

MCIB

Marine Casualty Investigation Board
Bord Imscrúdú Taisní Muirí



**REPORT INTO A
FATAL INCIDENT INVOLVING
A VESSEL OFF PORTRONAN,
CO. DONEGAL
ON THE
17th JULY 2018.**

**REPORT NO. MCIB/280
(No.9 OF 2020)**

The Marine Casualty Investigation Board (MCIB) examines and investigates all types of marine casualties to, or on board, Irish registered vessels worldwide and other vessels in Irish territorial waters and inland waterways.

The MCIB objective in investigating a marine casualty is to determine its circumstances and its causes with a view to making recommendations to the Minister of Transport for the avoidance of similar marine casualties in the future, thereby improving the safety of life at sea and inland waterways.

The MCIB is a non-prosecutorial body. We do not enforce laws or carry out prosecutions. It is not the purpose of an investigation carried out by the MCIB to apportion blame or fault.

The legislative framework for the operation of the MCIB, the reporting and investigating of marine casualties and the powers of MCIB investigators is set out in the Merchant Shipping (Investigation of Marine Casualties) Act, 2000.

In carrying out its functions the MCIB complies with the provisions of the International Maritime Organisation's Casualty Investigation Code and EU Directive 2009/18/EC governing the investigation of accidents in the maritime transport sector.



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Glossary of Abbreviations and Acronyms

ALB	All weather lifeboat
AML	Advanced mobile location
BT ECAS	British Telecom Emergency Call Answering Service
CE	Quality standard certification mark
CLI	Call location information
CoP	Code of Practice: The Safe Operation of Recreational Craft
CGU	Coast Guard Unit
CHP	Call handling procedures
DCCAE	Department of Communications, Climate Action & Energy
DCENR	Department of Communications, Energy & Natural Resources
DSC	Digital Selective Calling
DTTAS	Department of Transport, Tourism & Sport
ECAS	Emergency Call Answering Service
ES	Emergency Service
GRP	Glass reinforced Plastic
GPS	Global positioning system
hp	horse power
IRCG	Irish Coast Guard
Kt	knot (nautical mile per hour)
LB	Offshore lifeboat
LOA	Length overall
MHCG	Malin Head Coast Guard
MRCC	Marine Rescue Coordination Centre
MRSC	Marine Rescue Sub Centre
NM	Nautical mile
PST	Personal Survival Techniques (course)
SAR	Search and Rescue
SOLAS	Safety of Life at Sea
SOPs	Standard Operating Practices
SUPs	Support Procedures
VHF	Very High Frequency (radio)
WO	Watch Officer

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*The name of the Department, previously the Department of Transport, Tourism and Sport was changed to the Department of Transport with effect from the 17 September, 2020, S.I. No. 351 of 2020 refers.

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1. SUMMARY

- 1.1 On the 17th July 2018 at approximately 08:00 hrs. a recreational powerboat departed from Portronan, Co. Donegal with three persons on board. The vessel was allowed to drift whilst the crew were engaged in angling with rods. Approximately two hours later the engine was started but it quickly stopped and it could not be started again.
- 1.2 The vessel was anchored stern first whilst the crew attended to the engine. A wave washed over the stern flooding the boat and as the crew made an emergency call on a UK mobile phone a second wave washed over the stern and the boat foundered. While the emergency call was being put through by Emergency Call Answering Service (ECAS) to the Coast Guard (CG) the mobile phone fell into the water and there was no further contact with the crew.
- 1.3 The boat submerged to just below the surface, supported by air inside the cabin. Crewmember No.2 was wearing a personal floatation device (PFD) and drifted away from the boat. The Skipper and Crewmember No.1, without PFDs, clung to fenders on the side of the boat. Shortly afterwards the Skipper let go of the boat and drifted away face downwards.
- 1.4 Crewmember No.1 clung on to the boat for about 5 hours. When he saw a boat in the distance he began shouting and his shouts were heard by a person ashore and the Skipper of a boat, both of whom raised the alarm. Lifeboats, Search and Rescue (SAR) helicopter and Coast Guard Units were tasked. Crewmember No.1 who was clinging to the boat was picked up by a fishing boat and Crewmember No.2 who was wearing a PFD was rescued by the helicopter. The body of the Skipper was found on the shore about 1.5 km away. The crewmember rescued by helicopter was taken to Altnegalvin Hospital, Co Derry. He passed away later that evening.

All times have been standardised to Local Time.

2. FACTUAL INFORMATION

2.1 The vessel:

Type:	Fletcher Dorado Ski boat.
Builder:	Fletcher Boats UK.
LOA:	5.9 m / 19'04".
Breadth:	2.10 m / 6'10".
Depth at transom:	500 mm / 1'07" m.
Year:	Circa 1980.
Construction:	Glass Reinforced Plastic (GRP)
Engine:	Force 120hp petrol outboard.

The vessel was a 19 ft glass reinforced plastic (GRP) ski boat with a foredeck and cuddy forward, an open cockpit aft with wheel steering and engine controls on the starboard side. (See Photographs in Appendix 7.1).

2.2 Crew

Skipper, male in early 60's.

Crewmember 1, male mid 40's.

Crewmember 2, male mid-teens.

2.3 Code of Practice

The vessel was a recreational craft.

Code of Practice: 'The Safe Operation of Recreational Craft (2017)' ('CoP').

Note that the Code was updated in July 2019 to reflect the making of the Pleasure Craft (Personal Flotation Devices and Operation) (Safety) (Amendment) Regulations 2018 S.I. No. 400/2018 which amended S.I. 921 of 2005, the repeal of Council Directive 89/686/EEC as of 21 April 2018, and the substitution for Marine Notices 45 of 2012 and 10 of 2016 by Marine Notice 32 of 2019.

For the purposes of this report the changes do not alter any aspect that is under consideration in any substantial way. A copy of the changes to the 2017 CoP is attached at Appendix 7.19 and Marine Notice 32 of 2019 at Appendix 7.18.

The vessel was constructed before 1998 and the EU Recreational Craft Directive did not apply.

