difficulties around patchy mobile signal and 3 calls cutting out, how common a problem was this?
- 4 A. It was very common.
- Q. Had you received any guidance from HM Coastguard about
   how to mitigate the problems associated with calls
   dropping out?
- 8 A. To try to encourage the caller to dial 999, because that
- 9 sometimes gave us a position of where the boat was using10 the 999 system. So that was the guidance in relation to
- 11 this particularly
- 12 Q. Where did that guidance come from?
- 13 A. That, again, was the same. It was shared, as far as
- 14 I know, around -- verbally around the control room.
- 15 Q. So, again, it was people learning --
- 16 A. Learning by experience.
- 17~ Q. Learning by experience and then passing it on to
- 18 trainees?
- 19 A. Yes.
- 20 Q. And just so we are clear, dialling 999, why would that 21 assist?
- 22 A. Dialling 999, the computer system is set up -- a very
- 23 good system. It would try to -- using where the mobile
- 24 phone signal was pinging the respective mobile phone
- 25 telephone masts, the computer would try to work out

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- 1 where the position was. So, for example, we used that 2 to find a gentleman that was lost, thought he was on the 3 White Cliffs, but was actually in the middle of 4 Leicestershire. He had Alzheimer's. But when he called 5 from the 999 system, we were able to find out instead of being on dark cliffs , he was actually in a rugby field 6 7 in Leicestershire and was able to speak to Leicester 8 Constabulary, who went to assist him. 9 So we tried to use the same technology if someone's 10 stuck on the cliffs or on the shore. The closer you are 11 to the coast, the more accurate it is. But that was one 12 chance to try to get a geolocation for somebody: that 13 you could utilise the systems. They didn't rely on them 14 knowing where. They -- as I say, this gentleman thought 15 he was on the cliffs , but he was in Leicestershire . So 16 that's how -- that's why that was useful 17 Q. You have mentioned that it would be more accurate the 18 closer you were to land. 19 A. That's correct. 20  ${\sf Q}.\;$  Obviously, these -- the people on board the small boats 21 that were calling you were actually in the middle of the 22 sea and sometimes around the median line. 23 Sometimes, but they would get as close to the -- to the Α. 24 port of Dover. Below the White Cliffs would actually 25 make a beach landing. So it -- at that time, people 99 1 would regularly make it across to the shore in the UK as 2 well, so it was a -- sometimes they were quite close to 3 the coast, sometimes quite a distance. 4 Q. If they were close to the coast, it might work. Close
  - to the median line, were you aware of any limitationsaround calling 99?
  - A. The further away you were, the less well it would work,
     but that was -- without that, then you had nothing. At
     least it was an option
- 9 least it was an option.10 Q. And would you, for example, prioritise getting certain
- 11 bits of information? If you were aware a call was going
- 12 to cut off, would you prioritise getting -- I don't
- 13 know -- name, phone number, passing the coastguard
- 14 mobile phone? How did that work did?
- 15 A. Yes
- 16 Q. You have an order of priority?
- 17 A. Yes, generally, tried to find out if they called before,
- 18 so you knew how many boats you were looking for. Tried
- 19 to find out where they had set off from, where -- what
- 20 time that was so you could try and work out where they
- 21 had perhaps got to, knowing what time they set off, how
- 22  $\,$  fast  $\,--$  roughly how fast they were going. As I say, the
- 23 colour of the boat, if they could see anything else
- around them, because we try and triangulate from them,
- 25  $\,$  if they could see another vessel . Some -- some merchant

- 1 vessels, like MSC, the company, for example, it has
- 2 "MSC" painted in large letters down the side. If they
- 3 could see another large ship and see some writing on it,
- 4 you could then find the large ship and then work out in
- 5 relation to them where they were, so ...
- Q. Was that an order of priority? Because given me lots ofthings that you would want to find out that is the SOPs,
- 8 for example, but did, in your head, you think, "Well,
- 9 I need to get this in order to -- a phone number, for
- 10 example, to make sure that I can call this person back 11 afterwards" or ...
- 12 A. Yes, guite -- if there was to be a phone number, it
- 12 A. Tes, quite -- in there was to be a phone number, it
   13 would appear on the screen. The large one was actually
   14 to try and get the -- initially the name so that you
- 15 knew which incident that you were dealing with.
- 16 Otherwise, we are going to divert resources looking for
- 17 boats that didn't exist . If you're looking for -- if
- $18\,$  five people from the same boat had called, you're now
- 19 looking for five boats instead of looking for one, so
- 20 you're perhaps diverting resources away from being able
- 21 to conduct an effective rescue because you are looking
- for boats that don't exist.
  Q. So name was important --
- 23 Q. So name was important -24 A So name --
- 5 Q. -- location --

- A. -- (overspeaking) the boat, the location, yes, the
   colour of the boat, distance times. So sometimes, it
   varied from call to call in that it depended what the
- 4 person was offering you. So if they were offering you
- 5 certain information to start with, you would go with
- 6 that as opposed to interrupting them and saying, "Well,
- 7 I'll come to that later". No, if they offered you
- 8 some -- a description, for example, of the number of
- 9 occupants, etc, that might come early on. That's
- 10 another way of trying to identify the vessel. So if
- $11 \qquad \mbox{they offered it first}$  , so some would be tailored
- 12 towards –
- 13 Q. It would be responsive to --
- 14 A. Responsive to the caller, yes.
- 15 Q. -- what the caller was also saying.
- 16 A. So ...
- 17~ Q. So you and others at HM Coastguard have told the Inquiry
- 18 that callers from small boats exaggerated their level of
- 19 distress .
- 20 A. That's correct.
- $21 \quad {\sf Q}. \ \ {\sf That's \ right, \ isn't \ it?}$
- And was this something that you and colleagues atDover ever discussed?
- 24~ A. It  $\,--$  yes, it probably did come up in conversation quite
- a bit because some of the things which were said, for

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- 1 example I do remember raising one. A gentleman called 2 me and said a lady was unconscious at the bottom of the 3 boat, she was in the water. So I asked him, "Take her out of the water so she's not lying in the boat. Why is 4 she unconscious?" "She's broken her arm." "Well, how 5 can she be unconscious if she's broken her arm?" 6 "I don't know. I'll ask her." "So she's not 7 8 unconscious then." 9 So just in that one phone call that stood out 10 because obviously she wasn't unconscious. But then 11 other times there would be reports of lots of activity 12 going on in the boat and when the rescue vessel got 13 there it wasn't the case. 14 Q. If you could just look at paragraph 132 of your 15 statement. We'll just wait for that to come up on the 16 screen {INQ010208/31}. 17 So second line of 132, you say you learnt how to 18 deal with the content of calls from small boats. The 19 third line; that about a week into starting your shift, 2.0 you were advised what callers would say. So that was 21 about March 2021. 22 A. Yes, that's correct. 23 Q. Yes. And who told you what callers would say? 24 Neal Gibson was the team leader that briefed us on this, Α 25 but then others corroborated that. 103
  - 1  $\mathsf{Q}.\;$  And what were you told about what callers would say? 2 A. That it would generally be overstated that the boat --3 the boat was sinking, people were drowning, the make-up 4 of the people on the boat, the state of people, that 5 people were giving birth or -- at the time on the boat, 6 etc. So that it would be overly -- whatever was going 7 on would be overstated. 8 Q. You were told to expect exaggeration? 9 A. Yes. And also there would be some -- some of the calls 10 would be abusive to you and blaming you for not actually 11 coming to get people, although you didn't necessarily 12 know where they were. But to be -- in order to generate 13 a response, but there was going to be a response anyway because you are in a small boat in the Channel, but to 14 15 be aware that you would be called sometimes abusive --16 you would receive abusive calls sometimes, but also that 17 what was going on was probably being overstated. 18 Q. Did that influence how then you responded to calls if 19 you were told that they might be abusive and would be 2.0 exaggerated? 21 Obviously it made it more difficult to deal with the Α 2.2 abusive side because you are trying to get the 23 information. So that was, could be frustrating because 2.4 you are trying to get information to bring the aid to
  - 25 them, but you would still try to find out information so

1		resources could be vecting in by the SMC to actually
2		effect the rescue.
3		So did it $$ did it stop you doing the activity in
4		relation to actually being practically doing it? No.
5		It wasn't necessary, it didn't need to be abusive. Just
6		phone me up and say, "We are in a dinghy, in a boat, in
7		the Channel" and being co-operative would have $$ would
8		have made it easier to have found the information.
9		But did it stop us trying to deal with the rescue?
10		No, it didn't.
11	Q.	If we look at 127 of your statement you say that in your
12		experience the majority of callers from small boats
13		exaggerated their level of distress . When you say
14		"majority", are you saying insofar as that's possible to
15		say, are we talking more just over half or are we
16		talking nine out of ten for example?
17	Α.	Nine out of ten.
18	Q.	You also refer to leaflets given to those up in small
19		boats with pictures to explain what to say and who to
20		call . What was the context in which you saw those
21		leaflets ?
22	Α.	Sorry, how do you mean context?
23	Q.	So who had them? Was it coastguard that had them? How
24		did you get those leaflets ?
25	Α.	Oh, no, the criminal financial investigation from $$
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- 1 side took photographs because when the boats were
- 2 recovered they would take the photographs or the cutter
- 3 crews may or the CTV crews might get that. Where the
- 4 origin of the particular leaflets came from I don't know
- 5 other than it was part of when the vessels were
- recovered that the information was gathered then. 6
- 7 Q. Did coastguard hold copies of these leaflets?
- 8 A. I saw it electronically, so I would take it that it was 9 held by -- I don't know who owned the electronic version of -
- 10
- 11 Q. But it was emailed to you?
- 12 A. -- obviously it was a photograph, it was a photograph of 13 a leaflet How I came how I came to see it whether it
- 14 was e-mailed to me or shown to me. I can't recall that.
- 15 Q. You don't know if it was emailed to you?
- 16 A. No, I don't know.
- Q. And how did you know, you have said they had pictures on 17
- 18 them telling people to exaggerate, but how did you know
- 19 those pictures were telling people to exaggerate? I am
- 2.0 finding it difficult to understand what picture could
- 21 show that
- 2.2 A. It showed sort of the journey, if you like, from sort of 23 getting in the boat and then a picture of, like, the
- 24 White Cliffs, which would be referred to in the phone
- 25 calls as white mountains, and then with a picture with

1 a boat through it, shows if it was sinking and with the image "999" and a picture of the phone, and then 2 3 a helicopter, I think. I can't remember all the 4 pictures, but it was, if you looked at it, the picture was sort of when you -- and it showed the Channel with 5 the -- from recollection it showed the Channel with the 6 7 median and then basically and then another image once 8 you are beyond that, that's when to make the calls. 9 I can't remember all the pictures, but that was the 10 general gist of it. So it was pictorial. It didn't 11 matter what language the person with it spoke. The 12 image portraved that. 13 Q. To me, from what you have just described, it doesn't 14 sound to me like that would necessarily mean it was 15 telling them to exaggerate. For example if they had a 16 boat sinking and a 999, could it not also mean if your 17 boat is sinking then you should call 999? A. It could. 18 Q. Yes. Did you personally agree with HM Coastguard's 19 20 policy that all small boats, due to factors such as 21 their inherent unseaworthiness, overcrowding, should be 22 classified as in distress? 23 A. It wasn't really my position to make a view -- take 24 a view on that. They were dealt with as if -- as they 25 were in distress.

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- 1  $\mathsf{Q}.\;$  And how do you think that the belief that you and others 2 held about exaggeration, nine times out of ten from 3 small boats, impacted on how calls from them might be 4 dealt with and assessed? A. They were dealt with -- dealt with in line with the 5
- 6 normal search and rescue process. In fact, as I just 7 mentioned the fact that somebody's in a boat in the Channel would still bring a response. 8
- 9 Q. Was anything that was said to you -- so if a boat.
- 10 a caller on board said, "I was sinking", would that be 11 treated at face value?
- 12 A. Yes. As far as I am aware, we'd still send the
- 13 resources to go and deal with it. 14
- Q. You say in your statement that it was fairly impossible 15 for the call taker to work out whether a small boat was
- 16 actually in imminent danger or not. So despite this,
- 17 were you supposed, nonetheless, to record everything
- 18 that was said at face value?
- 19 A. Yes. Yes.
- 20 Q. Let's move on now and talk about staffing and resources
- 21 at Dover. The Inquiry has heard evidence about staff
- 2.2 shortages in Dover in 2021.
- 23 A. Yes
- 24 Q. Are you aware of that?
- 25 A. Oh, yes. Yes.

1	Q.	And how, if at all, were you affected by the staff
2		shortages and resource problems?
3	Α.	In relation to the $$
4	Q.	In relation to maybe altered shift patterns, being asked
5		to do overtime. I think you changed your team, you went
6		because of staff shortages, as I understand it?
7	Α.	Sorry, I was going to say in relation to dealing with
8		incidents, then, yes, it was perhaps less people, less
9		experienced people $$ there were less more experienced
10		people to learn from to see that.
11		So as a MOO, when I was a MOO trainee, before
12		completing all the courses, you would still be actively
13		involved in incidents.
14		In relation to actual cover then yes, I was moved
15		from one team to another to cover gaps because the
16		retention rate was so poor. $\ensuremath{I}$ was moved to try and
17		cover some gaps in a particular team.
18	Q.	Did you ever feel overwhelmed?
19	Α.	Oh, yes. Yes. Yes, we were.
20	Q.	Let's look at your statement again, paragraph 43, please
21		{INQ010208/9}. So third line right at the bottom. You
22		say it was concerning that the systems at MRCC Dover had
23		not really adapted to deal with it, it being the

- 23 not really adapted to deal with it, it being the
- 24 increase in small boats and the combination of that and 25 the staff shortage.

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1		Can you explain what you mean by the systems at
2		Dover not having adapted to deal with the volume?
3	Α.	I think because the vessel $$ incidents were dealt with
4		as standard incidents, those standard incidents were
5		geared towards dealing with perhaps two tankers
6		colliding in the Channel, where you knew where the
7		incident was, they were going to be reporting. So
8		something that was more in line with JESIP, joint
9		emergency services interoperability principles , and the
10		joint decision model, something more aligned to that,
11		that could cope with multiple incidents of an unknown
12		number, an unknown location would be $$ that's an
13		adaptation that ${\sf I}$ would have thought would be developed.
14	Q.	So you thought the system itself perhaps couldn't handle
15		this new type of search and rescue?
16	Α.	That's correct.
17	Q.	You say later in your statement that you did raise some
18		concerns regarding work practices, but you don't think
19		your observations were well received. Why do you say
20		that?
21	Α.	Well, maritime operations officer is an administrative
22		officer in the civil service structure, so very junior
23		and so their observations were $\mbox{ I just}$ $\mbox{ they were}$
24		sort of maybe noted, but not moved on, so

25  $\,$  Q. I see. So you felt that the junior level of your role

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1		meant what perhaps you weren't best placed to be making
2		these types of observations $$
3	Α.	That's correct.
4	Q.	—— or raising concerns?
5	Α.	That's correct.
6	Q.	You also say there was high turnover of personnel and
7		the staff retention problem at Dover at 2021. Insofar
8		as you are able to say, do you know why this was the
9		case?
10	Α.	Quite often it gets brought up around the pay and the
11		conditions and that other people $$ people move because
12		other agencies can pay more. But then also I think the
13		working structure, the culture, etc. So there's a host
14		of reasons.
15		Also it's quite a $$ it's a very junior position,
16		perhaps quite a lot of responsibility so people maybe
17		move on to do other things. People seem to stay about
18		a year is the average. Some people stayed a lot longer,
19		but
20	Q.	And when you refer to the working conditions and
21		culture, what does that refer to? The volume of work,
22		the
23	Α.	The volume of the work, the whole $$ the whole package,
24		the whole experience for want of a better expression of
25		the way it's structured in relation to managing the

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	incidents, the training programmes, etc.
Q.	Was this something that was specific to Dover in your
	view? I mean, perhaps you are not able to answer but
	was this the case for all MOOs across the coastguard
	network?
Α.	I haven't worked at other locations and I would take it
	that the other locations didn't really have the small
	boat volume, so it would have affected them less. Also
	perhaps some are more geographically remote so whereas
	Dover is obviously in the southeast, it's got lots of
	opportunities for work elsewhere, whereas perhaps
	Stornoway for example is more remote, perhaps less
	opportunities to move to other locations.
Q.	And then you say paragraph 47 {INQ010208/10}:
	"The staffing levels and what organisationally
	H.M. Coastguard was comfortable with surprised [you]."
	And then you refer to routine remote cover, which we
	will come on to.
	So essentially, and I think you might have told me
	this already, is it fair to say that in your view
	coastguard didn't have adequate systems in November 2021
	to deal with both the surge in number of small boat
	crossings and the staff shortage at Dover?
Α.	Yes.
Q.	Let's move on to remote cover. We can stay on
	A. Q.

