HM Coastguard

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Captain Name
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Dear Name

Subject: Update on US Coast Guard SAR Case Study Recommendations

We would like to take this opportunity to provide you with an update on the actions which have been taken by His Majesty's Coastguard as a result of the US Coast Guard Search and Rescue (SAR) Case Study Review into the 24 November 2021 UK Small Boat Incident, and also provide an update on the now published UK Marine Accident Investigation Board report and their recommendations.

The following paragraphs are the HM Coastguard response to the US Coast Guard recommendations contained within the SAR case study:

Recommendation 1
Institute a bilateral (FR-UK) multi-agency task force that incorporates all stakeholder agencies to the specific maritime region of small boat migration.

This recommendation is not accepted.

HM Coastguard already has collaborative meetings and agreements in place with France. The MANCHEPLAN is the framework document, which is used by both nations, the foreword of the plan states:

"A large number of maritime incidents that may occur in the geographical area covered by MANCHEPLAN are likely to compromise both UK and French interests. France and the United Kingdom thus have a duty to plan for modes of cooperation and coordination with regard to intervention at sea.

Although each State will act according to its own regulations and procedures, France and the United Kingdom must cooperate effectively to ensure that the steps they take are as effective as possible."

The intention of the MANCHEPLAN is:

"Article 3 The purpose of the MANCHEPLAN

3.1 The purpose of the Anglo-French Joint Maritime Contingency Plan for the English Channel or MANCHEPLAN is to establish the policy and procedures for incident response management and co-operation in the event of an accident in the geographical sea area covered by the Plan."

Both Countries attend the Anglo-French Accident Technical Group (AFATG) biannual meetings to discuss activities captured in the ManchePlan.

In addition to AFATG meetings, there are regular bi-lateral strategic and tactical level operational meetings attended by both HM Coastguard and the French Coast Guard to discuss search and rescue operations in the English Channel. At these meetings if the agenda requires attendance from other agencies and government departments, they are also invited, such as Royal National Lifeboat Institution (RNLI), UK Border Force/Home Office, French lifeboat organisation. Meetings are held every month.

As a result of bi-lateral operational meetings the following actions have been agreed: Daily operational conversations between MRCC Gris-Nez and HM Coastguard; SAR Mission Coordination (SMC) to SMC conversations during small boat SAR operations; agreement to update and share trackers with incident information, between France and the UK; improved understanding of both UK and French SAR resources available to respond to small boat incidents in the English Channel

Recommendation 2
Develop a shared common operational picture with visual mapping to plot, share, and fuse known and suspected small boats and track and task response resources.

This recommendation is accepted in part.

Further technological solutions are in place and others are being explored by HM Coastguard. On 24 August 2022, HM Coastguard introduced MX Locate, a system which provided positional information for a casualty based on their phone's location. HM Coastguard has now also introduced a replacement to the MX Locate system, an ICU system on 18 April 2023 which enables text messages to be sent in English from HM Coastguard and are automatically translated to the language used by those on the small boat once selected, and vice versa. Plans to fit Artemis mobile phone system to SAR aircraft operating in the English Channel are being developed, which will enable HM Coastguard to be able to communicate with small boats in the UK search and rescue region even if they do not have a phone signal, this system will also provide position information. A date for implementation for roll-out around the UK is planned from 1 October 2024. The information obtained by HM Coastguard is shared with the French Coast Guard.

Recommendation 3
Develop a Mass Rescue Plan specifically tailored for the risk small boats present.

This recommendation has not been accepted. There are already plans in place to respond to multiple small boat incidents and multiple persons in the water from small boats. These plans are reviewed and updated when post incident feedback is received. There are also discussions as part of the monthly meetings on the SAR equipment which both the UK and France have available in the

English Channel to respond to small boat incidents, for example we are now utilising inflatable stairs to assist with recovery onto response vessels and reusable floating life rings.

Recommendation 4
As plans and standard operating procedures (SOPs) are revised, conduct UK MRCC to French MRCC level exercises that include stakeholders and liaisons. Additionally, functional exercises with vessels and crews that are called upon to assist in small boat operations can develop best practices and identify equipment to assist in such rescues.

Your recommendation is accepted and has been implemented. The bi-lateral operational meetings include the sharing of updates and changes made to any standard operating procedures. There has also been one multi-agency exercise with the RNLI, which included lifesaving apparatus and recovery of persons from the water.

Recommendation 5
Small boat notifications should initially be evaluated as in the distress phase. As additional information is gathered, the SMC should formally re-evaluate the emergency phase.

Your recommended measures formed part of HM Coastguard's policies and procedures before 24 November 2021. The process of incidents being initially classified in the distress phase and then re-evaluated by the SMC as more information is gathered is a procedure already in place by HM Coastguard and was applied to incidents on 24 November under HM Coastguard coordination.

Recommendation 6
Develop an affirmative criterion for closing or correlating cases.