2.4 Safety Equipment

Three PFDs each rated at 100 newton buoyancy. Two were CE marked, standard EN395.

A third was not recovered. A grapple anchor and line.

2.5 Voyage Particulars:

An inshore voyage from Portronan towards Malin Head. (see Location Diagrams in Appendix 7.2).

2.6 Marine Incident Information

Type:	2 fatalities. A very serious marine casualty.
Date:	17th July 2018.
Time:	10:16 hrs.
Position:	Lat. 55° 22.3' N - Long. 007° 23.6 W. West side of Malin Head.
Wind Speed:	2 Beaufort - light breeze (4-6 kt) (see Appendix 7.3 Met Éireann Weather Report).
Wind direction:	West.
Sea state:	Moderate (1.25-2.5 m) Douglas.
Swell:	Low wave (0-2 m).
Visibility:	Good (5+ NM).
Air Temperature:	14.4°C.
Sea Temperature:	16.0°C.
Tide Information:	High Water 12.49 hrs. Instrahull (ATT) Low Water 19.19 hrs.
Range:	Neap tides.
Sunrise:	Approximately 05:13 hrs.

Sunset:	Approximately 21:56 hrs.
Boat Operation:	Pleasure Fishing.
Human factors:	Lack of preparation for emergency. Inadequate communication of emergency call by the Emergency Call Answering Service (ECAS) and the Coast Guard.
Equipment Factor:	Not wearing PFD. Not having a Very High Frequency (VHF) radio.
Consequences:	Vessel foundered. Loss of vessel and 2 Fatalities.

2.7 Shore Authority Involvement and emergency response

The shore authorities involved were the Irish Coast Guard and ECAS. The Irish Coast Guard is a division of the Department of Transport, Tourism and Sport and is the SAR Coordinator for maritime SAR in Ireland.

The Emergency Call Answering Service (ECAS) is the national Public Service Answering Point for calls to the Emergency Services. Following the introduction of the Communications Regulation (Amendment) Act of 2007, the Department of Communications, Energy and Natural Resources (DCENR) tendered for a supplier to provide the Emergency Call Answering Service (ECAS) for Ireland. On completion of this open tender process BT was awarded the contract (known as a Concession Agreement) to provide 112 and 999 call answering services on behalf of the State of Ireland.

2.8 Timelines of Emergency Response

10:16	Emergency 999 call to Malin Head CG via ECAS Navan.
10:20	Malin head CG phone call to ECAS Ballyshannon to ask for more details.
10:22	ECAS Navan to Malin Head CG phone call to confirm CG had the number of caller.
10:23	ECAS Ballyshannon return call to Malin Head CG.
15:30	Emergency 999 call from member of public, shouts for help heard in the water off Ard Malin. Note times person taken out of water.

- 15:34 Lough Swilly Lifeboat, Sligo Helicopter R118 and Greencastle CGU tasked.
- 15:47 Malin Head Radio Ch. 16 >CQ all stations (Distress message).
- 16:00 Information that a boat had upturned & 2 persons still missing.
- 16:05 Malin Head radio broadcasts MAYDAY RELAY CH 16 VHF - One person recovered from water, 2 other persons missing.
- 16:08 R118 Sligo helicopter locates upturned boat.
- 16:19 R118 recovered casualty in lifejacket proceeding to Altnegalvin Hospital.
- 16:28 R118 on pad at Altnegalvin Hospital.
- 16:28 Lough Swilly LB on scene search commences for third crewmember with other vessels.
- 16:57 Third crewmember sighted on rocks.
- 17:07 Body of third crewmember located, recovery commencing.
- 17:20 SELONCE FENEE, all vessels stood down.
- 17:48 Lough Swilly LB reports casualty vessel on tow but submerged.
- 19:12 Lough Swilly LB arrives at Portmore pier.
- 19:50 Lough Swilly LB alongside using shore crane to recover casualty vessel.

3. NARRATIVE

Fishing Trip

- 3.1 The boat was purchased from its previous owner about 8 years prior to the incident. Since purchase no modifications were made to the boat. The Skipper did not own the boat but he was usually in charge when it went out. He had been a deep-sea fisherman earlier in his life and he knew about the tides in the area.
- 3.2 At approximately 08:00 hrs. on the 17th July the Skipper and 2 crew arrived at Portronan Pier. The Skipper had contacted Crewmember No. 1 the night before asking him to bring his mobile phone as his had been damaged that day. Crewmember No. 1 was from Northern Ireland with a UK mobile phone service provider.
- 3.3 The boat was in the water moored to the pier. On the pier at Portronan there was a notice advising persons going to sea to 'Check their equipment and wear a lifejacket' (see Photograph No. 4 in Appendix 7.1). While there were three PFDs each rated at 100 newton buoyancy there were no whistles attached to them
- 3.4 The crew loaded a small auxiliary outboard engine, cans of fuel and a spare battery on board the boat. They proceeded out of Portronan up the channel between the rocks. About a mile out the engine was stopped and the vessel drifted whilst the crew were angling with rods. After about an hour's angling the vessel was drifting close to shore so the engine was started to go further out. It very quickly stopped. On investigation it was found that the petrol tank which was located on a shelf under the aft seat had fallen on its side. It was put back in position and Crewmember No. 1 squeezed the priming bulb in the fuel line while the Skipper tried the electric starter.
- 3.5 The engine did not start and the battery was failing. The vessel was drifting onshore so the grapple anchor was deployed over the stern and attached to the ski post on the port side. The spare battery was connected with jump leads but the engine still did not start. A wave washed over the stern and into the boat. The water level was about 6 to 9 inches (15-23 cms) in the cockpit. The Skipper instructed the youngest Crewmember (Crewmember No. 2) to don a PFD and Crewmember No. 1 to phone the Coast Guard whilst he began pumping the water out with the bilge pump.