- 1 paragraph 47. The second line you talk there about zone
- 2 flexing . By zone flexing you mean coastguard's practice
- $3 \qquad \ \ \,$  of the remote involvement of one MRCC or the JRCC in the
- 4 work of another?
- 5 A. That's correct, except that zone flexing can either be
- 6 2009 zone picked up and managed from a completely an
- 7 entire zone was picked up and managed from a completely
- 8 different location or included support from another
- 9 location. So people --
- 10 Q. Yes.
- 11~ A. -- could either be geographically at the same place,
- 12 picking up an entire zone or geographically at two
- $13 \qquad \mbox{ different places.}$  So the two are quite different .
- 14 Q. So it's two different things and both things happened on15 the night in question because when initially you had
- 16 your break and Neal Gibson went and covered VTS, Vessel
- 17 Traffic Service, the whole, all the work at Dover moved
- 18 to the JRCC and then when Neal Gibson came back, remote
- 19 SMC cover ended -- sorry, then when you came back from
- 20 your break it was remote SMC and then when he came back
- 21 from VTS, then essentially SMC went back to him but the
- 22 JRCC remained involved. So there were various parts of
- 23 network flexing in Dover on the night in question?
- A. That's correct.
- 25~ Q. You refer to Humber in paragraph 37 and you say that

- 1 they were involved on numerous occasions.
- 2 A. Yes, that's correct.
- Q. Was this also the case with the JRCC, that you were usedto them being involved?
- A. Yes. Humber and JRCC were the ones we linked with most,
  sometimes other stations, but generally Humber and JRCC.
  Humber is in the same division, so we tend to have more
  links with them.
- 9 Q. How frequently was it that another MRCC or the JRCC were10 remotely involved with Dover's work in 2021?
- A. It seemed to be fairly normal. I couldn't tell you what
   percentage it was but it -- doing that, on days when
   that occurred that didn't surprise me.
- 14 Q. Did you receive any training or guidance on any
- adaptations that should be implemented when there wasa remote SMC or when you were working with another MRCC?
- 17 A. No.
- 18 Q. Moving on to paragraph 49 {INQ010208/11}, you say first
- 19 line, that whilst there were comments from others about
- 20 short staffing , any concerns about this were, in vour
- 21 words, covered off with remote support via the zone
- 22 flexing.
- 23 When you say "others", do you mean other staff at
- 24 Dover? So the paragraph --
- 25~ A. Yes, yes, I believe so. Yes.

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- 1 Q. -- starts:
- 2 "Others did comment ..."
- 3 A. Yes, I believe so.
- 4 Q. Yes. And then you refer to it, the answer being it
- would be "covered off" using your words in the statementwith remote support.
- 7 How effective a solution in your view was zone
- 8 flexing or remote support?
- 9 A. If there's the entire zone moved to a completely
- $10 \qquad \qquad {\rm different \ geographical \ location \ it \ was \ self-contained,}$
- 11 then that wasn't an issue. It was as if that, the
- $12 \qquad {\rm own} \; -- \; {\rm home \; station, \; if \; you \; like, \; was \; managing \; its \; own \; }$
- 13 patch because everybody's in one room and could
- 14 communicate.
- 15 When it was split it was difficult for example if
- 16 the SMC or another element such as channel 16 was on
- $17\,$  location and you were somewhere else. Then that made it
- 18 more it made it more complicated because also you 19 couldn't hear what was going on, you couldn't get the
- couldn't hear what was going on, you couldn't get thesituational awareness of what was happening. So when
- they were there and trying to assist it actually made it
- 22 more difficult because the -- the better one was where
- 23 the entire zone was picked up and moved as opposed to
- 24 a mismatch -- part being in one location and part being
- 25 in another.

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- $1 \quad \mbox{Q}. \ \mbox{So you could miss things by not being physically present}$ 
  - in the operations room?
- 3 A. That's correct.

2

- 4 Q. When you say it actually made it more difficult, can you5 explain that?
- ${\rm 6}$   $\,$  A. Well, because you didn't have that shared situational
- 7 awareness, so the --- it made it certainly more difficult 8 as well as for operators, also for the SMC because you
- as well as for operators, also for the SMC because you
   couldn't actually perhaps overhear parts of the
- 9 couldn't actually perhaps overhear parts of the
- 10 conversation, direct people, see where people were
- 11 struggling. It was more difficult to do it and it added
- in another -- perhaps on a busy night it added another
   link in the -- another communication to be done and then
- 14 trying to brief that person to then come back again.
- 15 Whereas if when it was done all in one geographic
- 16 location they would probably be aware of what you were
- 17 about to brief them and could understand what was
- 18 happening and so it just added another leg.
- 19 Q. It took more resource?
- 20 A. It took more resource to actually make the zone flexing
- 21 part work. When it was perhaps there to assist,
- 22 sometimes it actually made it more complicated.
- 23 Q. It hindered sometimes. Moving again to paragraph 52 of 24 your statement you explain how when you were a trainee
- 24 your statement, you explain how when you were a trainee
  25 you dealt with an incident involving a fatality with
  - you dealt with an incident involving a fatality with

1 2		help only from another trainee. Was this a small boat incident?	1 2		That's correct, yes.
∠ 3	۸	No, it wasn't.	3	Q.	And if a tactical cor oversee or do a RAG
4		And you say you had the assistance only of another	4		do that without it be
4 5	Q.	trainee also on duty at Dover. Was there no remote $$	4	۸	They would be able t
6	۸	There was remote, but actually at Dover just the two of	6	A.	could see which asset
7	A.		7		assets were doing.
8	0	us. I see. Finally on resources at Dover, let's look at	8		would be able to see
9	Q.	what you say at paragraph 53, the first line. You say	9	0	You also say line 5 t
10		in your view staffing shortages did affect Dover's	10	Q.	calls, monitoring VF
11			10		rather than focusing
12		ability to respond to small boat activity and then you	12		
13		refer, at line 2, to not necessarily being able to	12	۸	happen often in your
14		follow all the relevant processes. You give an example	13		Yes. It was quite an
15		of mission statements, the plans of action on how to respond to an incident being recorded after the event	14	Q.	Then you say in line volume was so great
16		because of the volume of calls.	15		0
			10		HM Coastguard operation
17		Was this the main example of where the standard			could not cope with t
18		operating procedures could these could not be followed	18		incoming.
19		due to volume of calls or?	19		It's quite strong
20	А.	I think, yes. It was quite common for mission	20		your view, was remot
21		statements and thing to be done a bit later because	21		JRCC able to mitigat
22		everybody knew what the reactions you know, which	22		To a certain extent,
23		resources had been sent. But actually physically typing	23	Q.	Then you say third li
24		in the mission statement when you have active 999 calls,	24		same paragraph:
25		communications to be done, if there weren't enough $$	25		"We became acci
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1		without enough people to actually do that task the	1		we could not action t
2		process would be clunky. So you didn't necessarily have	2		optimal because the i
3		the time to do that part. You still would assign the	3		[it]."
4		resources, but the way it was documented $$	4		So would it be fa
5	Q.	Where would the main $$ how would that impact? Would it	5		Dover became accust
6		be mostly problematic if it was someone remotely trying	6		HM Coastguard's Sta
7		to understand what was going on, or would it affect	7		the combination of ve
8		people in the operations room physically present as	8		lack of resource or s
9		well?	9	Α.	Yes. We tried to foll
10	Α.	It wouldn't affect it that much in that $$ so, for	10		but some of the perh
11		example, if a cutter or a lifeboat was assigned to	11		the mission statemen
12		an incident the tasking for that would be recorded, so	12		would still assign th
13		it would be recorded into that asset's entry so you	13		that was going on.
14		could see that a lifeboat, or whatever, had been tasked.	14	MS	S MOFFATT: Sir, I do
15		But the actual almost double-keying of listing it	15		I turn on to the nigh
16		again in a mission statement would take place was	16	SI	R ROSS CRANSTON:
17		later	17		and we will come bac
18	Q.	The mission statement would be the thinking, the	18		Thanks very much.
19		rationale, the planning?	19	(12	2.56 pm)
20	Α.	It's largely identifying what each resource was then	20		(Th
21		going to do in that incident, but that could be captured	21	(1.	.54 pm)
22		elsewhere as a free text option.	22	SI	R ROSS CRANSTON:
23	Q.	So are you saying that you weren't following standard	23	MS	S MOFFATT: I am go
24		procedures, but it wasn't having a material effect on	24		the night in question
25		prosecuting the mission?	25		cycle back to a coup
		110			

nd if a tactical commander, for example was trying to versee or do a RAG review, would they then be able to o that without it being recorded? hey would be able to see which assets -- because you ould see which assets were being assigned and what the ssets were doing. So if you looked at the incident you ould be able to see that. 'ou also say line 5 that the SMC would be answering alls , monitoring VHF because of the volume of work ather than focusing on the role of the SMC. Did that appen often in your experience? es. It was quite an impossible position for the SMC. hen you say in line 7 that  $\{INQ010208/12\}$  the call olume was so great that it almost paralysed the M Coastguard operating structure, as that structure ould not cope with the volume of information that was coming. It's quite strong language "almost paralysed". In our view, was remote support from other MRCCs or the RCC able to mitigate what you have just described? o a certain extent, but not fully. hen you say third line from the bottom, still on the ame paragraph: "We became accustomed to this, but it did mean that 119

1	we could not action things as perhaps would have been
2	optimal because the resources were not there to do
3	[it]."
4	So would it be fair to say that you and others at
5	Dover became accustomed to not being able to follow all
6	HM Coastguard's Standard Operating Procedures because of
7	the combination of volume of the crossings and also the
8	lack of resource or staff at Dover?
9	A. Yes. We tried to follow the process as best as possible
10	but some of the perhaps tidying up, by putting things in
11	the mission statement, that might come later but you
12	would still assign the assets and deal with the incident
13	that was going on.
14	MS MOFFATT: Sir, I don't know if now is a good time before
15	I turn on to the night in question.
16	SIR ROSS CRANSTON: It probably is. We will have a break
17	and we will come back just before 2 o'clock, five to 2.
18	Thanks very much.
19	(12.56 pm)
20	(The lunch break)
21	(1.54 pm)
22	SIR ROSS CRANSTON: Yes, Ms Moffatt.
23	MS MOFFATT: I am going to turn imminently to the events of
24	the night in question. Before I do, I just want to

25 cycle back to a couple of things we talked about before

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- 1 lunch.
- 2 The first is in terms of what you have told me about
- 3 feeling overwhelmed sometimes whilst working at Dover,
- 4 in the context of the staffing shortage and the volume
- 5 of small boat crossings, how often did this happen?
- 6 A. I couldn't -- it would be difficult to give
- 7 a percentage, but it wasn't uncommon that the
- 8 (inaudible) until news of what occurred many days later
- 9 broke. It didn't seem particularly different to normal.
- 10 Q. And did you do anything about it?
- 11 A. In -- in what regard?
- 12  $\,$  Q. Did you raise it with anyone? Did you say to
- 13 Neal Gibson or someone above him, "I am feeling
- overwhelmed on a relatively regular basis", for example?A. Oh, yes, the processes were (inaudible) and also, that
- 16 it was -- yes, we were overwhelmed at times and the
- 17resourcing levels , as I said in the statement, weren't18really adequate to deal with -- the system and resources
- 19 weren't adequate to deal.
- 20
   Q. And then when I asked you about concerns that you had

   21
   raised, you said your role was very junior and so you
- 22 weren't likely to be listened to.
- 23 A. Yes.

- 24  $\,$  Q. Just going back a step, how did you raise your concerns?
  - A. Verbally with the team leader, or if we had visitors, as

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- 1 in visiting .
- 2 Q. Visiting?
- 3 A. Within -- seniors within the coastguard.
- 4 Q. Senior management?
- 5 A. Yes. If we had the opportunity to speak, then we would.
- 6 Q. And what response did you get, if any?
- 7 A. That they were aware of the staffing shortages. There
- 8 was going to be a recruitment programme. They were9 coming up with plans. That's the way it was. Small
- 10 boats was an emerging thing. In maritime terms, as
- 11 I said in the statement, it was -- in their opinion, it
- 12 was, you know, a young phenomena.
- 13 Q. Let's turn now to the night in question. So
- 14 23/24 November on that night shift, the operational team
- 15 at Dover consisted of you and Neal Gibson. That's the
- 16 operational, because obviously we know there was
- 17 a trainee who was non-operational at that time.
- 18 A. Yes.
- 19 Q. You were supervised by Neal Gibson.
- 20 A. That's correct.
- 21 Q. In your statement, you said your role as a MOO was
- 22 essentially information gathering, as you understand it.
- 23 You would capture information to enable the SMC,
- 24 Neal Gibson, to review it and make decisions.
- 25 A. Yes, to act as his assistant, basically.

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- 1  $\,$  Q. Yes, and it would -- when you say information would be
- 2 captured, would that be in ViSION in the tracker?
- 3 A. That's correct, yes.
- $4 \qquad {\sf Q}. \ \ {\sf Those were the two written documents}.$
- 5 And the Inquiry has heard some evidence that it was
- $\boldsymbol{6}$  difficult , due again to the volume of small boats, to
- $7 \qquad \qquad {\rm keep} \mbox{ ViSION} \mbox{ completely updated as to what was happening.}$
- 8 Was that something that you could recognise?
- 9 A. Yes, that probably connects to the comments about, for
- 10 example, mission statements, trying to keep that part of 11 the process up to date, yes.
- 12 Q. So things would be added late.
- 13 A. Oh, yes, it wasn't uncommon to see mission statements
- being added just before an incident was closed becauseit had already been dealt with.
- Q. In addition to things being added late, would sometimes
   things not get added at all, or was that not something
- 18 that you recognise?
- A. I don't know on the individual cases. As far as myself
   would be concerned, if I was aware of it, it would be
- 21 entered.
- 22 Q. And in terms of how the work on each shift was divided 23 up. in your statement you have said that each shift
- 24 would split 1.5 hour slots and that you would do
- a different task in each hour and a half, essentially ,

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- 1 so answering routine calls for hour and a half, 2 monitoring VHF for hour and a half. Is that right? 3 A. Yes, they'd be an hour and an half slots. You may end 4 up being on routines for three hours, but they were 5 divided into an hour and a half building blocks, if you 6 like 7 Q. So that kind of leads to my next question, which is: on 8 the night in question, from what I understand, it 9 appears that you're answering calls all night. You 10 weren't monitoring VHF because that had gone to the 11 JRCC; is that right? 12 A. That's correct. 13 Q. Was it unusual that you would be doing the same task all 14 night or was that something that you'd become accustomed 15 to? 16 A. I'd become accustomed to it. 17 Q. And there was the full trainee present, as we have
- 18 discussed, and Neal Gibson has told the Inquiry that
- 19 that person had been with coastguard with only 30 days
- 20 at the time. Is that your recollection also?
- 21  $\,$  A. I don't know the number of days, but yes, a month or
- 22 more.
- 23  $\,$   $\,$  Q. And you say in your statement that the trainee operated  $\,$
- 24 the WhatsApp account --
- 25 A. Yes

- 1 Q. -- on the coastguard's iPhone or mobile phone since she
  - was not able to answer the 999 calls, not having
- 3 a communications ticket, as you have referred to it, and
- 4 that was a logical division of labour.
- Who allocated that role to her? 5
- A. I can't remember. I can't remember who allocated it 6
- 7 specifically . It was probably the SMC, but I couldn't
- say for certain. But apart from the 999 calls and 8
- 9 listening to VHF, then the MOO trainees in
- 10 apprenticeship sort of learned by doing, were actively 11 involved in things.
- 12 Q. Could it have been you that allocated the role to her or
- 13 was that not something that a MOO would be able to do? A. I wouldn't be able to allocate it to her. I could 14
- 15 encourage her to -- perhaps to do it. Whether -- who 16 specifically assigned it I don't know, but I wasn't
- 17 there to task her, but to support her in sort of -- in 18 the sort of coaching or mentoring.
- 19 Q. It was the SMC that would do the allocation of roles?
- A. Allocation of duties was SMC, yes. 20
- 21 Q. And did she or you receive any training on how to use
- 22 the mobile phone that you are aware of?
- 23 A. No.
- 24 Q. Did you yourself monitor or operate the mobile phone
- 25 that night?