Your recommended measures formed part of HM Coastguard's policies and procedures before 24 November 2021. An update to all staff has been issued on 23 December 2021 to reinforce this requirement when suspending or terminating the SAR incident.

Recommendation 7
Institute a deliberate process to include an authority above the SMC to objectively evaluate the information and actions prior to suspending a SAR case for unlocated persons or vessels. A similar process with articulatable factors should also be instituted for correlating multiple reports as a single incident.

Your recommended measures formed part of HM Coastguard's policies and procedures before 24 November 2021. HM Coastguard has a Tactical Commander, on-call Strategic commander and a Duty Operations Director, above the authority of the SMC. All escalation requirements are captured in the Coastguard Information Portal, including the trigger points for notification and escalation. There are also specific requirements for small boat incidents.

Recommendation 8
Develop standard procedures for shifting SMC to minimize the loss of situational awareness and ensure appropriate area and resource familiarity.

Your recommended measures formed part of HM Coastguard's policies and procedures before 24 November 2021.

Recommendation 9
Implement formal mental health and peer support networks to mitigate the fatigue and stress such cases can elicit.

Your recommended measures formed part of HM Coastguard's policies and procedures before 24 November 2021. HM Coastguard already had in place a programme for Traumatic Incident Management, (TRiM) enabling individuals and teams to access counselling and support services. Since the incident and receipt of the USCG recommendations, HM Coastguard has enhanced this process with the launch of the Distressing Incident Support Toolkit on 9 June 2023, to support individuals, teams and line managers to build resilience, to assist when responding to incidents and for post incident support.

Recommendation 11
SOPs or checklists should contain specific, prioritized questions that may decrease any ambiguities as to location, description, number of persons onboard, and nature of distress during an incident. These checklists should be shared with other entities that may receive calls from small boat Occupants.

Your recommendation has been accepted and has been implemented in full. HM Coastguard implemented a specific information gathering process (LINP) in December 2021. This has been reviewed and updated when feedback from operators is received, along with all other Standard operating procedures.

Recommendation 12
When the origination country of the migrants can reasonably be anticipated, consider requiring the use of on-call interpreters or a translation service to assist with collecting reports.

Your recommendation is accepted. Information regarding the nationalities of those onboard small boats is often not available prior to them making contact with the MRCC. There is usually a variety of nationalities onboard each small boat and these will vary for each incident coordinated. HM Coastguard had in place a language line service which provided a translation service 24/7. In addition to this HM Coastguard, introduced MX Locate on 24 August 2022 a system which provided positional information for a casualty based on their phone's location. HM Coastguard has now also introduced a replacement to the MX Locate system, an ICU system on 18 April 2023 which enables text messages to be sent in English from HM Coastguard and are automatically translated to the language used by those on the small boat once selected, and vice versa.

Recommendation 13
Continue seeking mobile phone location data capability and have access integrated into HM Coastguard console systems for continuous monitoring and case documentation.

Your recommendation is accepted and has been implemented in full. HM Coastguard has introduced an ICU system on 18 April 2023 which enables the location of a mobile phone to be provided automatically. The system is a web application, which records and retains all information, and it can be accessed across the national network and is now in operation in the English Channel.

Recommendation 14
Standard briefing templates and IAMSAR terminology can aid in ensuring all relevant

information is passed and provides a consistent brief for responders.

Your recommendation is accepted and has been implemented in full. HM Coastguard Standard operating procedures have been reviewed on 11 August 2022 and 18 March 2024 to ensure that the language used is consistent with International Aeronautical and Maritime Search and Rescue manual (IAMSAR) terminology. A reminder was also sent to all operational staff to ensure that appropriate language is used when requesting, tasking and briefing resources.

Recommendation 15
Watch officers must treat every distress alert as genuine until they determine otherwise. Supervisors must be alert to normalcy bias and take actions including regular training to counter the detrimental effects.

Your recommendation is accepted. Updates have been made to standard operating procedures to reinforce this requirement throughout the national network.

In addition to the US Coast Guard SAR case study review, the MAIB investigation into the incident is now completed and published with the following recommendations:

The Maritime and Coastguard Agency is recommended to:
2023/110 *Build on existing liaison with French authorities to devise a tracking and identification system that, to the greatest extent possible, removes the possibility of confusion and error when compiling an overview of small boats attempting the crossing.*

The Maritime and Coastguard Agency and UK Border Force are recommended to:
2023/111 *Develop procedures for achieving, as far as is practicable, an overview picture of migrant boat activity during periods when aerial surveillance is limited to rotary wing aircraft or is unavailable.*

The MCA has accepted both recommendations and are currently implementing measure to meet these requirements.

Should you have any questions on the above please do not hesitate to contact me, and I thank you once again for the assistance provided to the UK, by your teams in undertaking the SAR Case Study review.

Yours sincerely

Personal Data

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