Emergency Call

- 3.6 Crewmember No. 1 had a mobile phone from a UK operator. He dialled 999 at 10.16 and the emergency call was routed through the ECAS centre at Navan. He was asked by the Navan ECAS operator ("A") which service he required. He thought he heard "what service do you require" but thought it was a recording and waited for options. A second wave came over and the boat flooded and he heard ECAS again

and said he was looking for the Coast Guard and that they were off Malin Head and sinking. A copy of the recording of the call was obtained by the MCIB from ECAS at Navan. This is the transcript of the recording of the emergency call from UK mobile number 0044 749xxxxxx received by the operator at ECAS Navan, referred to as “A”, and connected by ECAS Navan to the Irish Coastguard MRSC at Malin Head, referred to as “B”, on the 17th July 2018 (see Appendix 7.20).

(Time elapsed after 10:16 hrs. in seconds on the left hand side)

00 Voice - words not decipherable
 04 ECAS Operator - Emergency, which service
 05 Caller - Hello,
 07 Operator - Do you need Garda, Ambulance, Fire or Coastguard
 08 Caller - hello
 09 Indecipherable voices in background
 10 Operator (Raised Voice) - Do you need Garda, Ambulance, Fire or Coastguard
 13 Caller - we need Coastguard
 15 Operator - Coastguard, Thank You
 16 Operator - Do you need the Coastguard in Donegal
 17 Caller - yes, off Malin Head (pause) Boats sinking
 24 Ring Tone - caller in background - “boats sinking.”

28 MH CG - Answering
 29 Operator- Customer 4 mobile
 31 MH-CG - yes
 32 MH-CG - Hello, hello
 33 sounds, faint voices but no decipherable words
 35 MH CG - Hello
 37 MH-CG - Hello, hello
 38 Buzzing sound
 40 MH-CG - Hello, hello -, buzzing sound in background
 48 MH-CG - Hello, hello -, buzzing sound in background
 50 MH-CG - Hello, hello -, buzzing sound in background
 52 MH-CG - Hello, hello -, buzzing sound in background
 53 - 59 Buzzing sounds

1:05 MH CG - Operator, operator - Buzzing sounds in background
1:09 Click
1:10 Operator- Hello
1:11 click

- 3.7 28 seconds into the call, “A” linked the call with the IRCG. The recording made by the IRCG of this part of the call does not have any definable words, only warbling and buzzing sounds. The IRCG operator (“B”) ended the call because he thought the ECAS operator (“A”) had disconnected when he/she did not reply to him/her. The ECAS recording¹ records the ECAS operator replying one second later, and the caller’s phone went dead at the same time.
- 3.8 “B” then called the mobile number at 10:16, 10:18 and 10:20 but went through to its voicemail.
- 3.9 “B” then called ECAS back but called ECAS at Ballyshannon where he/she spoke to ECAS supervisor “C”. This is the recording of that call at 10:20 by “B” to “C”:

(Time elapsed after 10:20 hrs. in seconds on the left hand side)

10:20 local/09:20 MHCG to ECAS Ballyshannon

25 ECAS Ballyshannon (name) speaking
26 CG - Hi good morning(name), (name) speaking from Malin Hd.
30 ECAS - Hi
30 CG -I had a call there at 0916 Zulu, 1016 local
39 ECAS -1016 aye
40 CG -from a northern number - Ballykenny Donegal
48 ECAS - yes
49 CG - (they asked for the?) coastguard
53 ECAS - I will have to have a wee look at that, have you a number
58 CG - Aye I do, a northern number 0044.....

- 3.10 “B” then called the UK mobile again twice at 10:21 and 10:22.
- 3.11 “A”, (Navan ECAS operator) who received and transferred the emergency call says they heard the words “boats sinking” and “Malin Head” and then the sounds described as if the phone was in the water. When the Coast Guard ended the connection, “A” alerted the lead operator in Navan (“D”) and told them to ring Malin Head Coast Guard.

1. ECAS provided recordings of the calls from the initial 999 call, IRCG provided recordings of the calls from the time the 999 call was transferred.

3.12 “D” looked at the file on the display screen and noted the number and mast location of the call. ECAS lead operators had the facility to listen to the recording of the incoming emergency call, but not the facility to play the recording over the phone line to the emergency service.

3.13 At 10:22 “D” at ECAS Navan rang the IRCG. This is the transcript of the recording of that call by “D” to “B”.

(Time elapsed after 10:22 hrs. in seconds on the left hand side)

10:22 (local) ECAS Navan to IRCG at Malin Head

09 CG - Malin Head CG

10 ECAS - Hi this is (name) in ECAS Navan

12 CG - Hi

13 ECAS -One of our operators just put through a call through to you for Malin Head and the line was really bad, just want to make sure you got the phone number.

23 CG - Yes, I rang Ballyshannon, did not know it was Navan

28 ECAS - You rang Ballyshannon? (surprised voice)

34 CG - We got the phone number, the line cleared, the line went dead.

36 ECAS - yes it sounded like really bad reception

40 CG - Ay and the outside call the number back a few times now and it is just going to voice mail and the voice mail is saying (Name) can't take your call right now

52 ECAS - Ok that is all I have is Malin Head, Ballykenny in Donegal²

56 CG - can't seem to get through to the number

1:00 ECAS - yes

1:02 CG - There is nothing else I can do now, I will keep trying the number, maybe the phone might ring, maybe I might get reception.

ECAS - May I just get your name please.

1:13 CG - (name)

3.14 At 10:23 the lead operator “C”, from **ECAS Ballyshannon** rang the IRCG at Malin Head and spoke to a **different IRCG person (“E”)** than “B”, who was still on the line to “D” at **ECAS Navan** (where the original 999 call had been taken by “A”). This was the call back promised from the first call by “B” of the IRCG to “C” of ECAS Ballyshannon at 10:20. This is the transcript of that call:

2. The information “Malin Head, Ballykenny in Donegal” is from mast location on ECAS operators screens

10:23 ECAS Ballyshannon to CG Malin Head

- 10 CG - Malin Head Coast Guard
- 11 ECAS - Hi this is (name) from Ballyshannon can I speak to (name) please
- 14 CG - Aye, (name) is talking to Navan, there
- 17 ECAS - yes, yes, they just requested the coastguard Donegal off Malin Head, and that's all they said to the operator.
- 20 CG - Aye, we tried ringing the number, it's a UK mobile and just going to voicemail
- 21 ECAS - Yes
- 22 CG - Ok that's fine

3.15 "C" confirmed to IRCG ("E") that the caller had asked for "*the Coast Guard Donegal off Malin Head*" and confirmed the mast location. "C" did not offer to listen to the recording to see if there was any more information. "E" did not ask for any more details or for what was said in the initial call at 10:16 before it was connected.