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- 1 A. No. I don't believe that I did.
- 2 Q. And during the shift, were you aware of the mobile phone 3 ringing perhaps in the background?
- 4 A. I don't really -- I can't recall it . I can't recall
- 5 hearing it ringing, no. 6
- Q. In your statement, you say you had been briefed not to 7 answer any calls to the mobile phone.
- A. That's correct. 8
- 9 Q. And who briefed you not to answer the phone, the mobile 10 phone?
- 11 A. I can't remember specifically who it was, but that was 12 the operating procedure because it was there only to get
- 13 WhatsApp messages, because they were insistent that
- 14 calls went through the ICS system and the mobile phone 15 didn't, so don't answer it because it's not getting
- 16 recorded.
- 17 Q. So that's what you understood to be the standard
- 18 procedure.
- 19 A. That's correct.
- 20 Q. The mobile phone should not be answered.
- 21 A Correct
- 2.2 Q. And the trainee also made a call to French coastguard at
- 23 1.06 on the night.
- 24 A Yes
- 25 Q. We will look at it later, but do you know who asked her

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- 1 to call Gris-Nez, the French coastguard? 2 A. Not for certain, but it may have been me because, as 3 I say, the process was to learn by doing, so making 4 an outgoing phone call to get some information from the 5 French would be a normal part, because she wasn't precluded from doing that. That was -- that was -- the 6 7 training process was to learn by doing, like 8 an apprenticeship. 9  $\mathsf{Q}.\;$  So, as you said, you thought she was permitted to do 10 this. That was your understanding. 11 A. Yes. The only thing she wasn't permitted to do was 12 999 calls and VHF. 13 Q. So you didn't recognise her role as being one of 14 essentially observing someone who had been in the coastguard for --15 A. No, having been a MOO trainee myself until only a couple 16 17 of weeks -- a few weeks before, then no, the MOO trainee
- 18 was actively involved what was going on. It was learn
- 19 by doing. So, as I say, the only things that she's
- 2.0 precluded from was that, because when I was in the same
- 21 position, we also undertook activities --
- 22  $\mathsf{Q}.\;$  You were doing the same?
- 23 A. Yes. exactly.
- 24 So fair to say that it was normal, in your experience, Q
- 25 for a trainee MOO to make calls to MRCC Gris-Nez, the

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- 1 French coastguard? 2 A. Yes, it -- yes. 3 Q. And you have said in your statement that the trainee was 4 answering routine calls because there was no one else to 5 take them, and you also say that there were multiple 6 calls going unanswered due to demand out stripping 7 capacity. 8 A. Yes. 9 What about remote support from the JRCC? How did that Q. 10 fit in? Did they —-11 A. Well, they 12 Q. Sorry, go ahead. 13 A. Sorry, yes, as I say, the SA could answer calls which 14 were unanswered, because if somebody logged in at 15 another location as Dover, then the phones for Dover 16 would ring for them also --Q. So, sorry, if Dover couldn't answer, the JRCC would definitely pick it up? Is that how it worked? A. Not definitely pick it up, but if somebody was logged in
- 17
- 18 19
- 2.0 anywhere in the network as Dover, then it -- their phone
- 21 should ring as if they were physically at Dover. They'd
- 2.2 also interact on the phone and answer, as I say, as
- 23 Dover Coastguard. So it should do that, but obviously,
- 24 if there were more calls coming in, then that could
- 25 occur. Then they perhaps wouldn't. But also, the

1

- 1 999 calls should trip over -- should be a spillover, but
- 2 that didn't always work, so sometimes the excess
- 3 999 calls would go to another location, but didn't
- 4 always work.
- 5 Q. And the calls going unanswered, are you talking about
- 999 calls, calls from Dover port, coastguard mobile 6 7 phone?
- A. I can't recall specifically , but if there was multiple 8 9  $999\,$  calls , then you would have run out of people to
- 10 answer them
- 11 Q. And in terms of communicating with your colleagues on
- 12 the night, how would those of you in the operations room
- 13 at Dover communicate? Was there time to speak between 14 calls? Would you update each other?
- 15 A. It varied as the night progressed, but where opportunity 16 was, then you would try to communicate. But it wasn't 17 always possible, no.
- 18 Q. In terms of communicating with those at the JRCC, who 19 had maintained involvement in Dover's work, how did that 20 work?
- 21 A. There was an iPad which we had set up so that it was --
- kept an open call between JRCC and Dover. 2.2
- Q. Is that TalkBox? 23
- 24 A. No, that's a separate --
- 25 Q. That's a separate thing.

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- 1 A. -- separate thing. There was the TalkBox or the iComm 2 system, so it would be via the TalkBox, the iComm system 3 or the standalone iPad.
- 4 One of the calls I did take from Tom Barnett for
- 5 Neal was -- came through via the iPad.
- Q. So it was a direct way -- a direct line, essentially, 6 7 between ---
- 8 A. Yes, trying to sort of keep -- as best you could, 9 an open -
- 10 Q. An open line?
- 11
- A. An open line to them, yes. 12
- Q. How often were you in contact with Tom Barnett, let's say, from JRCC? 13
- 14 A. I can't recall the number of times I spoke to him.
- 15 Q. And in terms of your situational awareness on the night. 16 were you aware that the planned fixed wings surveillance 17 flight didn't happen?
- 18 A. I was aware there was an issue with the aircraft, yes.
- 19 Q. And you also didn't receive the French tracker until
- 20 slightly before 1.00 am, whereas information on it
- 21 showed that the French had already been aware of some
- 2.2 boat activity since the evening, 9.00 pm.
- 23 A. Yes
- 24 Q. The Inquiry has seen evidence that delay from the French
- 25 in sending a tracker was a common or relatively common

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A. Yes, they seemed to send it a little bit later than 2 3 you -- than perhaps might have been preferred. Not 4 always, but quite often it was the case 5 Q. And in your statement, you say that the relationship with French coastguard was reactive rather than 6 7 proactive and if you saw, for example, a French Government vessel in French waters, you might call 8 9  $\mathsf{Gris}\mathsf{-}\mathsf{Nez}$  to ask them if something was going on. 10 A Yes 11  ${\sf Q}. \ \mbox{You didn't call French coastguard earlier in the shift}$ 12 on 23 November. Do you know why you wouldn't have done 13 that? A. Contact with them to do that would be directed by the 14 15 SMC. I wasn't asked to do that and there wasn't any, 16 say, indicators that there was small boat activity going 17 on, as far as I can recall. 18 Q. And in your experience, had you got the tracker earlier. 19 would Border Force surface assets likely have been 20 tasked before any small boats got to the median line? 21 A. They may have been made aware, question -- no, we would 22 inform Border Force MCC and then they would have made 23 a decision at what time to stand the crew up, because 24 the crew obviously cover a two-week period, so they 25 don't want to raise them too soon because otherwise, you 131

occurrence in 2021. Were you aware of that?

1		are using their hours. So they may not have mobilised
2		them any sooner, but may have got a heads-up. But they
3		wouldn't be going to the median line to sit there and
4		wait, no.
5	Q.	Let's now turn to talk about the calls that Dover
6		started receiving on the night. So the first call from
7		a small boat was just before half past midnight. You
8		took it and it was Incident Alpha that you opened as
9		a result. This was a call that cut off before it could
10		be transferred to you, but the operator gave you
11		a number. And then when you called it back, it was not
12		a UK ringtone and the incident was downgraded from
13		distress as a result of there not being a UK ringtone.
14		Was that on the basis that it was considered to be
15		in French waters because of the $$
16	Α.	Yes, if it was in French waters, it'd be monitoring.
17	Q.	But it was the ringtone that made you think it was in
18		French waters?
19	Α.	Yes. There was nothing else to go on.
20	Q.	What was your understanding of the accuracy of
21		a ringtone to determine whether a small boat was in
22		French or UK waters?
23	Α.	That it would $$ it would be lined up with the
24		territorial boundary.
25	Q.	Were you aware that it may not always be a reliable

1		indicator of whether you had crossed the median line or	1	A.	Yes, that she had got from the Frer
2		not?	2	Q.	So it would be right to say that at
3	Α.	No.	3		night at around 1.20, you understoo
4	Q.	1.06, the Dover Coastguard was first made aware of	4		Charlie was in good condition based
5		Incident Charlie, and this is a phone call that we have	5		understood the French to have told
6		already spoken about between the trainee and MRCC	6	Α.	Yes.
7		Gris—Nez, French coastguard. The trainee said when she	7	Q.	After this, we know that Dover rec
8		was interviewed by HM Coastguard for its internal review	8		from those on board Incident Charlie
9		that she wrote down the notes of what she was told on	9		a call at 1.48 of around 20 minute
10		this call on a piece of paper and you entered the	10		the SMC, and the 16-year-old boy
11		information on ViSION and created the incident.	11		possibly known to you as "Moomin'
12		Is that your recollection or does that sound likely	12		Dover to be on board Incident Char
13		to you?	13	Α.	I was aware that he was $$ subset
14	Α.	I got the information that I put into ViSION from her,	14	Q.	That's a subsequent call $$
15		so that sounds likely, yes. I don't recall the	15	Α.	aware that he was talking to so
16		specifics of how it was done, but that's where I got the	16		Whether that's
17		information from.	17	Q.	So that was a subsequent call. Sor
18	Q.	Let's just look at the ViSION log. So this is the	18		there. There's a subsequent call the
19		Charlie log {INQ000237/1}. There we go. Page 1. So we	19		your statement, but there was a first
20		see there at the bottom of the page at $1.15$ the	20		you're not $$ if you don't rememb
21		first entry opening the incident.	21		that's
22		And then if we go down to page 3 {INQ000237/3},	22	Α.	No, no, 1 remember 1 was $$ so re
23		bottom of the page, at 1.19, you record the information	23		talking to somebody. That's why I
24		that had been received on the call from the trainee and	24		talking to somebody called Moomir
25		at the bottom of the page, you see there, last words:	25		on and what the position was in rela
		133			135
1		"Dinghy appears in good condition."	1		know. I just was aware that I hear
2		Did you discuss the contents with the trainee, the	2		that name.
3		contents of the call that she had had with the French at	3	0	So you overheard part of it because
4		1.06?	4	۹.	proximate to Neal Gibson
5	А	Exactly what we discussed, I can't recall .	5	А	Yes.
6		You can't.	6		—— but it wasn't discussed with yo
7		But the information I got is from what she passed me	7		No.
8		from the call.	8		And you are aware, I think, that a I
9	0	Did you become aware at any point that the information	9	۹.	broadcast off the back of that call.
10	۹.	"dinghy appears in good condition" was incorrectly	10	Α.	Yes.
11		recorded against Charlie?	11		Were you aware that it was broadca
12	А	No. Well, no, because that's why I was briefed that it	12	۹.	Neal Gibson had heard on that call
13		was a $$ in relation to that incident, Charlie, the	13		something you were aware of?
14		information she passed me, because obviously now you can	14	А	I wasn't aware of that. Later on, I
15		look at the transcript perhaps and look at that, but at	15	/	Neal that he was doing it because h
16		the time, obviously I have only got the information that	16		to respond to the incident. But wh
17		she's told me. So that's the information she told me	17		a Mayday Relay — he took the ca
18		that had come from the French.	18		Relay. I was doing what I was doir
19	0	And after entering the information on the log, at 1.20,	19		I really didn't discuss it.
20	۹.	so a minute after, you called Tom Willows at	20	0	Was it usual that he wouldn't tell
21		Border Force and you relayed the information from the	20	<b>بر</b> .	or talk through his reasons with you
21		same call at 1.06 and, again, you said, "Think it's in	21	Δ	He was SMC. I was his assistant.
23		good condition".	22	Π.	making the decisions.
24		And, again, did you tell Border Force this because	23 24	0	Let's go down to page 5 of the log,
25		of what you got from the trainee?	24	<b>بر</b> .	Mayday Relay quickly. Then, sorry,
20		or what you got nom the trainee!	2.2		mayday iteray quickiy. Then, sorry,

- had V. French coastguard, yes.
- at this point of the ood that Incident
- ed on what you

5		understood the French to have told the trainee?
6	Α.	Yes.
7	Q.	After this, we know that Dover received distress calls
8		from those on board Incident Charlie. Are you aware of
9		a call at 1.48 of around 20 minutes with Neal Gibson,
10		the SMC, and the 16-year-old boy called Mubin or
11		possibly known to you as "Moomin", who was known to
12		Dover to be on board Incident Charlie?
13	Α.	I was aware that he was $$ subsequently was $$
14	Q.	That's a subsequent call $$
15	Α.	aware that he was talking to somebody called Moomin.
16		Whether that's
17	Q.	So that was a subsequent call. Sorry to interrupt you
18		there. There's a subsequent call that you discuss in
19		your statement, but there was a first call at 1.48. If
20		you're not $$ if you don't remember that one, then
21		that's
22	Α.	No, no, I remember I was so recall I heard him
23		talking to somebody. That's why I became aware of him
24		telling to conclude all of Manuals. What hast that was

- nin. What boat that was
- elation to that I don't
- ard him using that --
- se you were sitting
- /ou.
- Mayday Relay was then
- Π.
- cast because of what
- or was that not
- I understood from
- he wanted the Flamant
- why he chose to do
- call, chose to do a Mayday
- oing. He is the SMC.
- you what he was doing
- /ou?
- So he was the one
- g, look at the

Mayday Relay quickly. Then, sorry, actually bottom of

the page of 6 so 2.24, so just down one page. So, 1 2 actually, sorry, probably -- there we go {INQ000237/6}: 3 " ... Small craft with 40." 4 And then next page, we see the rest of the Mayday Relay, I think,  $\{INQ000237/7\}$ , the position -- gives the 5 position the coordinates, next to the Sandettie 6 7 Lightvessel: 8 " ... taking water and requiring immediate 9 [assistance] any vessel that can assist to contact Dover 10 [Coastguard].' 11 In your witness statement, you say that you became 12 aware of the Mayday Relay when you heard Neal Gibson 13 making it on the radio. It was, in fact, the JRCC that 14 broadcast the Mayday Relay. Is it likely that this is 15 what you heard? A. No. When I heard Neal Gibson talking about a Mayday 16 17 Relay, I must have heard him talking to Tom Barnett or 18 somebody at JRCC about -- because I just heard "Mayday 19 Relay". But we wouldn't have -- I don't believe we 20 would have heard channel 16 and the broadcast of the 21 Mayday Relay, because that was being monitored --2.2 Q. By the JRCC. 23 A. -- by the JRCC. 24 So what I may have heard -- because, as I say, it is 25 like the length of this room away from me. I may have 137 1 heard him talking to them about doing a Mayday Relay as opposed to him saying "Mayday Relay", because he was 2 3 doing his part and I was doing what I was doing. 4 Q. You say it was an unusual step in your statement. 5 A. Yes 6 Q. Had you previously experienced a Mayday Relay whilst you 7 had been working at the Dover Coastguard in relation to 8 small boat search and rescue? 9 A. No. I don't think so. 10 Q. And you have said that Neal Gibson didn't discuss his

- 11 reasons for broadcasting the Mayday Relay. You do
- 12 mention that later, he told you about the Flamant and 13 you came to understand that was why.
- 14 A. Yes, later on from him, that that's why he was doing it.
- 15 Q. And what did you understand about the status of
- 18 A. That he obviously had some concerns for the vessel.
- 19~ Q. Did, at that point, you believe there was an emergency?
- 20 A. There was certainly a -- well, yes, otherwise he
- 21 couldn't have the -- wouldn't have done the Mayday
- 22 Relay. Something going on that he needed additional
- assistance for and he was asking for that.
- 24
   Q. Let's turn back to the calls. They kept coming in. And

   25
   you, as the only MOO in Dover, that was your main role
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1		in the night's events; is that fair to say? Taking the
2		calls, logging it in ViSION and the tracker.
3	Α.	Yes, so probably, yes.
4	Q.	Let's look at the transcript of a call at 2.25. So this
5		is {INQ007654/1}. Just before the first Mayday Relay
6		was broadcast at 2.27, you took a call with someone who
7		said he was called Jonas, as recorded in the logs, or
8		perhaps Jomash here on the first page of the transcript.
9		If we could go to page 2, please, $\{INQ007654/2\}$ , you
10		say there:
11		"Hello Coastguard."
12		Caller says straight away, halfway down the page:
13		"We need a rescue boat, please. We are sinking. We
14		almost sink."
15		In response, you tell him to tell those around him
16		to stop shouting. You ask his name. He tells you.
17		And then if we go on to page 3 {INQ007654/3}, you
18		ask where he is. You say:
19		" whereabouts are you?"
20		And he's unable to tell you beyond being in the
21		middle of the sea.
22		So after some confusion, some inaudible parts, he
23		then tells you that the boat has lost its engine. You
24		see down the bottom, you say:
25		"What did you lose?"
		120
		139

1	"The engine is open we lost our engine and we
2	don't know our direction."
3	Page 4, please $\{INQ007654/4\}$ , you ask where and when
4	he left . He tells you Dunkirk, 9.00 pm.
5	Page 5, please $\{INQ007654/5\}$ , you ask whether he
6	phoned anyone apart from coastguard. He says no right
7	at the top there, although the sentence then trails off.
8	And then still on page 5, you ask whether he can see any
9	ships. He says he can see a big ship to the left, but
10	far away. You ask about lights.
11	And then, page 6 $\{INQ007654/6\}$ , it cuts off and you
12	can only get limited information on the call from the
13	operator. So we see there at the bottom, you have got
14	the UK operator coming in and you can only get a service
15	provider of Vodafone and what the phone is called, which
16	isn't a telephone number, as I understand it.
17	So this was around five minutes. You didn't attempt
18	to get a WhatsApp position or a geolocation position
19	from the caller. Can you tell me why that was?
20	A. Yes. It cut out before I could do it.
21	Q. Is it right that without having a position, you wouldn't
22	have been able to work out what ship he could see, for
23	example?
24	A. Yes. No, if he could see the ship $$ as I mentioned
25	earlier , some of the ships have large lettering . Some

- 1 of the companies have large letters down the side. So
- it wasn't uncommon to ask if they could see a ship. If 2
- 3 they could, did it have any lettering? So MSC,
- 4 whatever. You could then look on CSCOPE or
- MarineTraffic to see where MSC -- a vessel with "MSC" on 5
- the side would be and then you could work out in 6
- 7 relation to where that was to where they were.
- So asking about vessels or -- and the lights also, 8
- 9 because they have coloured sequences, the lights in the
- 10 Channel. So if they can see -- like the foreign 11
- lightvessel , for example, has got a set sequence for the 12 light that it emits. If they can see a set of coloured
- 13 lights and can tell you what that frequency is in
- 14 relation to where they are, you can then work -- because
- 15 you know where that is. You can then work out from
- 16 there where they are. So that's all aimed towards
- 17 trying to find out where they are.
- 18 Q. So that was your aim in asking whether you could see
- 19 ships and the lights, but unfortunately, this person
- 20 couldn't give you any information that could identify
- 21 a ship —
- A. That's correct. 2.2
- $\mathsf{Q}.\ --$  or lights. So without that, it would be 23
- 24 impossible -- without a geolocation information from 25
  - WhatsApp or on Google Maps, you wouldn't able to find