3.16 The MRSC at Malin Head called the UK mobile 6 more times at 10:25, 10:26, 10:29, 10:31, 10:40 and at 10:41.

3.17 The transcripts of the recordings of the calls are at Appendix 7.20. A summary of the calls is set out as follows:

Time

- 10:16 Initial 999 Call Received via ECAS from Number 0044749xxxxxxx no information received from call and Call ends
LOCATION DIMENSIONS: 330° 18.865 km² LEVEL OF CONFIDENCE: 2%
Note: The above information is generated by ECAS and indicates the position of the receiving aerial. AML data was not available from this call.
- 10:17 Called Number Back - Voice Mail (person's name)
- 10:18 Called Number Back - Voice Mail (person's name)
- 10:20 Called Number Back - Voice Mail (person's name)
- 10:21 Called Number Back - Voice Mail (person's name)
- 10:21 Called Number Back - Voice Mail (person's name)
- 10:22 Malin Head CG Called ESCAS for More Information - will revert took details

- 10:23 ECAS Navan call Malin Head CG - gave details of emergency call
- 10:23 ECAS Ballyshannon call Malin Head CG - returning with details to different CG operator
- 10:25 Called Number Back - Voice Mail (person's name)
- 10:26 Called Number Back - Voice Mail (person's name)
- 10:29 Called Number Back - Voice Mail (person's name)
- 10:31 Called Number Back - Voice Mail (person's name)
- 10:40 Called Number Back - Voice Mail (person's name)

Vessel Founders

- 3.18 At the same time as the initial emergency call was made by Crewmember No.1, a second wave came over the stern. Crewmember No. 1 had shouted into the phone "*we need Coast Guard*", he confirmed that he was in Donegal "*off Malin Head*" and twice said "*boats sinking.*" At the time the emergency call was being put through by "A" (ECAS Navan) to "B" (IRCG), Crewmember No. 1 dropped the phone (or lost it when he went into the water) and it sank.
- 3.19 After the second wave came over the stern, the boat sank by the stern with the bow pointing into the air. The crew went into the water. The boat submerged to just below the water with the two fenders on the port side floating on the surface. The two Crewmembers without PFDs (the Skipper and Crewmember No. 1) clung to the fenders. Crewmember No. 2, who was wearing a PFD, floated close by.
- 3.20 After a short time, probably 5 to 10 minutes, the Skipper let go of the fender and drifted away face down. Crewmember No. 2 in the PFD was drifting some distance from the boat and Crewmember No.1 shouted to him from time to time. After between 45 minutes and 1:15 hrs. Crewmember No. 2 stopped responding to his shouts.

Rescue of Crewmembers 1 & 2

- 3.21 At some point Crewmember No. 1 decided to swim to shore about 600 meters (m) away. He got within 20 m. of shore but the tide and backwash from the waves prevented him from getting any closer. Also, the rocks were steep and he did not think he could climb out. He swam back to the boat and hung on to the fender. Now and again he climbed up on the boat to get out of the water, however, air bubbles came out through the hull to deck joint and he was afraid the boat would sink. Sometime later before 15:30 hrs. he saw a boat in the distance further up the coast. He climbed on to the boat and waved. The boat came nearer and he started shouting for help. A man in a cottage on the shore about 1000 m. away heard Crewmember No. 1's shouts and came out to investigate. When he saw him, he called 999. The call was timed at 15:30 hrs.

- 3.22 The boat saw Crewmember No. 1 and came alongside him and pulled him on board. The boat's Skipper called the Coast Guard and informed it of another two crew who were missing. The survivor, Crewmember No. 1, was brought back to Portronan Pier by this boat.
- 3.23 The Coast Guard tasked the Lough Swilly All-Weather Lifeboat (ALB), the Sligo Helicopter R118 and the Greencastle Coast Guard Unit (CGU).
- 3.24 When a second 999 call came in at 15:30 and when the name of the survivor was ascertained the connection with the 999 call in the morning at 10:16 was made by the IRCG.
- 3.25 Helicopter 118 arrived on scene at 16:08 hrs. and rescued Crewmember No. 2 who was wearing a PFD. He was unconscious. The helicopter brought him straight to Altnegalvin Hospital, Co. Derry where he subsequently passed away without regaining consciousness.
- 3.26 The Lough Swilly ALB arrived on scene at 16:28 hrs. and along with local fishing boats commenced a line search for the Skipper. Shore parties spotted something on the rocks and the lifeboat sent crew ashore. They found the body of the Skipper on the rocks at the high-water mark. The body was recovered by shore teams from the Garda Síochána and Greencastle CGU.
- 3.27 The Lough Swilly ALB returned to the sunken vessel and took it under tow. It was submerged and it touched bottom in shallow water. It brought the boat into Portmore Pier (Malin Head Harbour, see Location Diagram in No. 1 Appendix 7.2) where it was lifted out on the shore crane and then refloated. It was later put on its trailer and brought to a Garda compound at Letterkenny.

Inspection of vessel

- 3.28 The vessel was inspected in the Garda compound in Letterkenny on the 26th July, 2018. The vessel was on a 4-wheel trailer and the following was observed:
- The two forward and the port side windows were missing.
 - The cover for the outboard engine was missing.
 - The fuel tank had become detached from the fuel line and was missing.
 - The fuel line was attached to the tank with a plastic threaded fitting which was undamaged.
 - There was a Johnson 4 hp. outboard engine in the cuddy and a bracket for this engine on the transom.
 - There was a 5 gallon jerrycan full of fuel in the cockpit.
 - A second battery with jump leads in the cockpit.
 - 3 fishing rods.
 - A fixed manual bilge pump.