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- 1 out what the ship was without him telling you.
- A. No, that's correct. With the MSC, or whatever, or 2
- 3 Costco or any of those large companies or the
- 4 cross-Channel ferries, then yes, we'd be able to work
- 5 out where they are then in relation to that --
- 6 Q. But in this case, it wasn't possible.
- 7 A. In this case, he couldn't give the name.
- 8 Q. You didn't ask for a phone number from this caller. Why 9 was that?
- 10 A. I guess because we got cut off before we got to this
- 11 stage. As I said earlier , they're giving information,
- 12 so you're trying to follow the natural flow of what is
- 13 going. Because on English isn't their first language, so trying to keep the conversation going in a way that 14 15 they obviously could understand.
- 16 Q. Would you have asked had you not got cut off?
- 17 A. Yes, and kept the conversation going until we actually 18 got the information we needed.
- 19  $\mathsf{Q}.\;$  We know from the Incident Charlie log that Neal Gibson
- 2.0 identified this call as coming from Incident Charlie, 21 the incident for which the Mayday Relay had been
- 2.2 broadcast.
- 23 Let's bring that up again, so  $\{INQ000237/9\}$ , please.
- 24 If we go to page 9, at 2.48 in the morning, top of the
- 25 page, you can see there Neal Gibson writing the entry

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- 1 about the Jonas call and it includes information that,
- 2 "We are sinking", that they can see a big ship, and it's
- 3 identified as a repeat of Charlie.
  - Insofar as you are able to answer, do you know why
- this call was made a repeat of Charlie? What was it 5
- about the call that --6
- 7 A. I don't know. sorry.
- Q. Would you agree that the information that HM Coastguard 8
- 9 had from the call at face value was that
- 10 Incident Charlie was a sinking small boat?
- 11 A. From that information, yes.
- 12 "Yes" is that? Q
- 13 A. Yes, from that information, but ...
- 14 Q. And would you agree that the language "We are sinking,
- 15 we almost sink" is not ambiguous?
- 16 A. It isn't, but it's not uncommon to receive that as
- 17 a message when they weren't.
- 18 Q. But taking the call at face value --
- 19 A. Yes
- 20 Q. -- it's consistent with the content of the Mayday Relay 21
- broadcast that Charlie was taking on water and in need 22 of immediate assistance.
- 23 A. Yes
- 24 Did you believe then that Incident Charlie was sinking Q
- 25 and in real and imminent danger as a result?

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- 1 A. It was obviously -- it was obviously of concern enough 2 for the SMC to do a Mayday Relay, which is unusual. So 3 yes, it was in a more precarious position than 4 ordinarily we had come to expect. 5 Q. Just after you come off the call with Jonas or Jomash, 6 at 2.31, Neal Gibson took his second call with Mubin, 7 and this is the one that you talk about in your 8 statement. 9 A. Oh. right. okav. 10 Q. And you say that Neal Gibson was speaking with a raised 11 voice. The call was animated and that you told 12 Tom Barnett at the JRCC that Neal Gibson was having 13 a row with the caller. Given that coastguard had information that the small 14 15 boat on which Mubin was board was sinking at face value. 16 it's difficult for me to understand why you would be having a row with a caller from that small boat. Are 17 18 you able to assist on that, having been there during the 19 night? 20 A. I don't know what -- obviously Neal (inaudible) -- he is 21 trying to bring the assistance and he's being -- he 2.2 can't do this when he's talking to somebody who is 23 passing information that they have given already. But 24
- exactly what is in his mind, I can't comment, obviously. 25  $\mathsf{Q}.\;\;\mathsf{Was}$  it something out of the ordinary to hear coastguard

March 13, 2025

1		staff, in your words, having a row with small boat
2		callers ?
3	Α.	Asking people to stop shouting or to keep quiet, that
4		was normal because there would be lots of noise in the
5		background and you couldn't hear what was going on. If
6		you listen to the transcripts, you could hear that,
7		actually, it's difficult to hear. So asking people
8		trying to get people to
9	Q.	Is that what you meant by having a row? That he was $$
10		Yes, he was trying to calm everybody down in a raised
11		voice to be overheard above the noise of the phone, that
12		you've got to keep —— otherwise, you can't assist
13		because you can't hear. You can't work out what's going
14		on.
	0	
15	Q.	Around 10 minutes later at 2.42 in the morning — we can
16		take this down from the screen, thank you $$ Neal Gibson
17		spoke to French coastguard about Incident Charlie and in
18		the course of this call, French coastguard told
19		Neal Gibson that those on board had said, "Help me, help
20		me, help me. We are in the water."
21		Were you aware of this call?
22	Α.	I don't recall being aware of it, no.
23	Q.	Did Neal Gibson tell you that the information from
24		Gris-Nez was that there were potentially people in the
25		water?
		145
		110
-		
1		No, not that I recall .
2		No, not that 1 recall . The next calls in the chronology are two calls that you
2 3		No, not that I recall . The next calls in the chronology are two calls that you took the first at 3.06 and the second at 3.12, and let's
2 3 4		No, not that I recall . The next calls in the chronology are two calls that you took the first at $3.06$ and the second at $3.12$ , and let's look at the transcript of the $3.06$ call first , so this
2 3 4 5		No, not that I recall . The next calls in the chronology are two calls that you took the first at 3.06 and the second at 3.12, and let's look at the transcript of the 3.06 call first , so this is $\{INQ007657/1\}$ . We see there the time and your name.
2 3 4 5 6		No, not that I recall . The next calls in the chronology are two calls that you took the first at 3.06 and the second at 3.12, and let's look at the transcript of the 3.06 call first , so this is {INQ007657/1}. We see there the time and your name. If we go to page 3, which is where the transcript
2 3 4 5 6 7		No, not that I recall . The next calls in the chronology are two calls that you took the first at 3.06 and the second at 3.12, and let's look at the transcript of the 3.06 call first , so this is $\{INQ007657/1\}$ . We see there the time and your name.
2 3 4 5 6		No, not that I recall . The next calls in the chronology are two calls that you took the first at 3.06 and the second at 3.12, and let's look at the transcript of the 3.06 call first , so this is {INQ007657/1}. We see there the time and your name. If we go to page 3, which is where the transcript
2 3 4 5 6 7	Q.	No, not that I recall. The next calls in the chronology are two calls that you took the first at 3.06 and the second at 3.12, and let's look at the transcript of the 3.06 call first, so this is {INQ007657/1}. We see there the time and your name. If we go to page 3, which is where the transcript starts {INQ007657/3}, you see there the operator stating
2 3 4 5 6 7 8	Q. A.	No, not that I recall. The next calls in the chronology are two calls that you took the first at 3.06 and the second at 3.12, and let's look at the transcript of the 3.06 call first, so this is {INQ007657/1}. We see there the time and your name. If we go to page 3, which is where the transcript starts {INQ007657/3}, you see there the operator stating there was no number displayed.
2 3 5 6 7 8 9	Q. A.	No, not that I recall . The next calls in the chronology are two calls that you took the first at 3.06 and the second at 3.12, and let's look at the transcript of the 3.06 call first , so this is {INQ007657/1}. We see there the time and your name. If we go to page 3, which is where the transcript starts {INQ007657/3}, you see there the operator stating there was no number displayed. Yes.
2 3 6 7 8 9	Q. A. Q.	No, not that I recall . The next calls in the chronology are two calls that you took the first at 3.06 and the second at 3.12, and let's look at the transcript of the 3.06 call first, so this is {INQ007657/1}. We see there the time and your name. If we go to page 3, which is where the transcript starts {INQ007657/3}, you see there the operator stating there was no number displayed. Yes. So they hadn't been able would this be a 999
2 3 6 7 8 9 10 11	Q. A. Q.	No, not that I recall . The next calls in the chronology are two calls that you took the first at 3.06 and the second at 3.12, and let's look at the transcript of the 3.06 call first, so this is {INQ007657/1}. We see there the time and your name. If we go to page 3, which is where the transcript starts {INQ007657/3}, you see there the operator stating there was no number displayed. Yes. So they hadn't been able —— would this be a 999 operator?
2 3 4 5 6 7 8 9 10 11 12	Q. A. Q.	No, not that I recall . The next calls in the chronology are two calls that you took the first at 3.06 and the second at 3.12, and let's look at the transcript of the 3.06 call first, so this is {INQ007657/1}. We see there the time and your name. If we go to page 3, which is where the transcript starts {INQ007657/3}, you see there the operator stating there was no number displayed. Yes. So they hadn't been able —— would this be a 999 operator? Yes, if it is on to the coastguard rescue, it's
2 3 4 5 6 7 8 9 10 11 12 13	Q. A. Q.	No, not that I recall . The next calls in the chronology are two calls that you took the first at 3.06 and the second at 3.12, and let's look at the transcript of the 3.06 call first, so this is {INQ007657/1}. We see there the time and your name. If we go to page 3, which is where the transcript starts {INQ007657/3}, you see there the operator stating there was no number displayed. Yes. So they hadn't been able —— would this be a 999 operator? Yes, if it is on to the coastguard rescue, it's a 999 call. If it is UK coastguard, it is a routine
2 3 4 5 6 7 8 9 10 11 12 13 14	Q. A. Q. A.	No, not that I recall . The next calls in the chronology are two calls that you took the first at 3.06 and the second at 3.12, and let's look at the transcript of the 3.06 call first , so this is {INQ007657/1}. We see there the time and your name. If we go to page 3, which is where the transcript starts {INQ007657/3}, you see there the operator stating there was no number displayed. Yes. So they hadn't been able —— would this be a 999 operator? Yes, if it is on to the coastguard rescue, it's a 999 call. If it is UK coastguard, it is a routine call , and the operator would only come on if there was
2 3 6 7 8 9 10 11 12 13 14 15	Q. A. Q. Q.	No, not that I recall . The next calls in the chronology are two calls that you took the first at 3.06 and the second at 3.12, and let's look at the transcript of the 3.06 call first , so this is {INQ007657/1}. We see there the time and your name. If we go to page 3, which is where the transcript starts {INQ007657/3}, you see there the operator stating there was no number displayed. Yes. So they hadn't been able —— would this be a 999 operator? Yes, if it is on to the coastguard rescue, it's a 999 call. If it is UK coastguard, it is a routine call , and the operator would only come on if there was a 999 call and they would be there throughout ——
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16	Q. A. Q. A.	No, not that I recall . The next calls in the chronology are two calls that you took the first at 3.06 and the second at 3.12, and let's look at the transcript of the 3.06 call first , so this is {INQ007657/1}. We see there the time and your name. If we go to page 3, which is where the transcript starts {INQ007657/3}, you see there the operator stating there was no number displayed. Yes. So they hadn't been able —— would this be a 999 operator? Yes, if it is on to the coastguard rescue, it's a 999 call. If it is UK coastguard, it is a routine call, and the operator would only come on if there was a 999 call and they would be there throughout —— So this is a 999?
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17	Q. A. Q. A.	No, not that I recall. The next calls in the chronology are two calls that you took the first at 3.06 and the second at 3.12, and let's look at the transcript of the 3.06 call first, so this is {INQ007657/1}. We see there the time and your name. If we go to page 3, which is where the transcript starts {INQ007657/3}, you see there the operator stating there was no number displayed. Yes. So they hadn't been able —— would this be a 999 operator? Yes, if it is on to the coastguard rescue, it 's a 999 call. If it is UK coastguard, it is a routine call, and the operator would only come on if there was a 999 call and they would be there throughout —— So this is a 999? Yes.
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18	Q. A. Q. A.	No, not that I recall . The next calls in the chronology are two calls that you took the first at 3.06 and the second at 3.12, and let's look at the transcript of the 3.06 call first , so this is {INQ007657/1}. We see there the time and your name. If we go to page 3, which is where the transcript starts {INQ007657/3}, you see there the operator stating there was no number displayed. Yes. So they hadn't been able —— would this be a 999 operator? Yes, if it is on to the coastguard rescue, it 's a 999 call. If it is UK coastguard, it is a routine call , and the operator would only come on if there was a 999 call and they would be there throughout —— So this is a 999? Yes. And the operator states there's no number displayed, but
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19	Q. A. Q. A.	No, not that I recall . The next calls in the chronology are two calls that you took the first at 3.06 and the second at 3.12, and let's look at the transcript of the 3.06 call first , so this is {INQ007657/1}. We see there the time and your name. If we go to page 3, which is where the transcript starts {INQ007657/3}, you see there the operator stating there was no number displayed. Yes. So they hadn't been able —— would this be a 999 operator? Yes, if it is on to the coastguard rescue, it's a 999 call. If it is UK coastguard, it is a routine call, and the operator would only come on if there was a 999 call and they would be there throughout —— So this is a 999? Yes. And the operator states there's no number displayed, but the operator had guessed that this was for coastguard
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20	Q. A. Q. A.	No, not that I recall. The next calls in the chronology are two calls that you took the first at 3.06 and the second at 3.12, and let's look at the transcript of the 3.06 call first, so this is {INQ007657/1}. We see there the time and your name. If we go to page 3, which is where the transcript starts {INQ007657/3}, you see there the operator stating there was no number displayed. Yes. So they hadn't been able —— would this be a 999 operator? Yes, if it is on to the coastguard rescue, it 's a 999 call. If it is UK coastguard, it is a routine call, and the operator would only come on if there was a 999 call and they would be there throughout —— So this is a 999? Yes. And the operator states there's no number displayed, but the operator had guessed that this was for coastguard despite the caller not asking directly for coastguard. You say:
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. A. Q. A.	No, not that I recall . The next calls in the chronology are two calls that you took the first at 3.06 and the second at 3.12, and let's look at the transcript of the 3.06 call first , so this is {INQ007657/1}. We see there the time and your name. If we go to page 3, which is where the transcript starts {INQ007657/3}, you see there the operator stating there was no number displayed. Yes. So they hadn't been able — — would this be a 999 operator? Yes, if it is on to the coastguard rescue, it's a 999 call. If it is UK coastguard, it is a routine call, and the operator would only come on if there was a 999 call and they would be there throughout —— So this is a 999? Yes. And the operator states there's no number displayed, but the operator had guessed that this was for coastguard despite the caller not asking directly for coastguard. You say: " good guess"
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22 23	Q. A. Q. A.	No, not that I recall . The next calls in the chronology are two calls that you took the first at 3.06 and the second at 3.12, and let's look at the transcript of the 3.06 call first , so this is {INQ007657/1}. We see there the time and your name. If we go to page 3, which is where the transcript starts {INQ007657/3}, you see there the operator stating there was no number displayed. Yes. So they hadn't been able — — would this be a 999 operator? Yes, if it is on to the coastguard rescue, it's a 999 call. If it is UK coastguard, it is a routine call, and the operator would only come on if there was a 999 call and they would be there throughout —— So this is a 999? Yes. And the operator states there's no number displayed, but the operator had guessed that this was for coastguard despite the caller not asking directly for coastguard. You say: " good guess" And then you start speaking to the caller from the
2 3 4 5 6 7 8 9 10 11 12 13 14 15 16 17 18 19 20 21 22	Q. A. Q. A.	No, not that I recall . The next calls in the chronology are two calls that you took the first at 3.06 and the second at 3.12, and let's look at the transcript of the 3.06 call first , so this is {INQ007657/1}. We see there the time and your name. If we go to page 3, which is where the transcript starts {INQ007657/3}, you see there the operator stating there was no number displayed. Yes. So they hadn't been able — — would this be a 999 operator? Yes, if it is on to the coastguard rescue, it's a 999 call. If it is UK coastguard, it is a routine call, and the operator would only come on if there was a 999 call and they would be there throughout —— So this is a 999? Yes. And the operator states there's no number displayed, but the operator had guessed that this was for coastguard despite the caller not asking directly for coastguard. You say: " good guess"

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1 They go on to say -- you say: 2 "Okay, go on." 3 "Yeah, we are on our way to England and our boat, we 4 lose our (Inaudible) -- we are sinking. (Inaudible) part of our body is in the sea and it is very cold." 5 6 There's then some information about who was on 7 board, so bottom of page 3 and top of page 4 8  ${INQ007657/4}$ , and then if we could go on to page 4, 9 there is some confusion about trying to provide numbers 10 and then the call cuts off and then you see the operator 11 and you ask for details on the call. 12 So the caller told you in that call that part of his 13 body was in the sea and the small boat was sinking. Was 14 this something that you believed at face value? 15 A. Saying that, I've got no reason to disbelieve it other than that's quite a common thing for people to say and 16 17 there were other calls that night saying similar 18 things --19 Q. But you --20 A. -- that clearly weren't sinking. 21 Q. Sorry, say that again? 2.2 A. Clearly weren't -- the others weren't -- now with hindsight, looking back, you can see that the others 23 24 that also said they were sinking or in difficulty 25 weren't sinking or weren't in difficulty when they came 147 1 across. But we responded to the incidents based on the

- 2 information that was reported, so taking the 3 information. They said they are sinking, said they are 4 in the water, gets dealt with that way. 5  $\mathsf{Q}.\;$  You created a new incident for this call , but you didn't 6 give it a phonetic alphabet reference and you closed it 7 as a repeat of the migrant admin log. Let's look at the 8 admin log where that's recorded, so  $\{INQ000235/1\}$ . 9 You know what I am talking about when I say the 10 migrant administration log? 11 A. Yes 12  ${\sf Q}.\;$  Can you just explain your understanding of how that 13 should be used? 14 A. There was administrative messages around that for the 15 small boat activity for that particular watch, as far as 16 I was aware. 17  $\mathsf{Q}.\;$  Why would you have put that call into the migrant
  - administration log?
    A. I don't know, but I couldn't -- wo
  - A. I don't know, but I couldn't -- wouldn't be able to
     close it and sort of move it around without the SMC
     say-so.
  - 22 Q. Let's look at the entry. So at page 7 {INQ000235/7},
  - the entry is at 3.22. There we see at the top -- we seeyou recording that the caller didn't ask directly for
- 25 the coastguard and you have recorded what they said

1		about losing the engine, who was on board.
2		You didn't record that the caller said that he was
3		sinking and part of his body was in the sea. Why was
4		that not recorded?
5	Α.	Obviously I have put there are people in the sea. Also
6		obviously now we have got the benefit of listening the
7		transcript . I am trying to remember what was said in
8		the call . Fine. Now, having the transcript, you can
9		read exactly what was said, but at the time, you are
10		listening to noisy, noisy background, what was said, so
11		${\sf I}$ may have missed that part of the message. So with the
12		transcript now, it's easy to look at that, but at the
13		time, trying to listen to the garbled messages, the wind
14		noise, the noise of the background, etc, it is
15		difficult . So maybe I missed that part.
16	Q.	But you have pointed out that you said there were people
17		in the sea at the bottom, even if you hadn't perhaps
18		strictly recorded entirely what he had said.
19		You have told me that Neal Gibson would have been
20		the one who would have decided to close it as
21		a repeat ——
22	Α.	Yes.
23	Q.	of the migrant admin log. Are you able to tell me
24		why it was closed as a repeat of this migrant
25		administration?

2	Q.	Just a final point. All the entries on ViSION in
3		relation to this incident are by you. Is there any
4		chance that Neal Gibson may not have been aware of this
5		or was that not how it worked?
6	Α.	No, no, it was $$ as a MOO, I wouldn't have had the
7		authority to shut it down.
8	Q.	The caller here has before told you they were sinking
9		and partially in the water. Did you consider that this
10		call resembled the other call from Incident Charlie that
11		we have just looked at, the call with Jonas or Jomash
12		and the Mayday Relay?
13	Α.	It was similar, but it's similar to other calls that
14		night as well. On other calls on other occasions, the
15		messages were fairly similar .

16	Q.	Let's	now l	ook at	the	call	at 3	.12.	So you	ı took this	5
17		more	or less	direc	tly	after	the	3.06	call .	So	

- 18  $\{INQ007658/2\}$ , please, and there we see the time, date,
- 19 you and the caller, page 2. You say:

 $1 \quad \ \ A. \ \ I \ \ don't \ know. \ \ I \ \ don't \ know, \ sorry.$ 

- 20 "... what's the problem?"
- 21 After introductions. The caller says:
- 22 "In the water ... in the water."
- 23  $% \left( {{\rm{You}}}\right)$  You ask whether the caller had just called , but the
- 24  $$\ensuremath{\mathsf{speaker}}$  either doesn't hear or doesn't understand. You
- 25  $% \left( {{\rm{ask}}} \right)$  where the caller is . The caller is unable to say

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1	beyond that he's in the water. You see there at the
2	bottom, you say:
3	"Whereabouts in the water are you?"
4	And he says:
5	"In the water, in the water."
6	"Yeah, but where in the water? Where are you near?"
7	"(Inaudible)."
8	Next page, please {INQ007658/3}. So you say:
9	"Where are you?"
10	He says:
11	" Finished "
12	And asks for coastguard to come. You say that you
13	need to know where they are before you can come. Caller
14	appears to misunderstand and starts giving information
15	about people on board. We see some numbers there. You
16	tell him to stop shouting. The caller doesn't hear or
17	doesn't understand. You repeat not to shout and the
18	caller continues giving numbers.
19	Page 4 {INQ007658/4}, you then try to get
20	a description of the vessel . Caller says that he
21	doesn't understand, repeats it's finished . Middle of
22	the page, you then ask again:
23	"Whereabouts are you?"
24	And he says:
25	"What you say?"

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1	You say:
2	"Where are you? Where are you?"
3	He says he doesn't understand and you then say to
4	dial 999 as that might give a position. Caller again
5	asks for help.
6	Page 5 {INQ007658/5}, you say:
7	"Okay, where are you?"
8	He says:
9	"On the water, on the water."
10	You say:
11	"Okay, whereabouts in the water?"
12	He says:
13	"In the water."
14	You say:
15	"Okay, I get you're in the water, but whereabouts?
16	lt's a big, big sea."
17	He says:
18	"Please can you help me? I am finished finished
19	can you please? Hello?"
20	You say:
21	"Yeah yeah whereabouts are you? The English
22	Channel is a big place. Hello?"
23	He says:
24	"Finish, finish finish."
25	You say:
	152

1		"But where are you?"
2		He says:
3		"On the water, on the water."
4		You say:
5		"I know you're on the water. You don't need to keep
6		shouting at me that you're on the water. I know that.
7		But whereabouts on the water?"
8		He says:
9		"England water, England water."
10		Page 6, please {INQ007658/6}:
11		"Yeah, yeah."
12		You say:
13		"Whereabouts?"
14		"Yeah, yeah"
15		"Whereabouts are you in the English waters?"
16		"Yeah, yeah, English water."
17		You then tell him to hang up and dial 999 as that
18		might give you his position and when he says it's not
19		working, then, page 7 $\{INQ007658/7\},$ you say that it's
20		probably because he's still in French waters, and the
21		call ends with him saying, "No".
22		So you have said in your statement that it was
23		extremely important to find the location of a small
24		boat; correct?
25	Α.	Correct.
		153

1  $\mathsf{Q}.$  And it's right in this call , I think, that you were trying to get information about his location and this is 2 presumably why you were asking him, "Where are you?" 3 4 The caller couldn't give you any information, any 5 precise information; correct? 6 A. Correct. 7  ${\sf Q}. \ \mbox{You didn't ask him to share his location using WhatsApp}$ or try to guide him through Google Maps. Is there 8 9 a reason why you didn't do that as a priority given his 10 inability to give you any meaningful information about 11 where he was? 12 A. No, as you said, 1've just come from -- straight from 13 another call and getting similar information, trying to work out what they have got. Perhaps I could have asked 14 him to dial 999 sooner because obviously, as 15 I explained, trying to get -- dial 999 is a way of 16 17 trying to get that information, because with the 18 systems, it may give us a better location. 19 So also, it is quite common. People say they are in 20 the water when they mean they are in a boat which is on 21 the water. So from experience, people say it quite 22 often, "We are in the water". When you actually drill 23 down into it, they are not actually in the water. They 24 are in a boat which is on the water. 25 Q. So it is a language problem --

- - .

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1	Α.	It's quite common.
2	Q.	as opposed to exaggeration, potentially.
3	Α.	Yes, that particular part, but people saying that they
4		are sinking, they're all going to die, there is lots of
5		women and children, pregnant people on board, etc, then
6		when you get there, it isn't, that's quite normal.
7		But obviously, in this one, as you say, I have just
8		come from the other call. If you listen to the tape $$
9		the transcript is easy to read and think: well, what
10		about this point? You look at things saying: well, what
11		about doing this? What about doing that? When you
12		actually listen to the $$ to the tapes, you can hear $$
13		you say it $% \left( {{\mathbf{F}}_{\mathbf{r}}} \right)$ earlier . You're trying to keep the $$ engage
14		them in conversation, trying to get some information,
15		but then $$ and try to $$ okay, where? "Well, we have
16		just left Dunkirk or we've just left Calais or we've
17		just left the Pan or wherever", it gives you a bit of
18		a clue.
19		But yes, I could have perhaps asked dial 999 sooner.
20	Q.	And his name? Might you have asked his name sooner?
21	Α.	Yes, I could have done.
22	Q.	And telephone number?
23	Α.	Could have done.
24	Q.	At the end of the call, as you have told us, you asked
25		him to dial 999. You say you could have done that
		155
1		earlier .

1	earlier .
2	Now, how likely was it, in your view, that that
3	would work? You had just been on a 999 call where it
4	wasn't possible to get any information.
5	A. It may have $$ it may have worked. I've got nothing
6	else. He can't give me the latitude and longitude. He
7	can't tell me where they are in relation to France or
8	the UK, other than between the two. So any options
9	going $$ we are actually trying to help people and
10	actually trying to bring the rescue to people, so we are
11	trying to elicit the information.
12	We know the people $$ somebody is in distress or ir
13	trouble. We want to bring help to them. Actually, we
14	are trying to find out the information. It's not the
15	case of, oh, we are not $$ it's not that we are not
16	interested. We are interested and we do want to bring
17	the care, but trying to get the information is
18	difficult .
19	So yes, with hindsight, it is fantastic and, yes,
20	maybe could have asked the questions in a slightly
21	different order, but at the time, if you listen to the
22	transcript $$ listen to the recording, that seems $$ it
23	seems logical or appropriate at the time, but obviously
24	you can always review things and come back, oh, we could
25	have tried this or could have tried that.

1 Q. You say that in your statement that asking them to call 2

- 999 was not part of your formal training, but it was
- 3 a standard practice.
- 4 A Yes
- Q. Correct? Was it a standard practice -- had you learned 5 it from others at Dover? Was that where --6
- 7 A. Yes
  - $\mathsf{Q}.$  And the call ends with you telling the caller that if
- 8 9 his phone is not connecting to 999, as we have seen, he
- 10 is probably still in French waters. In your statement,
- 11 you say you would often explain to callers -- tell
- 12 callers they were still in French waters if a 999 call
- 13 did not connect.
- 14 A. Yes

25

- 15 Q. Yes. Again, did you learn this as part of any formal training or was it a practice picked up at Dover? 16
- A. It's a practice at Dover, because obviously, the more we 17 18 had to try and work out -- because even just narrowing
- 19 it down to they are in the French side, that gives you 2.0
- at least an indicator of which side of the Channel to 21
- start looking for people. It wasn't that we -- and then 22
- we could perhaps alert the French to that. But that --23 yes, that was a practice at Dover.
- 24 Q. In your view then, was the ability to connect to the UK
  - 999 system a reliable indicator of which side of the

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- 1 median line the small boat ---
- 2 A. As far as I was aware, ves.
- 3 Q. And as with the 3.06 call, you created a new incident
- 4 for this call. No phonetic alphabet reference again and
- 5 it was again closed as a repeat of the migrant
- administration log. 6
- 7 If we could just go back to that log again, so
- 8  ${INQ000235/6}$ , entry at 2.22 -- sorry, yes, 2.21.
- 9 That's right one. You record there what happened on the
- 10 call :
- ... I am in [the water]." 11
- 12 "Where are you?"
- 13 You record in brief form the contents of the call .
- 14 You may again not be able to answer this, but why
- 15 was this never assigned to any incident?
- 16 A. I don't know.
- Q. Again, was Neal Gibson informed about this call? 17
- 18 A. I would take it, yes, because I wouldn't be able to
- 19 shut -- to close a log without the SMC saying so.
- 20 Q. So even though you are entering the information, he will
- 21 have had to authorised it in order for you to do so.
- 2.2 A. I can't see it would have been different, no.
- 23 Q. And did you consider that this call resembled the other 24 calls from Incident Charlie?
- 25 A. All the calls, whichever boat, tend to resemble them,

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- 1 a similar message.
- Q. Following these calls, did you understand that there was 2 3 a small boat sinking and that those on board were
- 4 fully -- sorry, in imminent danger of fully entering the 5 water?
- A. I understood that there were the reports of that, but as 6 7 I said, most boats most evenings would say exactly the 8 same or very similar.
- 9  $\mathsf{Q}.\;$  So are you saying that you are unsure or that this was 10 a case of exaggeration?
- 11 A. I don't know. We're obviously still treating it as
- 12 an incident, but experience showed that once you got to
- 13 an incident, it was rarely as catastrophic as it was
- 14 being made out, but it would still be treated as if it was
- 15

25

3

- 16 Q. No further calls that night from Mubin, Jonas. Why did 17 you believe the calls stopped?
- 18 A. Normally, they stopped once people were collected by
- Border Force or a lifeboat asset. That was normally the 19 20 reason why they stopped.
- 21 Q. Did it ever cross your mind that they might have stopped 22 because the small boat had become swamped or people had 23 entered the water?
- 24 Α Not for a specific case, no, because that's not what

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- 1 Q. I want to just now turn to the identification of the 2 three small boats embarked by the Valiant on the night.
  - A. Okay. Q. So let's turn up the Charlie ViSION log, {INQ000237/11},
- 4 5 from page 11, please. So we can see there Neal Gibson's
- entry at 3.50 that Valiant was on scene with the 6
- 7 first small boat, which was stopped in the water.
- 8 And then at 03.56, we see your entry providing the
- 9 Mike number. That's the number for Border Force that
- 10 was spraved on the vessel.

the -- no, it didn't.

- 11 A. Yes. Well, we didn't provide the Mike number. That's 12 from Border Force.
- 13 Q. Sorry, you are entering the Mike number in the ViSION log. 14
- 15 A. I meant -- that's me recording the message I can hear
- 16 between Border -- Border Force MCC talking to Valiant,
- so I have entered into Valiant's -- the asset Valiant 17
- 18 entered in the message, because one of the things we did
- 19 where we could, if you heard a transmission between
- 2.0 one resource to another resource, you would capture the 21
- message that they had passed, so typing into Valiant the 2.2
- resource from MCC, what MCC was saying to Valiant.
- 23 That's why that was in there.
- 2.4 Q Oh, I see. That's why it says from MCC, because

25 essentially , you are listening into someone else's call

- 1 and recording it.
- 2 A. Yes, that's it . MCC are talking directly to Valiant and
- 3 when you can hear, you do it for the incidents, coastal
- 4 teams, etc. If you overheard a message between
- 5 one asset to another, as best you could, you could type 6 that into that log. So try to capture as much
- 6 that into that log. So try to capture as much
- 7 information as possible. So yes, that's why it is
   8 Valiant, from MCC to Valiant. That's my number
- Valiant, from MCC to Valiant. That's my number.
   O Then 4.16 bottom of the page Neal Gibson says:

2	Q. Then 4.10, bottom of the page, near dibson says.
10	"Persons on board haven't spoken to [coastguard
11	that] evening."

- 12 The next page, page 12 {INQ000237/12}, 04.36, again 13 Neal Gibson:
- 14 "All ... disembarked ... marked and strobe ..."
- 15 And then 04.45 -- sorry, then -- yes, 04.45, you
- 16 then add information about the Valiant going to a new
- $17\,$   $\,$  position from the helicopter, R 163. And 05.21, we see
- $18\,$  there again you recording that the Valiant was engaging
- 19 that vessel, and you provide the location coordinates.
- 20 And, actually, everything else on this page is all you 21 entering it.
- 22 Then 6.07 at the bottom there, you see the
- 23 third tasking in the vicinity of Southwest Goodwin,
- 24 which, as I understand it, is a different area from the
- 25 Sandettie area, so Valiant then moved off.

- Next page {INQ000237/13}, at 6.31 there, you see you

   again entering from MCC M959. So, again, would that

   have been you overhearing MCC speaking to Valiant?
- 4 A. Yes
- 5 Q. So would you agree that on the face of the Charlie log, 6 the entries from 3.50 in the morning until 6.45 in the 7 morning record the three yessels embarked by the
- 7 morning record the three vessels embarked by the8 Valiant, the Mike numbers for two of them, the first and
- 9 the third, but at no point is there any positive
- identification of any of those small boats as beingIncident Charlie?
- 12 A. Not that I am aware of. Obviously, the Valiant entries 13 for the asset --- if you enter information into an asset,
- 14 if the asset's assigned to an incident, it automatically
- 15 populates the incident that it's assigned to. So just
- 16 on this case, Valiant was assigned to Incident Charlie.
- 17 Every update that goes in a separate screen into
- 18 Valiant's asset, all those updates will automatically go
- 19 into the log that the assets assigned to, so --
- 20 Q. It is the system doing it.
- 21 A. Yes --
- 2 A. 165 --
- 22~ Q. It's not you choosing to put it in a Charlie log. The
- 23 system sends it into the --
- A. Correct, so I -- because you can see that -- from that,
   from the fact it says "Valiant" in the column, you
  - 162

1 see -- where you see my name and then "Valiant" --2 Q. Yes. 3 A. -- where "Valiant" is in the column, that's because 4 I made the entry into Valiant's -- updating the asset, 5 updating the information from the asset, and because it is assigned to an incident, the computer automatically 6 7 populates the incident it is assigned to. So that's not 8 me doing it for that incident. It is me updating the 9 asset and information from them and then the computer is 10 automatically updating that incident. 11 Q. Would you agree that looking at the log and seeing 12 everything -- three small boats recorded on this log is 13 capable of causing some confusion perhaps if you are not 14 in the operations room or someone coming in on the next 15 day looking at this? 16 A. It could do. That's why earlier. I sort of said using 17 JESIP and a joint decision-making model, perhaps 18 recording things in that format for specific incidents 19 and perhaps having a box that you could tick to update 2.0 automatically an incident and the assets assigned to as 21 opposed to it just being part of the programme, that it 22 just did update the incident, it would change the 23 process 24 Is this part of the reason why you thought coastguard Q 25 systems weren't designed or weren't capable of managing 163

1 the small boat --

2	Α.	Yes. Yes, because generally, say you've got a person
3		who's fallen down a cliff, a coastguard team,
4		a helicopter sector are all assigned to that incident.
5		So any update they pass is going to be connected to that
6		incident because they're only dealing with the one.
7		Obviously, on this $$ this and other small boats,
8		they're dealing with multiple incidents, but the system,
9		while it is assigned to a particular incident, is going
10		to start updating that incident with everything to do
11		with that asset.
12	Q.	As we have seen, just looking at again those entries
13		from 03.50 til 06.46, none of them are recorded as
14		a small boat that's swarmed or sinking or people in the
15		water.
16		Did you know on the night which of the small boats
17		embarked by the Valiant was Incident Charlie?
18	Α.	I didn't know, no. The SMC would keep track of that.
19	Q.	And from your knowledge of what was happening in the
20		operation room on the night, do you know why there was
21		no written record that Incident Charlie had been rescued
22		by the end of the night watch?
23	Α.	I don't know. Again, that's a matter the SMC would be
24		overseeing.
25	Q.	You have told the Inquiry that when you finished your

24

25

25

are looking for.