Post Mortem

- 3.29 The post mortem on the Skipper found the cause of death as ‘sea water drowning’. The results of the autopsy provided to the MCIB at the time of publication are provisional. The determination of the cause of death is a matter for the Coroner’s inquest. The Coroner has confirmed that Crewmember No. 1 recalled, in terms also advised to the MCIB, that the Skipper had floated off the fender, was face down in the water, and that Crewmember No. 1 thought “he was gone” before they were more than about 7 minutes in the water.
- 3.29.1 There was no autopsy on Crewmember No. 2 (from Scotland but living in Derry), who was wearing a PFD and had stopped responding to Crewmember No. 1 after about between 45 minutes to 1 hr. and 15 minutes. Crewmember No. 2 was rescued at 16:19 hrs. and arrived at Altnagelvin Hospital at 16:28 hrs. where he passed away without regaining consciousness. The causes of death on the death certificate were listed as (a) hypothermic cardiac arrest and (b) drowning.

4. ANALYSIS

4.1 There are 7 factors which combined to cause and increase the severity of this very serious marine casualty.

- (1) The design and construction of the boat.
- (2) Failure to plan for the voyage and emergency situations.
- (3) Failure to have a VHF radio.
- (4) The use of a mobile without Advanced Mobile Location (AML) capacity for location tracing.
- (5) Failure to wear PFDs.
- (6) Actions during the incident by the Casualties.
- (7) Events post incident by the ECAS operators and the Coast Guard.

4.2 The boat was powered by an outboard engine which was attached to a cutaway portion of the transom. Forward of the cutaway in the transom was a splash pan which drained overboard. The height of the transom was 500 mm and the height of the splash pan was a further 150 mm giving a total height of 650 mm above the keel. The actual freeboard aft was much less than 650 mm as the weight of the outboard engine, 3 persons, 2 batteries and 2 cans of fuel was all located aft. The boat was vulnerable to swamping from waves coming from astern. In addition, there was no solid buoyancy in the boat to keep it above water when swamped. It only remained afloat due to the air trapped under the port bunk.

4.3 The Code of Practice for The Safe Operation of Recreational Craft (CoP) recommends including the following equipment for vessels in sheltered/coastal waters:

- Suitable PFD/Lifejacket 150 Newtons for each person on board (at least 100 Newtons for sheltered waters).
- Two hand held distress flares and 2 orange smoke signals.
- Waterproof hand-held VHF radio.
- Mobile phone (in waterproof holder).
- Foghorn (powered or aerosol type).
- Manual bilge pump.
- Anchor and warp.

4.4 Under SOLAS Chapter V all vessels are required to plan voyages/passages. Appendix 7.17 gives the requirements for Regulation 34 Voyage Planning. Whilst the voyage plan does not necessarily have to be written down the last paragraph is essential 'Information ashore: make sure that someone ashore knows the plans for the trip and knows what to do should they become concerned for the crews' well-being'. If in doubt as to the reliability of communication with a person ashore the Coast

Guard should be informed of the voyage plan. Had a call been made to the Coast Guard before setting out the phone number would have been on record and the probable location of the boat known. This would have given the Coast Guard an alternative starting point for a search when the 999 call at 10:16 hrs. was made. In addition, the Coast Guard would have known the number of persons on board and have had a dialogue about the voyage planned.

- 4.5 A secondary means of signalling in an emergency is required. Mini flares and smoke floats are effective but they need to be located so they float free of the boat in the event of sinking. Sounding an aerosol powered foghorn would also have attracted attention from persons onshore. If whistles had been attached to the PFD's they could have been used to attract attention.
- 4.6 The CoP recommends the carrying of a waterproof hand-held VHF radio for communication. There was no VHF radio on this craft. If there had been a "MAYDAY" message transmitted by VHF radio it would have been received by any other vessel in the vicinity listening on Channel 16 and by the Coast Guard. A VHF equipped with a Digital Selective Calling (DSC) facility will transmit a "MAYDAY" with the vessel's identification and position by pressing the DSC button on the VHF. If a VHF was on board, and used, the emergency services could have responded earlier. Search and rescue at sea is based on radio rather than the 999 or 112 phone system. The Coast Guard maintains permanent listening watch 24/7 at three co-ordinating stations at Malin Head, Valentia and Dublin and is therefore much more suited to emergency response to seagoing events than land line or mobile telephony.
- 4.7 A mobile phone was being used as the only means of communication. The mobile phone was not in a waterproof holder and it was not secured to the person.
- 4.8 Mobile phones are not a suitable means of calling for assistance in the marine environment. In the first instance any call can only be received by the number to which it is made, either private or 999/112. If VHF radio is used anyone listening on the emergency frequency can hear and relay the message if appropriate. The mobile phone used to make the emergency call in this case was registered outside the Irish jurisdiction i.e. it had a +44 number and was therefore considered by the ECAS system to be a foreign telephone number.
- 4.9 A mobile phone call to 999 or 112 will display the number and mast location to the ECAS operator receiving the call. Since the application of AML services in October 2017 the operator may also be advised of the Global Positioning System (GPS) location of the caller. AML will not be available if the call emanates from a foreign number. Only the number and mast location is provided to the operator in cases of calls from a foreign number. AML may not be available depending on the phone handset used to make the call as AML may not be enabled on the mobile device due to its operating system. The AML system was developed for land based application for Android and later extended to smartphones operating under IOS 11.3. It is

implemented by Eir, Three, Vodafone and BT Ireland. The limitations on the ability to trace calls from a foreign number contributed to the outcome as can be seen in part 3.

- 4.10 Marine Notice No. 10 of 2016³ outlined the Regulations for wearing PFDs/ Life-jackets in small boats - see Appendix 7.18. The Regulations states that *'a suitable PFD must be worn at all times by anyone on board a moving pleasure craft that is under 7 meters in length'*. The crew should have been wearing PFDs all the time but when the first wave came on board, they should all have donned PFDs. Failure to do this had severe consequences when they were in the water.
- 4.11 When the outboard engine stopped the initial action was to ascertain the cause and try to restart it. When the engine did not start and the battery was failing it was time to re-assess the situation. The vessel was drifting ashore and the action to anchor by the stern was made. The CoP advises on page 163 under *Dangers involved in Anchoring* *'Anchoring a small boat by the stern may result in swamping and capsize. The transom area offers less freeboard than the bow and greater resistance to tide and weather'*. It would not have been difficult to open the fore hatch and deploy the anchor over the bow. Had this been done the vessel may not have been swamped.
- 4.12 The assumption was made that the engine had stopped because the tank had fallen on its side. Further checks should have been made. The fuel tank was not recovered and its connection on the fuel line was undamaged. The tank could have unscrewed during the tow or the fuel line may have worked loose causing the engine to stop. There was an auxiliary engine and it could have been used to get back to Portronan Pier where the problem with the main engine could be sorted out in safety.
- 4.13 When the first wave came over the stern the vessel was in imminent danger due to the accumulation of water under the floor at the aft end of the boat. The Skipper recognised this by instructing Crewmember No. 2 to don a PFD and Crewmember No. 1 to phone the Coast Guard. A more important action should have been to transfer the anchor line attachment to a bow fitting and get the bow into the waves before another wave came aboard. Also, the crew should have moved forward to trim the boat and raise the stern.
- 4.14 Once in the water it was a matter of survival. Cold water shock is the uncontrollable reaction of the body when it is first submerged in cold water (15°C or lower). In initial submersion, the body will experience a gasp reflex, which is a rapid intake of air. This is followed by a fourfold increase in breathing rate and associated increases in heart rate and blood pressure, making some people susceptible to heart attacks. These symptoms will last up to 3-5 minutes during which even the fittest person is unable to swim or to focus on breathing. Wearing a PFD with the correct buoyancy is vital to survival. Without a PFD even the most

3. Marine Notice 10 of 2016 (and Marine Notice 45 of 2012) have been replaced by Marine Notice 32 of 2019 (see Appendix 7.18).

competent swimmer will suffer from ‘swim failure’ after around 30 minutes of swimming in cold water. If you are wearing a well-fitting PFD with crotch straps, there is no need to swim and you can concentrate on keeping warm, conserving energy and making yourself visible.⁴ The essential rule is for the crew to keep together for encouragement and support.

- 4.15 When help had not appeared after about half an hour a decision by Crewmembers No. 1 and 2 had to be made, either stay with the boat which might sink completely, or swim to shore. The shore was about 600 m away. The tide was setting along the coast to the north. By swimming directly to shore they would end up at a place where they could get out easily. They would swim as a group taking the two fenders for buoyancy. Such decisions and techniques are taught and practiced on a one-day Personal Survival Techniques (PST) course.
- 4.16 There is no mandatory requirement for training or demonstration of nautical knowledge before taking a boat to sea. There is a legal responsibility on the Skipper of a boat to ensure the boat is maintained, equipped and operated in a seaworthy manner. Full details on legal requirements and recommended equipment are given in: The Code of Practice: ‘The Safe Operation of Recreational Craft’ published by the Department of Transport, Tourism and Sport (DTTAS) which is available online or in print, free of charge, by application to marineleisuresafety@dttas.ie.

Currently there are a number of courses operated from training centres around the country:

- (1) National Powerboat Certificate - 14 hours Tuition and Practical Boat handling.
- (2) Personal Survival Techniques (PST) course - one day Tuition and Practical in a pool.

Emergency Call Answering Service (ECAS)

- 4.17 The Emergency Call Answering Service (ECAS) is the national Public Service Answering Point for calls to the Emergency Services. Following the introduction of the Communications Regulation (Amendment) Act of 2007, the Department of Communications, Energy and Natural Resources (DCENR) tendered for a supplier to provide the Emergency Call Answering Service (ECAS) for Ireland. On completion of this open tender process BT was awarded the contract (known as a Concession Agreement) to provide 112 and 999 call answering services on behalf of Ireland.
- 4.18 The call answering service is for each of the emergency services (Garda, Ambulance, Fire, Coast Guard and, in cases involving aircraft, Air Traffic Control). The Department (now the Department of Communications, Climate Action and Environment) has confirmed to the MCIB that the *“ECAS service is required to answer all emergency calls to 112/999, to screen out non-genuine calls, to*

4. Source: RNLI. Lifejackets- How to choose a Lifejacket and maintain it.

establish the emergency services requested, to establish caller location, and if different, incident location for the purpose of being able to route a call to the appropriate emergency service centre".⁵ The ECAS service as evidenced by its procedures set out below, does in fact reflect a broader function than simply establishing caller location or incident location *for the purpose of routing a call to an appropriate emergency centre*. Part of the function of ECAS as evolved is therefore to establish caller location.

- 4.19 In its submissions to the MCIB, BT ECAS advised that it was established by the Communications Regulation (Amendment) Act 2007 as a call answering service for each of the emergency services (Garda, Ambulance, Fire, Coast Guard and, in cases involving aircraft, Air Traffic Control). ECAS stated its role as being to respond to all incoming calls, identify and pass the call through to the appropriate emergency service as quickly as possible. ECAS is the first line of the emergency response process, however, its operators are not emergency service responders.
- 4.20 ECAS stated that it is responsible for answering an emergency call within very short timescales, filtering out calls that are non-genuine or erroneously made according to strict procedures, connecting the call to the emergency service requested by the caller, and providing the caller location recorded by the ECAS systems to the relevant emergency service. Its operators are not trained in any emergency services protocols, processes or procedures. ECAS processes relate solely to ensuring that calls are answered and routed appropriately, and that call details and location are electronically recorded and provided as the emergency services may require.
- 4.21 ECAS therefore identifies its role in relation to identifying the location of the caller as: *'solely to ensuring that calls are answered and routed appropriately, and that call details and location are electronically recorded and provided as the emergency services may require'*. The nature of this role, how it was carried out, how it was reflected in its procedures, and how it was understood by the IRCG, became one of the issues in this marine incident due to the circumstances surrounding the emergency call.