- 1 shift on 24 November, you believed that all vessels had
- been accounted for. Can you explain why you believed
- 3 that?

2

- 4 A. To the best of my knowledge, for example, Rescue 163, so 5 the helicopter call sign R 163, Rescue 163, is assigned
- 6 to dealing with search and rescue. It would be
- 7 coastguard 163 if it wasn't. So Rescue 163 was out
- 8 doing search and rescue missions. My understanding was
- 9 it went to look for three small boats in a particular
- 10 area and had found three small boats in that particular
- 11 area. So as far as I was aware, there weren't any
- 12 outstanding. But the actual conduct of all the missions
- 13 would be down to the SMC, but as far as I was aware from
- 14 the information I would overhear, everybody was 15 accounted for
- 16 Q. So you sent the helicopter. Helicopter hadn't found
- 17
   a sinking small boat, so your assumption or your

   18
   conclusion was that -
- 19 A. Well, I hadn't sent the helicopter to the small boat.
- 20 Q. Sorry, Dover Coastguard had sent --
- 21  $\,$  A. Yes, but my understanding was that it has gone to look
- 22 for three small boats. It found three small boats. As
- $23 \qquad \ \ I \ \ said \ \ before, \ most of the small boats report that they$
- $24 \qquad \ \ \, \mbox{are in more severe distress than they were, so finding}$
- 25  $\qquad$  an asset -- finding a small boat that wasn't in that

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1 much distress in line with -- compared to what had been 2 reported was normal. 3 It had been sent to look for three boats. It found 4 three boats, my understanding is. So the correlation 5 and connection of the incidents to each other, that's a matter that the SMC would oversee. 6 7 Q. But the calls you had taken, for example, from Jomash or 8 Jonas, that was identified as Charlie, had told you that 9 it was sinking, the Mayday Relay identified a small boat 10 taking on water and in need of immediate assistance, 11 none of the small boats embarked by the Valiant found by 12 R 163 were in that condition, so what happened to that 13 small boat? A. I don't know. As I said, all the --99% of the small 14 15 boats will report they are in a much more serious 16 condition than they -- adverse condition than they are. 17 So finding boats which weren't anywhere near as badly as 18 was being reported was normal, so there was -- and 19 obviously, in relation to boats, small boats, you don't 2.0 know how many have set off. You don't know how many 21 you're looking for. You are trying to piece -- and with 2.2 no air assets, apart from the helicopter doing its 23 search, you're -- you are trying to work out from all 24 that what how many incidents you have actually got. 25 So you don't know how many have set off. It's not 166

1 like you've set off on a cruise from one location to 2 another where you know it starts at this time and 3 finishes this time. So you don't know how many you are 4 looking for really because you don't know how many 5 started. You're getting multiple calls from multiple boats all saying that they are in a worse position than 6 7 they actually are, but they are treated as if they are 8 in a sinking position. 9 How they get correlated, how they get closed off, 10 etc, that's -- the SMC would do that. But as far as 11 I was aware, the boats we were looking for had been 12 found, but my view on it or opinion on it wasn't 13 relevant because I am in the part of -- the decision of 14 what had been found or not was a matter for the SMC, not 15 for a MOO 16 Q. But in terms of your state of mind, your -- your belief 17 at the end of the night watch, did you believe that 18 those on board Charlie, the Jonas call, for example, had 19 he exaggerated their level of distress and in fact they were not sinking, whereas they said they were? 20 21 A. My belief was that we'd recovered and rescued everybody 22 that we had gone to look for or were looking for. As

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level of distress that they were in, so I had nothing to

I say, it was normal that people would overstate the

tell me any different.

1	And I wasn't overseeing directly the actual
2	resources. Sorry, I can't $$ as far as I was aware, we
3	had managed throughout the busyness of the night, etc,
4	to recover and rescue everybody that we thought we were
5	looking for . We didn't know $$ I didn't know $$
6	I wasn't aware. I thought we had managed, actually, to
7	achieve success all round and had recovered everybody,
8	because we were trying to find everybody.
9	The questions and resources, etc, are $$ we worked
10	very hard to try and resolve this . It's $$ being in
11	a small boat in the English Channel is going to be in
12	a difficult position, so actually trying to (inaudible)
13	is something you are trying to resolve. No matter what
14	the state people said the boat was in, you still would
15	try to resource it and rescue it . It wasn't a case of,
16	"Oh, no, it is going to be better than they said, so we
17	won't". No, everybody is trying to rescue and do the
18	recovery.
19	So $$ and as far as I was aware, that night $$
20	again, you don't know how many have set off, so you
21	don't actually know how many to account for. It's not
22	like it's $$ I don't know. Somebody hasn't given you
23	a list of: these are the people that have started off.
24	You've got to find people. You don't know how many you

- 1 Q. But if you sent out a helicopter and a helicopter -- to
- 2 look perhaps for a sinking small boat and the helicopter
- 3 didn't find it, you might assume, with the history of
- 4 what you knew about exaggeration, that actually perhaps
- 5 it wasn't sinking in the first place.
- A. If it was sinking, you'd be finding debris or -- etc,
   but the search pattern, the -- the assignment of the
- 8 rescue helicopter to the incident and a search pattern
- 9 that's matching the SMC and the Rescue 163 crew, exactly
- 10 what they thought, what they found, etc, that
- $11 \hfill \hfi$
- 12 involved in. That's something that the SMC would do.
- 13 It's not a MOO's task
- 14 Q. Before the break, you talked about those on board small15 boats being coached or told to exaggerate their
- $16 \qquad \mbox{ situation }. \mbox{ Did you and others at Dover ever consider }$
- $17\,$   $\,$  that those on board, not being mariners, in
- $18\,$   $\,$  an inherently perilous situation , given the nature of
- 19 the small boats, may have genuinely believed themselves
- 20 to be in grave danger perhaps more than objectively was 21 the case?
- A. Yes, you are going to be in a difficult position, but tosay the boat's sinking or there's pregnant people on
- $24\,$  board and they are actually giving birth now, when you
- 25 get there and it's a boat full of males, clearly that's

- $1 \qquad \mbox{ an exaggeration. So yes, there were exaggerations, but, }$
- 2 you know, claiming -- the lady that I mentioned earlier
- 3 where they said, "Oh, she's unconscious, I' II talk to
- 4 her", well, she's clearly not unconscious then.
- 5 So yes, it's going to be a difficult position. It
- 6 would be very unpleasant, and that's obviously why 7 HM Coastguard classified vessels as being in distress
- 7 HM Coastguard classified vessels as being in distress .
- 8 But when you have got, as I say, reports of pregnant 9 people actually giving birth at the time people
- 9 people, people actually giving birth at the time, people 10 unconscious or with various injuries , and you get there
- 10 unconscious or with various injuries , and you get there 11 and actually that's not the case, so clearly there
- 11and actually that's not the case, so clearly there12were -- some of the calls were exaggerated.
- Q. Were you involved in any handover to the day watch on
   24 November?
- 15 A. No, that would be the SMC to SMC.
- Q. Do you recall whether Neal Gibson or anyone at Dover
   gave a handover to Richard Cockerill when he started his
- 18 shift at 5.00 am?
- 19 A. I don't recall that, no.
- 20 MS MOFFATT: Thank you, Mr Downs. I don't have any further
- 21 questions for you.
- 22 Sir, I don't know if you have any.
- 23 Questions by SIR ROSS CRANSTON
- 24 SIR ROSS CRANSTON: Mr Downs, you mentioned earlier in the
- 25 evidence about this leaflet you saw --

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- 1 A. Yes SIR ROSS CRANSTON: -- with the figures drawn and so on. 2 3 You don't have that any more? A. I don't, sorry, no. I don't know who -- I saw it at 4 Dover Coastguard. Who had it where it came from, 5 I'm not sighted on, sorry. 6 SIR ROSS CRANSTON: No, okay. Well, Mr Downs, thanks very 7 much for your evidence. It has been very helpful, so 8 9 thank you very much indeed. 10 We will have a break and then we will have 11 Mr Cockerill. 12 (The witness withdrew) 13 (2.52 pm) 14 (A short break) 15 (3.03 pm) SIR ROSS CRANSTON: Mr Cockerill, good afternoon. Mr Davies 16 17 has got some questions for you, but could you firstly 18 read out the affirmation? MR RICHARD COCKERILL (affirmed) 19 20 SIR ROSS CRANSTON: Yes, thank you. 21 Mr Davies 22 Questions by MR DAVIES 23 MR DAVIES: Mr Cockerill, could you start please by
- 24 repeating your full name for the transcript?
- 25 A. Richard Michael William Cockerill.

## 171

- 1 Q. Thank you.
- 2 Thank you, Mr Cockerill, for coming to assist the
- 3 Inquiry today and thank you for providing a witness
- 4 statement running to, I believe, 34 pages and signed by
  - you, I think, on 31 October 2024; is that right?
- 6 A. Correct.

5

- 7~ ~ Q. I want to start, please, by asking you a few questions
- 8 about your career in the coastguard and your
- 9 qualifications , if I may.
- 10 A. Okay.
- 11 Q. So starting with when you joined the coastguard,
- 12 His Majesty's Coastguard, 2012 I believe that was, and
- 13 you joined as a coastguard watch assistant.
- 14 A. Correct.
- 15 Q. Am I right in thinking that's not a position which
- 16 exists today?
- 17 A. Correct.
- 18 Q. And has since -- it is described -- correct me -- as
- 19 an entry level position.
- 20 A. Correct.
- 21~ Q. But since then, you have progressed through the ranks of
- 22 the coastguard, taking the level of senior maritime
- 23 operations officer in 2016; is that right?
- 24 A. Correct.
- 25 Q. And you obtained your SMC qualification shortly

March 13, 2025

1

1 thereafter in around May 2017.

- A. I can't remember the exact date, but that sounds about
   right, yes.
- 4 Q. And, finally, you were promoted to your current position 5 of team leader in June 2021; is that right?
- 6 A. Correct.
- Q. And on the night of the events the Inquiry is looking
   into, you were a leader of a team at the JRCC in
- 9 Fareham; is that right?
- 10 A. Yes.
- 11  $\,$  Q. Now, could I just ask you, please, the difference
- 12 \$\$between the team leader position and the SMC role? Am <math display="inline">\$
- 13  $\hfill I$  right in thinking the team leader is a pastoral line
- 14 management position whereas the SMC is a qualification
- 15 and an operational role in a search and rescue mission?
- 16 A. That's correct, yes.
- 17 Q. Is that a fair summary?
- 18 A. Yes.
- 19 Q. Thank you.
- 20 And looking at that distinction , if you are in work
- 21  $\hfill at the JRCC, are you always the SMC, if you are in, or$
- 22 could you be the team leader, but doing administrative
- 23  $% \left( {{\left( {{{\rm{max}}} \right)}_{\rm{max}}} \right)$  functions, for example, or something of that nature when
- 24
   someone else of equivalent rank would be the SMC?

   25
   A. Correct. An SMC could be done by -- or is
  - 173
- 1 a qualification that could be gained by a senior
- 2 maritime operations officer , which is a role below
- $3\,$  a team leader, and the team leader is, as you say,
- $4 \qquad \ \ \, \text{a} \ \ \, \text{line} \ \ \, \text{management role, and we wouldn't always assume}$
- 5 the role of an SMC on a watch. It would be done by
- 6 different people at different times to -- to ensure that
- 7 they can maintain their competencies.
- 8 Q. Thank you.
- 9 And when you qualified as an SMC, were you given any 10 specific training in relation to small boats search and
- 11 rescue?
- 12 A. At the time I qualified , no.
- 13 Q. And am I right in thinking you are required by
- 14 His Majesty's Coastguard to re-validate that
- 15 qualification every five years?
- 16 A. Correct.
- 17~ Q. And am I right in thinking you re–validated your SMC
- 18 qualification in around March 2023?
- 19 A. That would sound about right, yes.
- Q. When you did that re-validation exercise, were you then
   provided any specific training in relation to small
   boats search and rescue?
- 22 boats search and rescue?
- 25 Q. What are the differences, please?

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2 competency to be able to manage a search and rescue 3 operation and your ability to search and plan 4 appropriately. There is no wider learning, as far as 5 I can remember, with regards to refresher things. The small boats training is more an ongoing process. 6 7 Q. I see 8 Thinking more generally, what formal search and 9 rescue training in relation to small boats did members 10 of the JRCC receive? 11 A. The specific training would be through the production of 12 Standard Operating Procedures and updates using the 13 coastguard information portal, known as "hot topics". 14 That's the training that we have received 15 Q. Do you recall ever receiving a presentation or something 16 of that sort around August/September 2021? 17 A. Not that I can recall. 18 Q. Okay. Thank you. Thinking now about the relationship between the JRCC 19 20 and MRCC Dover, please, I am right in thinking the JRCC 21 is the default zone flexing station for the entire 22 coastguard network; is that right? 23 A. Correct. 24 Q

A. It -- the re-validation process is looking at your

Q. And that would apply to MRCC Dover as much as any otherMRCC.

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- 1 A. Correct.
- 2 Q. Now, in terms of the support that can be provided as
- 3 part of the zone flexing function, is it just SMC
- 4 support that can be provided remotely or, for example,
- 5 could a SMOO or a MOO operate remotely and controlled by 6 an SMC somewhere else?
- 7 A. Yes. So the support that can be provided can be anything from monitoring an individual channel, such as
- 9 channel 16, right all the way up to actually taking10 an entire station offline and it being managed remotely.
- Q. And thinking about your experience at the JRCC, across
   2021, how frequently were the JRCC being asked to cover
   remotely for MRCC Dover, that you can recall?
- 14 A. It certainly happened. I can't remember as to how
- 15 frequently, but it was certainly something that was not 16 uncommon.
- 17~ Q. And in relation to that cover, are you able to assist
- 18 the Inquiry with how much of it related -- or indirectly 19 or directly related to small boats?
- or directly related to small boats?A. The remote assistance that was offer
- A. The remote assistance that was offered would normally
   have been to take their default SAR zones. The small
- boats would then be done specifically by the operatorsat Dover.
- 23 at Dove
- 24 Q. Did coastguard officers at the JRCC notice any change to 25 their working patterns as a result of the increase in

their working patterns as a result of the increase in

- 1 small boat crossings?
- A. Sorry, did the operators at the JRCC --2
- 3 Q. Yes. For example, were you being asked to cover so much
- 4 that it affected your work patterns at the JRCC?
- 5 A. I think because we were the default for the network, we
- were used to taking additional functions, additional 6
- 7 zones on a regular basis from the network, so it didn't
- 8 really have an impact on us, I don't think.
- 9 Q. And in your view, was the zone flexing system 10 an effective way of providing cover to MRCC Dover in
- 11 relation to small boats?
- 12 A. I think the way the network operates, yes, it is
- 13 effective. It does what it's designed to do
- 14 Q. The Inquiry has heard a lot of evidence about how
- 15 important it is to be in the room and the information 16 that's communicated orally between those involved in 17 a search and rescue mission.
- 18 A Yes
- 19
- Q. Do you think that's a possible limitation of remote 20 cover; that your -- that the SMC might not be part of
- 21 that dynamic, if I can put it that way?
- 2.2 A. Being a remote SMC does have its challenges. It is
- 23 certainly more difficult to maintain overall situational 24
- awareness being remote. That's not to say it doesn't 25
  - work. It can be effective, but it's no substitute for