Mobile phones and location capacity

- 4.22 Details of a caller's number and location are displayed on ECAS and Coast Guard operators' screens. Phone's fitted with a GPS receiver can transmit the phones position when an emergency call is made and this will appear on the operator's screen. This is called AML. A call from a UK mobile phone does not allow it to give its GPS position, only which mobile phone mast was used to connect the call.
- 4.23 Crewmember No. 1 had a UK mobile phone and hence there was no AML information.

5. Source DCCA to MCIB 24.10.2019

4.24 The mast location identified to ECAS and the IRCG was Malin Head. The mast location is shown on Location Diagram No. 1 in Appendix 7.2. The phone mast covers an area up to 20 km from the mast and due to its location most of this area is over the sea.

Garda statements and related

4.25 During the investigation the importance of the emergency calls became apparent and the investigation looked at a number of sources:

- The transcripts of the calls (set out above).
- The call logs.
- Evidence given during the investigation.
- Garda Statements (copies provided by BT ECAS).
- ECAS event logs.

4.26 The following paragraphs set out more detail about the calls in the sequence in which the events unfolded, starting with the initial emergency call at 10.16 to ECAS at Navan, which was transferred to the IRCG at Malin Head. Thereafter the report considers the various relevant operating procedures from ECAS and the IRCG.

4.27 The ECAS operator at Navan (“A”) who transferred the emergency call to the Coast Guard (“B”) was aware that this was a genuine distress call and heard the words “boats sinking” and “off Malin Head” before the call was transferred to the Coast Guard. When the Coast Guard operator ended the call the possibility of replaying the first 30 seconds back was lost by that ECAS operator.

4.28 “A” had worked as a call taker at ECAS Navan for eight years at the time of the incident. “A” was working the 7:30 am to 7:30 pm shift on the 17th July 2018.

In “A”’s statement to an Garda Síochána (provided by BT ECAS) (see Appendix 7.6) ECAS (“A”) stated, inter alia that:

- I remember getting a phone call through the system.
- I recall it was an English mobile number, because it was an English mobile it gave me very little information but it stated that the call was coming from a mast located in north Donegal.
- I answered the phone “emergency services, do you need the Garda, fire brigade, ambulance or Coast Guard. When I answered the phone I could hear shouting and conversation. I knew there was someone on the phone but they didn’t respond so I repeated the message again and this time a male spoke back and he shouted Coast Guard.
- I heard him mention Malin Head and he said “sinking”.

- I think it was him or it could have been another person in the background. I could hear a number of voices in the background, it wasn't just one person.
- When the caller requested Coast Guard I put him through to the Coast Guard and the call went directly to Malin Head Coast Guard station.
- The technology we use directs the calls to their local emergency service, so as the call came from Donegal it automatically goes through to the local Coast Guard which was Malin Head.
- The Coast Guard answered and I told him "ECAS connect on a foreign mobile". When I said this the Coast Guard then takes over the call.
- The Coast Guard took the call but I remained online as per our regulations. I mute the call but I stay on to assist if needs be. When this occurs we are not allowed to interrupt the call unless we are requested.
- When the call was transferred I heard the phone line go odd and the Coast Guard wasn't getting any response, the Coast Guard hung up. Up until the time the Coast Guard hung up I was still online.
- When the Coast Guard terminated the call I remained live but the mobile was gone. I hung up and I immediately informed the lead operator ("D") and I said to "D", "could you listen to that call to make sure the Coast Guard got it, phone them to make sure they have the right number".
- I was concerned enough from the call to raise this. So ("D") came over and listened to the call and ("D") called the Coast Guard back to make sure they had the right mobile to contact them back.
- When "D" phoned the Coast Guard ("B") s/he stated that s/he had been on to ECAS at Ballyshannon. They would also have had access to the call. The Coast Guard did not request a play back.
- We have a facility to play 30 seconds playback but once the Coast Guard terminated the call the opportunity for me personally to play the playback is gone.
- Once I had concerns about the call I phone it on to my immediate supervisor as per my training. I had no further dealing with the call.

4.29 "A" also advised the MCIB that "A" heard the words "boats sinking" and "*Malin Head*", that "A" had no doubt that the call was genuine and that the caller was in distress, that "A" knew the caller had not spoken to or heard from "B" over the 36 seconds before "B" called to "A". "A" does not refer in the Garda statement to "B" calling out for the ECAS operator while "A" was on the line. The ECAS recording records the ECAS operator replying one second later.

4.30 When the Coast Guard operator ended the call the possibility of replaying the first 30 seconds back was lost by that ECAS operator. "A" informed "D" that the IRCG("B") had not obtained the callers number. Neither in the Garda statement nor to the MCIB is "A" recorded as telling "D" that "B" did not hear, and had not been

told, any information from the call “A” had with Crewmember No. 1. “A” does say that she asked “D” to listen to the call and that “D” did listen (as “D” later confirmed to the Gardaí, and set out below). The stated purpose of “A” talking to “D” and “D” calling the IRCG was, however, only to ensure that the IRCG had the telephone number. There was no reference to ensuring that any information about location or situation was passed on. It appears “A” was present at the call between “D” and “B” and therefore also heard that that call did not include advising “B” that what was heard included the words “boats sinking” and “Malin Head”.

4.31 The next call in the time sequence was the call by the IRCG (“B”) to ECAS but at Ballyshannon (“C”), after the emergency call failed. The transcript of the recording of that call between IRCG (“B”) and ECAS (“C”) is set out above in paragraph 3.9.

4.32 “C” worked as an emergency call taker at ECAS Ballyshannon. “C” was working on the 17th July 2018 and recalled that s/he had that morning been covering a break at the call centre. ECAS Ballyshannon was rung by “B” of the IRCG when the initial 999 call failed and “B” had been unable to get an answer from Crewmember No. 1. In “C’s” statement to an Garda Síochána, provided by BT ECAS, (see Appendix 7.7), “C” stated, inter alia that:

- The phone rang and it was Malin Head Coast Guard. I don’t recall the name.
- The Coast Guard asked regarding a specific call that they had received.
- As far as I can remember they would have had a mobile number or a location. I can’t remember the details exactly. I would have brought up the call on a computer in the office and I brought the call up and listened and to be honest I can’t remember exactly what I said but I passed over the relevant details that I heard on the call.
- The Coast Guard didn’t look for any further details and he didn’t request a playback. The call was short, possibly not even a couple of minutes in length.
- That was the last I heard about it then until a couple of weeks later when the manager told me about it and that there maybe someone in to speak with me.