- 1 actually being there.
- $\mathsf{Q}.~$  If  $\mathsf{I}$  could just explore with you some of those 2
- 3 challenges. What do you think they are, in terms of 4 your answer previously?
- A. I think being there, you pick up on phone calls, radio 5 6 communications that, being remote, obviously you are not 7 privileged to. So you tend to lose the feel of what's
- 8 actually happening in the room. You are relying on
- 9 being told information rather than actually hearing it 10 vourself firsthand.
- 11 Q. So if something -- you may perhaps, for example, lose 12 a sense of urgency of a particular phone call, for 13 example, if you were remote that someone else had taken, 14 for example.
- 15 A. You could do. ves.
- 16 Q. I want to ask you now, please, about the migrant admin 17 ViSION log. That is {INQ000235/1}, please, if we could 18 just bring that up. This is a document which you are
- 19 familiar with. Am I right in thinking that?
- 20 A. Correct.
- 21 Q. And this is where I believe, and correct me if I am 2.2 wrong, incidents, small boats incidents, which were
- 23 unable to be attributed at the moment they were
- 24 received, the details of those incidents were placed
- 25 into this log rather than, for example, a log with

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- 1 an alphanumeric reference number; is that right?
- 2 Α. Yes
- 3 Q. And could we please next bring up your statement at
- 4 {INQ009634/19}, please. You describe at paragraph (f),
- 5 subparagraph (f) there, that you wouldn't typically
- access information in the admin log if you were acting 6
- 7 as an SMC. 8 Was that your own practice or was that something
- 9 that was recognised across the coastguard -- the SMC
- 10 function across His Majesty's Coastguard to be the
- 11 appropriate way to treat this migrant admin log?
- 12 Α I think the contents of what goes in the administration 13 log you would be told about verbally. So as an SMC, you
- 14 would -- I would hope that I was being told everything
- 15 that is being put in that log verbally. The purpose of
- 16 that is to record it as well, so that there is a written
- 17 record of it. But as an SMC, it's not something, as
- 18 I say, that you would access regularly because you
- 19 would -- I would hope that the information that's going
- 20 in there would have been told to me by another means.
- 21 Q. So when you say "verbally", thinking about your position
- at the JRCC --22

A. Yes

A. Yes. 23

25

24 Q – remote from MRCC Dover – –

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- 1 Q. -- how do you mean "verbally"? A. So if I was remote SMC at the JRCC, I would use what we 2 3 call a TalkBox, which is an internal communications 4 method using the coastguard communications system, and 5 I would be in regular verbal contact with whoever was in 6 the room. And if I was operating remotely, it may be 7 something that I would look at more frequently, but if 8 I was actually within the room, then I would expect to 9 be told it verbally. I think a lot of it depends on 10 where you are based. If you are within the room, 11 obviously you are party to the conversations, but 12 remotely, it is probably something that you would more 13 look at frequently. Q. I understand. Thank you. 14 15 I want to talk to you now about the provision of 16 cover to MRCC Dover that you gave prior to 23 and 17 24 November 2021. I would like to start with first your 18 understanding of what the staffing situation was at 19 MRCC Dover. Did you have any sense of that prior to the 2.0 events of 23 and 24 November? 21 A. I think MRCC Dover had its challenges in maintaining 2.2 suitable staff numbers, which was borne out by the 23 amount of support that was offered and given throughout 2.4
- the course of the year, be it a lone operator or two. 25
- I think things were starting to increase, were starting

- 1 to get better.
- 2 Q. How did you become aware of those difficulties, if you
- don't mind my asking? Was it through colleagues? Wordof mouth?
- 5 A. I mean, the way the national network works is that we
- 6 would be asked by the network commanders to offer Dover 7 assistance or to take a zone off of them and add it to
- assistance or to take a zone off of them and add it toour usual zones. That generally is how we were aware of
- 9 it.
- 10~ Q. So an increase in frequency of being asked to offer
- 11 support to MRCC Dover?
- 12 A. Correct.
- 13 Q. Could we bring up please {INQ000233/10}. This is the
- 14network management log for the 24 November 2021. Can we15just move to the bottom of the page, the very last
- 16 entry, it looks like it's cut off. There we are. You
- 17 can see your name at the bottom there and you are
- 18 referred to in this log as: Op Deveran support.
- Could you help the Inquiry, please, with what was
   Operation Deveran support?
- A. Operation Deveran was the -- was what was used to
- describe small boat activity. The Op Deveran support
- was me being present at MRCC Dover in person for
- 24 a period of time to observe and learn firsthand how it
- 25 was dealt with within the ops room in MRCC Dover.

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- Q. I see. Could we bring up, please, {INQ000409/1}. It's 1 a spreadsheet so I think we will need the native 2 3 version, please. As we see at the top left there this 4 is the Dover watch bill. Could we please go to row 85 5 of this spreadsheet? Thank you. 6 Now, your name appears there with your colleague at 7 the JRCC Tom Barnett as red days. Was red days here the same thing as Operation 8 9 Deveran support? Was it referred to as red days as well 10 as Operation Deveran? 11 A. Sorry, which, which red days are we referring to? 12 Q. Forgive me. It's row 83 just by the cursor there? 13 A. Okav. Q. Just above your name. Was your Operation Deveran 14 15 support role ever colloquially referred to or otherwise 16 as red day support? 17 A. Not that I'm aware of. 18 Q. Okay. So could we move in the spreadsheet, please, to 19 column "WQ", please. Thank you. This appears to be the 2.0 first day on which this red day support was provided. 21 Was this a time when you were at MRCC Dover in person? 2.2 A. No, that would have probably been when I was present at 23 the JRCC.
- 24 Q. Okay. Perhaps just taking a step back. How would one25 be selected to provide Operation Deveran support?
  - 182

day to see if we had a suitable number of SMCs and who
in the network would be available. Dover support
primarily came from the JRCC and MRCC Humber, so they
would look to free up an SMC at the JRCC or Humber to be
able to provide SMC assistance to Dover if it was an SMC
in particular that they required.
Q. Yes. We can see it on the left—hand side of the screen

A. It would be determined by the network commanders on the

- 9 there that in fact there is a range of qualifications,
- 10 MOOs and SMOOs, etc.
- 11 So on this first day that it appears this support
- 12 was being provided -- well, first of all, does the
- 13
   September dates that we see here accord with your

   14
   recollection of when you first started providing support
- 15 to MRCC Dover?
- 16 A. I'm afraid I can't recall that.
- 17 Q. Can you roughly remember when, when it started in your18 career?
- 19 A. It -- it was in 2021 is, is the most I can narrow it
- 20 down to I'm afraid.
- 21~ Q. Okay. Well, let's just stick with this spreadsheet for
- 22 the moment. It seems to record your attendance or your
- 23 cover rather to MRCC Dover. You don't recall the first24 day that we see here that's highlighted?
- 2.5 A. I'm afraid not.

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- Q. If we scroll along, please, if we could highlight row  $85\,$ 1 2 so we can see Mr Cockerill's days and just scroll along, 3 please, until we come to the next entry. 4 There we are. We see another entry there 5 25 September -- 26 September rather, 27 September again 6 please onwards and then on the 9 October and finally can 7 we move forward please to the 22 November. 8 There is a little bit of a gap here which we will 9 come to. So this period of time is where you were 10 stationed at MRCC Dover --11 A. Correct 12 Q. -- around the time of the events with which the Inquiry 13 is concerned. 14 Prior to this period, we can see that you were 15 providing this cover to MRCC Dover on five occasions. 16 Does that accord with your recollection of the amount of 17 cover you provided; there was perhaps a handful of times 18 before you eventually --19 A. Yes, it would 20 Q. Do you see that? 21 A. It would be about right, yes. 2.2 Q. I gather from your statement that you provided to the
- 23 Inquiry this was the first time, 22 November that you
- 24 had been there in person, is that right?
  - A. That I recall, yes.

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1

- 1 Q. That you recall, okay. You may be able to help with
- 2 this, but you may not. Could we just go back please to
  - the beginning of the spreadsheet, well, to the September
- 4 dates we were looking at previously.
- 5 Perfect. Most of these entries are day entries
- 6 apart from the four nightshifts we see here, not for
- 7 you. Are you able to assist with why most of the red
- 8 day cover that was provided to MRCC Dover was during the
- $9 \qquad \ \ \, day$  when the Inquiry has heard quite a lot about calls
- $10 \qquad \ \ \, \mbox{which were coming through in the early hours of the}$
- 11 morning and would be covered by a night shift. So, why 12 were they day shifts please?
- 13 A. I would say predominantly the reason would be because
- 14 the boats would leave the shore under cover of darkness
- 15 with a view to arriving into the middle of the English
- 16 Channel for about daybreak or just after. So most
- 17 support was required for when UK assets were actually 18 going to be engaged in operations.
- 19 Q. I see. So the focus was on supporting the operation of
- assets rather than the call collection phases perhaps,is that fair?
- A. I think it would depend on the assessment as to how busyit was expected to be.
- 24 Q. So prior to the first time you provided this cover, were
  - you given any training about what to expect at

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1 MRCC Dover?

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- A. I wasn't given any specific training that I can recall.
   That was one of the reasons for my attendance at Dover,
- 4 was to gain experience and understand how it was
- happening. Most or all of the support prior to that had
   been as a remote SMC that I can recall.
- Q. And can you help us with this please. How did it come
  to be that you were going to be there in person? Did
- 9 you volunteer?
- $10 \quad \text{A. I requested it, yes.}$
- 11~ Q. You requested it. Why? Why?
- 12 A. To help me get a better understanding of the types of 13 calls that were received, how they were taken and as
- 14 a remote SMC, as I stated earlier, you miss a lot of the
- 15 conversations that happen in the room and a feel for it.
- 16 So my attendance at MRCC Dover was to provide me with
- 17 that understanding of the types of phone calls you get,
- 18 how often they are which you don't always understand as
- a remote SMC.
- 20~ Q. So this was something you requested of your own
- 21 initiative . Were you encouraged to do it by those above 22 you or was this something which was suggested to you to
- you or was this something which was suggested to you tobe a good idea or was it your own idea that you wanted
- 24 to do this?
- 25 A. I can't -- I can't recall. The idea of me going was

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2 remember specifically whether it was something that 3 I was directed to do, but it was something that 4 I certainly volunteered to do. Q. I understand. Thank you. So can we go to 5  $\{INQ006233/1\}$ , please. This is a request for overtime 6 7 at MRCC Dover that went out I believe on a wide 8 circulation, all stations, requesting support for the 9 week with which the events took place. 10 Am I right in thinking, based on what you have told 11 us today, that your presentation at Dover had nothing to 12 do with this request for overtime, your physical 13 presence at Dover I should say -- we will come to the 14 time you started in a moment -- but your physical 15 presence was nothing to do with this request for 16 overtime. You were going to be there in any event? 17 A. I was going to be there whether this -- yes. 18 Q. This was preplanned since when? 19 A. I can't remember the timescale that it was preplanned. 20 but it certainly will have been a few weeks beforehand. 21 Q. Do you recall personally seeing this email at the time? 22 A. I - ves, I am aware of the email. 23 Q. And when you saw the email, what action did you take, if 24 anv? 25 A. When this email came out, this is when I discussed the 187 1 ability to start earlier to assist night shift. As

certainly not put off. It was encouraged. I can't

- I said earlier, the vast majority of the work, the help that was required, was during the day shift which is why that particular week I was working four days in a row.
- 5 If I had have worked the night shift it would have 6 been for a period of 12 hours which would have taken me 7 out of 24 hours of day shift work. So I suggested
- 8 a 5:5 to help assist the night shift at the end of the
- 9 night and then be around to assist the day shift for the
- 10 majority of the day.
- $11 \quad \mbox{Q}. \label{eq:Q}$  Around that daybreak period that you referenced earlier.
- 12 A. Yes

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3

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- 13~ Q. You mentioned discussing this email. Who did you
- 14 discuss it with, please?
- 15 A. I can't remember who exactly it was I discussed it with.
- 16 Q. Might it have been the small boat tactical commander 17 George Papadopoulos?
- 18~ A. It could have been. It might have even been Duncan Ley,
- 19 it might have been the originator of the email himself.
- 20 But I can't remember specifically who it was, but it was
- 21 agreed.
- Q. During that discussion, did the person who you spoke toabout it tell you anything about the red day forecast,
- for example that had happened on the 22 November, that
- 25 it was going to be a busy period at Dover?
  - it was going to be a busy period at Dover?

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- 1 A. My recollection is that when I started on the Monday, we
- were aware that it was going to be a challenging week. 2
- 3 The actual numbers was unknown but we were aware that it
- 4 was amber and red days, yes.
- Q. Could we please go back to the spreadsheet {INQ000409}, 5
- please. Thank you. Can we go to the November dates, please, 22 November, please.
- 8 We can see two comments on the boxes of the 23rd and
- 9 24th. Could you just hover the cursor over the first
- 10 box on the 23rd please, the red dot, or expand it so we
- 11 can see the comment, thank you.
- 12 So this is a comment as you indicated, early finish
- on the 23rd to allow enough rest before a 5 o'clock 13
- 14 start shift on Wednesday.
- 15 A. (Nods)
- Q. As part of the discussion -- you received this on the 16
- 22nd you worked the day shift. Was there any discussion 17
- 18 of skipping the following day shift and then working the
- 19 night of the 23rd rather than simply starting early and
- 20 working day shifts if you understand my meaning?
- 21 A. Not that I can recall, no.
- 2.2 Q. Okay. And was it your suggestion to start early or was 23 it something that was suggested to you?
- 24 A. I think it was my suggestion, if I remember correctly.
  - Q. If we can take that off the screen, please. Thank you.

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1		Can we bring up your statement, ${INQ009634/13}$ ,
2		paragraph 28. You explain what your role was at
3		MRCC Dover in that paragraph. You say you attended in
4		an observational capacity supporting/observational
5		capacity as a maritime co-ordinator, which is
6		essentially the same function as a MOO.
7		Why are you referred to, if you can assist with
8		this, please, as a maritime co $-$ ordinator rather than
9		a MOO? What attracts that different title?
10	Α.	The maritime co-ordinator is also referred to as
11		a mission co-ordinator. Again it's a lower
12		qualification to the SMC, but the maritime co-ordinator
13		was part of my role, the vast majority of my role on the
14		days there was exactly to $\operatorname{co-ordinate}$ assets, which is
15		essentially what I was doing.
16	Q.	If I could put it another way. So how is it different
17		to a MOO and why does it have a different name?
18	Α.	I suppose it's used to differentiate because I am a team
19		leader, so it's to differentiate that I am not a MOO,
20		I am a team leader. But at that time, I was not
21		operating in the capacity as a team leader, but as
22		a co-ordinator.
23	Q.	You go on to say in paragraph 29 that neither
24		Neal Gibson or James Crane took a break and so you
25		successful and the manufale environment black some entities and

25 weren't required to provide cover. Had you anticipated

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- 1 perhaps providing cover to them? A. It -- it was a possibility. If it would have happened, 2 3 it meant that I was suitably qualified to cover their breaks. As it is, they didn't and so I wasn't required 4 5 to. Q. So, in principle, even though you were there in 6 7 an observational capacity you could have if need 8 required act as SMC? 9 A. Correct. 10  $\mathsf{Q}.\;$  Did you act as an SMC at any point during your shift? 11 A. No. Could we bring up, please, {INQ000258/1}, please. This 12 Q. 13 is incident Tango. Could we go to {INQ000258/5}, 14 please. The reason that I want to take you to this, 15 it's because we can see an entry midway down the page 16 here from George Close at 11 minutes past 10 in the 17 morning and he conducts a RAGs assessment, which the 18 Inquiry has heard about, and refers to you as the SMC in 19 relation to that exercise.
- 20 Can you help us, please, with why he considered you
- 21 to be the SMC at this point or in relation to this
- 22 particular entry?
- 23 A. The only reason, the only thing I can suggest for what
- 24 is because I worked closely with George Close at the
- 25 JRCC and that's the role that he was familiar in which

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1		I operated. So that's the only reason I can think
2		because we did have a conversation that day on the
3		telephone. I can only assume that that was
4		an assumption on his part.
5	Q.	Can we go to $\{INQ000235/1\}$ , please, which is the admin
6		log we have previously seen, and at ${INQ000235/13}$ ,
7		please. We can see an entry from you at 9.31, an SMC
8		comment. Why does it appear as an SMC comment in
9		relation to your name when you weren't acting as the
10		SMC? Are you able to help with that, please?
11	Α.	I can only assume that that's an error on my part in
12		that I was used to putting SMC comments in incidents,
13		and working at pace I can only assume that I've actually
14		misused the wrong, the wrong tag for it.
15	Q.	Would you consider an entry like that to possibly
16		confuse
17	Α.	I can.
18	Q.	someone?
19	Α.	I can understand how it may be confusing, yes.
20	Q.	And can we go back to your statement please at
21		paragraph 51, {INQ009634/29}. Thank you. Sorry, it's
22		actually paragraph, yes, the end of paragraph 51:
23		"The closure of an incident requires authority from
24		a SMC. As explained earlier in my statement"
25		You go on to say:

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2

- 1 "I cannot recall if I had a conversation with
- 2 James Crane in relation to the closure of
- 3 Incident Alpha 1 as a repeat or whether I authorised
- 4 myself as SMC to close this incident."
- 5 So even though you weren't the SMC, you appear to
- $6\,$  have acted with the authority of an SMC. Was that
- 7 something that would happen if you had that
- 8 qualification ?
- 9 A. Looking at that entry, I can't remember the specifics of10 it which is why I was unsure as to how it was closed.
- 11 But I think the incident that I closed I would have
- 12 informed the SMC about that incident and sought his
- 13 authorisation for it to be closed.
- 14 Q. There was only one dedicated SMC if I could put it that15 way.
- 16 A. Mm-hm.
- 17 Q. And you were there in an observational capacity.
- although SMC qualified. Why not have two SMCs? Why not
   have James Crane or Neal Gibson and you dividing up the
   work in the ops room? Why is that not possible or was
- 21 it possible?

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- 22 A. Usually where you have multiple operations in different
- 23 parts of the country yes, it would be sensible for -- to
- have a different SMC for each incident. However, the
  - small boats is multiple events of one incident, so to

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- 1 maintain that situational awareness it does help to have 2 one SMC in charge of them all. 3 Q. So the particular challenge of small boats, is that what 4 you are saying, means it is beneficial to have one 5 person with oversight of everything that's happening? A. Yes. Due to the number of incidents that can be 6 7 created, it helps if you have that overall situational 8 awareness if you have just the one person in charge 9 making the decisions. 10 Q. I want to talk to you now about the events immediately 11 prior to your watch on 24 November. We have seen the 12 entry you can take the statement off screen, please. 13 We have seen the entry from George Papadopoulos on 14 the watch bill discussing your early start and early 15 finish the day before so that you were sufficiently 16 rested 17 You describe in your statement how 23 November was 18 a day which you worked at MRCC Dover? 19 A. Correct. 20  $\mathsf{Q}.\;$  And it was a busy shift, in your words. You say that 21 you worked 7 to 7 that day, is that something you recall 2.2 happening? 23 A. Yes 24 Q. And when you say it was a busy shift, do you mean it in 25 relation to small boats incidents or other work with
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3  $\mathsf{Q}.~\mathsf{If}~\mathsf{I}$  were to suggest to you that there were in fact no 4 small boats incidents on the 23rd of November, does that 5 accord with your recollection of what happened or can't you say one way or the other? 6 7 A. I can't remember. There's nothing that stands out 8 specifically about the 23rd. 9  $\mathsf{Q}.$  Is it possible that you are perhaps mistaken about the 10 level of activity on the 23rd or how busy your shift was 11 or do you remember that guite clearly? 12 A. I - I - I can't remember the level. I can't recollect 13 the level of work that was involved. It might not have 14 been relevant to small boats, but I -- there probably 15 would have possibly was other things going on. It might have been reviewing or discussing small boats activity . 16 17 I'm afraid I can't recollect. 18 Q. Okav. And are you certain that it was definitely a 7 until 7 shift on 23rd of November? 19 20 A. Having seen the entry, I can't recollect what time it 21 was I actually finished on the 23rd. 22 Q. Okay. And when you were about to start your shift on 23 the 24th, did you feel sufficiently rested and --24 A Yes 25 Q. -- able to take on what you were about to take on? 195

which MRCC Dover was concerned?

A. That, I'm afraid, I can't recollect .

- 1 Okay. I want to talk to you now about the moment 2 just before you entered the ops room at 5 am. 3 At that moment, before you walked through the door, 4 were you expecting to receive a handover from 5 Neal Gibson? 6 A. I wasn't expecting to receive a handover. That is 7 usually given when you change over a full watch shift. 8 I would have expected a brief of what was ongoing, if 9 there was anything ongoing, but not a full handover. 10 Q. When you say a "full handover" you mean a presentation, 11 a PowerPoint presentation? 12 A. Correct. 13 Q. Were you expected -- would you expect to, at that time, did you expect to have been told of something like 14 15 a Mayday that had been previously issued during the 16 shift? 17 A. If it was still ongoing, I would have expected to be 18 told. 19 Q. Any vessels or incidents in significant distress, would 2.0 you expect to have been told about that? 21 A. Yes. If they were in the process of an active SAR 2.2 operation, yes
- 23 Q. Had you -- have you previously, in your coastguard
- 24 career, begun a shift without a formal handover?
  - A. Not that I can recollect .

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1 Q. Did you have any reservations about beginning a 12-hour

- 2 shift without receiving a full handover?
- 3 A. No

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- Q. Why was that, please? 4
- 5 A. I - - in my experience, I would be guite comfortable to
- be able to pick up incidents as they are happening, if 6
- they are ongoing, to be able to read them and be able to
- 8 just carry on without a full handover.
- 9  $\mathsf{Q}.\;$  So turning to the night and the moment you enter the ops 10 room. What's the atmosphere like when you walk in?
- 11 A. My recollection is, is that it was guite calm, it was
- 12 quite relaxed. There was no immediate incidents going
- 13 on that required a vast amount of, of actions. There
- 14 was some ongoing incidents which were coming to
- 15 conclusion when I arrived in the ops room.
- Q. Could we bring up  $\{INQ006802/1\}$ , please. This is the 16
- 17 version of the tracker at 03:37 am, it is the tracker 18 that immediately preceded the start of your shift. The
- 19 next one occurs at 18 minutes past 5. 2.0
- We can see here there are eight open incidents. In 21
- your experience, was that a significant number of small 22 boats incidents to be outstanding when you started your
- 23 shift ?
- 24 A. It's not uncommon from my recollection.
- 25 Q. And thinking about the room and the team in the room, we

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- 1 have got these eight open incidents, a single SMC,
- Neal Gibson, a single MOO and a trainee MOO, and of 2
- 3 course yourself. And just to situate ourselves in the
- 4 chronology of what happened, R 163 is out on search and
- 5 rescue missions and the Valiant was tasked as well.
- 6 Other witnesses have impressed upon the Inquiry how 7 it was quite a busy night and does that accord with your
- 8 recollection at all?
- 9 A. As I say, when I went in, when I started my shift, the
- 10 Valiant was in the process of recovering three migrant 11 vessels and Rescue 163 was carrying out an observational
- 12 sweep and wasn't involved in, in active rescues at the 13 time. It was more a case of looking for migrant vessels
- 14 which we were unaware of.
- 15 Q. So you enter the operations room. The first thing you 16 do, what's that? Do you go to Neal Gibson first? Do 17 you go to your desk first and logon? Talk us through 18 your first moments in the operations room.
- 19
- A. The first thing to do would be to  $--\ensuremath{\mathsf{I}}$  did was find an 2.0 empty desk to log in to load up all the various pieces 21
- of software we require. Whilst those are loading. 2.2
- I would have expected to be told by Neal what I needed 23 to do to familiarise myself with what was ongoing at the 24
- time
- 25 Q. And what do you recall from that conversation?

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- 1 A. Unfortunately not very -- not a lot.
- 2 Q. Did he draw any particular incidents to your attention that you remember? 3
- 4 A. Not that I can recall.
- $\mathsf{Q}.\;$  And logging on and that business, how long would that 5 6 usually take you?
- 7 A. It takes a few minutes to -- for the various pieces of
- 8 software to come up and position them on screens, how
- 9 you feel comfortable with them. So two or three minutes
- 10 to organise your desktop.
- 11  $\mathsf{Q}.\;$  And then do you recall how long the conversation with
- 12 Neal Gibson last add at all?
- 13 Α. I'm afraid I don't, no
- Q. Could we bring up, please, {INQ000235/9}. I believe 14
- 15 this is the first ViSION log entry you make in what the
- 16 Inquiry has received. 18 minutes past 5, so starting
- 17 your shift at 5 and there being eight ongoing incidents.
- 18 You can't have spent any longer than 18 minutes 19 looking at them before you started getting about the
- 2.0
- business of recording things in KRAKEN. Is that 21
- something that sounds like your experience or do you 22
- think you spent longer going through ViSION logs or 23 preparing for what you were about to do over the next
- 24 12 hours?
- 25 A. I am not sure what the other people -- depending on what

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- 1 other people in the ops room were engaged in, I might 2 have taken that call because there was nobody else to do 3 it. I can't recall what happened between 5 o'clock and 4 5.18 I'm afraid. Q. When Neal Gibson asked you to familiarise yourself with 5 6 what was happening operationally, how did you do that? 7 A. It would have been a case of looking through the open
- incidents to read through to see which assets were 8 9 engaged in operations with which incidents and where
- 10 they were as well.
- 11  $\mathsf{Q}.\;$  This might sound like a silly question but  $\mathsf{I}$  am going to
- 12 ask it anyway. You wouldn't have checked any incidents
- 13 that would have been marked as closed to -- to
- 14 reassess ---15
  - A. No.
- 16 Q. -- them or look at the detail of them?
- 17 A. No.

25

- 18 MR DAVIES: No. Okay. Sir, it's been 45 minutes. Would it
- 19 be a convenient moment to have a short break, there is 2.0 not much longer?
- 21 SIR ROSS CRANSTON: How much do you think you have got?
- 2.2 MR DAVIES: 15, 20 minutes, I think.
- 23 SIR ROSS CRANSTON: Is that all right with the shorthand
- 2.4 writer, another 15 minutes? Is that all right with you,
  - Mr Cockerill? Okay, yes.

1	MR DAVIES: I am grateful.	1	Q.	My final question on this. We saw earlier how you
2	Could we turn to your statement please at	2		closed Incident Alpha 1 as a repeat and the unattributed
3	${INQ009634/1}$ , paragraphs 46 and 47, please,	3		incidents which come in are placed in this log. If you
4	{INQ009634/25}. Thank you.	4		hadn't read this log thoroughly as a call taker, which
5	This is the part of your statement where you discuss	5		you were acting as, would you not be at a disadvantage
6	how you weren't aware of the following, this entry, in	6		not having seen all the other information that had been
7	the migrant admin log from the maritime tactical	7		unattributed to marry these pieces of information up?
8	commanders.	8		Do you see my meaning?
9	Are you able to explain why you didn't see that if	9	Α.	Yes. At the time of ongoing incidents, looking for
10	you read the ViSION logs before you started your shift?	10		corroborating incidents to marry up with other open
11	A. Reading the ViSION logs would be reading the open	11		incidents would be low down on the priority list because
12	incidents. It wouldn't $$ I wouldn't have gone through	12		we would be dealing with live and SAR operations.
13	the admin log all the way back up to when it was opened.	13	Q.	I see. Thank you. I want to ask you now about your
14	At best, it would have been from the point at which	14		specific knowledge of Incident Charlie during the hours
15	I signed into the system. Review of the ViSION logs	15		of your shift . What was your understanding of that
16	would have been the actual open incidents that they were	16		incident when you started your shift?
17	engaged in operations at the time.	17	Α.	It was one of the ongoing incidents that Valiant was
18	Q. In your experience, were the messages of maritime	18		engaged with at the time I started my shift is my
19	tactical commanders known to you to be recorded in the	19		understanding.
20	admin log in this way?	20	Q.	And what was your understanding of Incident Charlie at
21	A. In my experience, the network commanders put comments in	21		the start of the day shift, for example, at 7 am?
22	the network management log rather than the admin log.	22	Α.	My understanding was it had been finalised with Valiant
23	That would be my experience. Having not done many small	23		recovering the vessels.
24	boats prior to November 2021, it's not something I am	24	Q.	Could we please bring up the tracker, $\{INQ006802\}$ again,
25	overly familiar with, with them putting comments in.	25		please. Did you review the tracker when you started
	201			203
1	Q. And no one specifically drew your attention to the	1		your shift or just the ViSION logs?
~		-		

- 2 concerns of the maritime tactical commander --
- 3 A. No, not that I am aware of.
- 4 Q. -- when you started your shift?
- 5 A. No.
- 6 Q. Okay. Given you hadn't received a proper handover, did 7 you not consider it more important to read all of the
- 8 available information on ViSION that you could see
- 9 rather than rely on the sort of summary Neal Gibson had 10 given you?
- A. I think my recollection is that because we had assets 11 12 out at the time, it was more important to familiarise 13 myself with the incidents that they were dealt with ---
- 14 dealing with immediately at that time. 15 Whilst that was ongoing. I don't recollect going
- 16 back through and looking at other things after the --
- 17 after I had familiarised myself with those events.
- 18 Q. With hindsight, should you have read this log in
- 19 a little bit more detail?
- A. If I was the SMC, probably. But the admin log is more 2.0 21 there to record things that are not attributable to
- 2.2 a specific incident. As an SMC you would probably be
- 23 aware of them, as I explained, from -- by other means
- 24 more often verbally. In hindsight yes, it probably 25
- would be a good idea to go back through and look at it.

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- ust the ViSION logs? 2 A. Not that I can recall. 3 Q. Okay. Sorry, could we bring up {INQ006802}. You see the entry "M957" against Incident Charlie. This is the version of the tracker that would have been available to 5 you? 7 A. (Nods). 8 Q. Did that have any impact on your understanding of the 9 status of Incident Charlie when you started the shift? 10 Α. If it's been allocated a M number, that would indicate that Border Force vessel has recovered the vessel. 12 Q. And to you oncoming, had you looked, had you seen this document you would have believed that the incident was closed? 15 A. Correct. 16 Q. The Inquiry has heard evidence about the belief within 17 His Majesty's Coastguard, members of His Majesty's Coastguard that calls from small boats exaggerated the
- 18
- 19 level of distress they were in. Is that your
- 2.0 understanding of the calls which come from small boats?
- 21 It is ves. Α.

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- 22 Q. What's the basis for that, please?
- During prosecution of incidents, comments had been made 23 Α.
- 2.4 with regards to various states of persons onboard those
- 25 vessels. Once those vessels had then been recovered by

- 1 UK assets the situations described onboard didn't match 2 what the SAR assets recovered when they arrived on 3 scene, for instance unconscious people or people in the 4 water. When they actually arrived on scene and started 5 to board them, there was no signs of distress or any persons in the water. 6 7 Q. The Inquiry has also heard about some of the issues with language barriers of call taking. Could we bring up 8 9 your statement, please, {INQ009634/32} at paragraph 60. 10 It's something you talk about here. You describe it as 11 one of the biggest challenges in relation to small boats 12 incidents. Could we go, please, to  $\{INQ010695/1\}$ . This is 13 a call that you took at 11.30 on the morning of the 14 15 24th. If we could scroll down, please, to the third 16 page, please, okay. So the male speaker of this call 17 says: France, no, please, please (inaudible). You say: 18 No. Male speaker: All you did please, please help
- 19 please. And then you say: This is not the police.
- 20 Is this an example of the kind of thing you are
- 21 talking about in your statement when you describe
- 22 language barriers?
- 23 A. Correct.
- 24  $\,$  Q. Clearly a misunderstanding here about what the caller  $\,$
- 25 has -- is saying?

- 1 A. (Nods)
- 2 Q. And were you aware at the time of any standard operating 3 procedure or guidance or training about how to deal with 4 an example such as this of a language issue? 5 A. Not that I can recall Q. And so you weren't familiar with the language line? 6 7 A. Yes, the language line is an option we have. However, 8 if I remember correctly, that is reliant upon having 9 a contact number to be able to call them back or keep 10 them on the phone. It can be quite a time-consuming process to establish which interpreter is required for 11 12 the language they are speaking. Q. Final topic. I want to talk to you about the closure of 13 ViSION log incidents. {INQ010349/1}, please, if we 14 15 could bring that up. 16 This was a message we can see at the bottom 17 originally from George Papadopoulos to James Crane and 18 it is a generic entry to be used in the ViSION logs 19 where there are limited -- which are unresolved 20 essentially at the time at the end of the shift . 21 If we scroll up, please, we can see that it's sent 2.2 to you at 5.41 in the evening of 24 November. 23 The first question about this document. Were you 24 still at work at 5.41? 25 A. I don't believe so, no.
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- 1 Q. Okay. Are you able to explain why this was sent to you 2 if you weren't still working? 3 A. I can't comment. No, I'm afraid not. 4 Q. Was there any discussion in the operations room that you recall before you left about the use of this statement? 5 6 A. Not that I can recall. 7 Q. Have you ever used this to close a ViSION log incident 8 and I say this because, having reviewed the incident 9 logs, there's no indication that you did in fact use 10 this? 11 A. No. I have no recollection of using that. 12 MR DAVIES: Those were the questions I had for you. 13 Mr Cockerill, thank you. Chair, do you have any further 14 questions 15 SIR ROSS CRANSTON: No, I don't thank so you very much indeed, Mr Cockerill. The evidence has been very 16 17 helpful. 18 Now, next, I know everyone is working at pace and 19 under pressure so I was discussing earlier with 2.0 Mr Phillips and Ms Le Fevre about next Wednesday and we 21 thought it better not to read out the statements but to 22 make them available on the website. You could perhaps 23 explain when we are going to do that, when we are in 24 a position to do that. 25 MS LE FEVRE: Yes, Chair, that will take place in the course 207 1 of the fourth week of our hearings in stages. So there 2 will be tranches probably on Tuesday and the Wednesday
  - 3 and the Thursday, the final three days of our hearings, 4 and we will publish the balance of the witness statement 5 evidence we hold in that fourth week. 6 SIR ROSS CRANSTON: Yes. We just thought it was, in terms 7 of preparing evidence and preparing the closings, it was 8 better to use the Wednesday that way. 9 So I hope that's acceptable. Is there anything more 10 about next week that we need to -11 MS LE FEVRE: No, thank you, chair. We just wanted to 12 confirm that the Inquiry won't sit on Wednesday. SIR ROSS CRANSTON: Yes, of course. Yes. Thanks very much 13 indeed and thanks again, Mr Cockerill. 14 15 (4.01 pm) 16 (The Inquiry adjourned until 10 o'clock, 17 on Monday, 17 March 2025) 18 19 2.0 21 2.2 23 24

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