4.33 “C’s” Garda statement refers to only one call, whereas from the call log there were two. At 10:20 from “B” to “C” at ECAS Ballyshannon, and at 10:23 from “C” to another IRCG person (“E”) when “B” was on another line to ECAS Navan. The first call may have provided or confirmed the mobile number but no other information is recorded as being given. There is no reference to the emergency call having been listened to in the conversation with “B”. The second call from “C” to IRCG (“E”) is transcribed above. The relevant record of the second call is as follows:

ECAS - “yes, yes, they just requested the Coastguard Donegal off Malin Head, and that’s all they said to the operator”.

20 CG - “Aye, we tried ringing the number, it’s a UK mobile and just going to voicemail”.

21 ECAS - “Yes”.

- 4.34 There is no reference to the emergency call being listened to by “C” in the second call but the wording suggests that “C” did listen to the emergency call. “C” did not say the caller said that the boat was sinking or describe the tone of the call.
- 4.35 “C” told the MCIB that “C” was the lead operator at ECAS Ballyshannon, that “C” uploaded the call details on the display but did not listen to the call recording, that “C” advised “E” of the callers number and mast location, and that “C” assumed that as the IRCG was speaking to ECAS Navan that the IRCG would get all the other information from them.
- 4.36 The ECAS event log of the call (see Appendix 7.8) says *“B” from Malin Head Coastguard rang enquiring about a call. Listened to the call and passed over all the details needed. The CLI was 0044749.... -“C”*. The event log does refer to the call having been listened to by “C”. The details passed on are set out in the transcript of the 2 calls. They did not include advising the IRCG that what was heard included the words *“boats sinking”* nor was the genuine and urgent tone of the call conveyed (as described by “A” at ECAS Navan, and as is clear from the recording listened to by the MCIB).
- 4.37 The next call that occurred was the call from the lead operator at ECAS Navan (“D”) to the IRCG at 10:22, having been requested by “A” to listen to the initial emergency call, and to call the IRCG.
- 4.38 “D” had worked as an emergency call operator at ECAS Navan for 2 years at the time of the incident. “D” was working on the 17th July 2018. In “D’s” statement to an Garda Síochána provided by BT ECAS, (see Appendix 7.9) “D” stated, inter alia that:
- *I was contacted by my colleague (“A”) and “A” requested that I listen to “A’s” last call. “A” said that the caller sounded very distressed and “A” wanted the Coast Guard to know it was a genuine emergency. At this stage “A” had finished the call.*
 - *Once the conversation is ended the phone call is gone off your screen and the call is gone.*
 - *So straight away I went over to “A’s” control point, I searched “A’s” last call and I listened to it.*
 - *I listened to the call and I remember that it sounded very windy and you could tell he was on the sea. So I rang Malin Head Coast Guard control post and I rang them directly.*
 - *I said my colleague had a phone call a few minutes ago and the caller seemed distressed. I told him that I wanted to make sure that you have the right phone number.*
 - *The Coast Guard informed me that he had taken the call and that he had been in contact with ECAS Ballyshannon as he thought they were lead centre.*

- *I told him that I wanted to confirm that the mobile number he had was correct so I read over the number to him. I recall it was English mobile.*
- *He asked me had I a location for the call and I told him that all I had on my screen was Malin Head, Donegal.*
- *He said he had tried to phone the number back which made the call but it went straight to voicemail.*
- *That was it basically. I had no further dealings with the call after that.*
- *Once a call is made to us the following is logged, phone number, location, duration of call and what time the call is made.*

4.39 The transcript of the recorded call by “D” (ECAS Navan) to “B” at 10:22 is set out in full above in paragraph 3.13. The relevant parts are as follows:

ECAS - “One of our operators just put through a call through to you for Malin Head and the line was really bad, just want to make sure you got the phone number.”

23 CG - “Yes, I rang Ballyshannon, did not know it was Navan”.

28 ECAS - “You rang Ballyshannon?” (surprised voice).

34 CG - “We got the phone number, the line cleared, the line went dead”.

36 ECAS - “yes it sounded like really bad reception”.

40 CG - “Ay and the outside call the number back a few times now and it is just going to voice mail and the voice mail is saying (Name) can’t take your call right now”.

52 ECAS - “Ok that is all I have is Malin Head, Ballykenny in Donegal”.

56 CG - “can’t seem to get through to the number”.

4.40 The ECAS event log of the call by “D” (see Appendix 7.10) says “Rang “B” at Malin Head Coast Guard to ensure that a callers number and location was passed over correctly as line was very bad. Coast Guard said he rang Ballyshannon and asked for details”. The event log does not refer to the call having been listened to by “D”.

4.41 The Garda statement by “D” also says that “D” listened to the call as did “A’s” Garda statement. “D’s” statement states that the purpose of “D” calling the IRCG was to ensure that the IRCG had the telephone number. That is consistent with the ECAS event log. Even though both “A” and “D” say that “D” listened to the call and therefore heard the words “boats sinking” and “Malin Head”, there was no reference to ensuring that the information and the situation (identified by “A” when s/he heard the emergency call) was passed on, other than the mast location, even though “B” told “D” that he had not got through to the mobile. “D”, who was the lead operator at ECAS Navan confirmed the phone number and mast location but did not offer to listen to the recording to see if there was any more information. The Coast Guard operator did not ask for any more details or for what was said in the initial call before the Coast Guard was connected.

- 4.42 “D” advised the MCIB that “D” had not listened to the recording but had uploaded the log of the call on to the screen. BT ECAS has stated that “D” did in fact listen to the call, and that appears to be corroborated by the Garda statement made by “D” but not by the ECAS event log. “D” said that “D” did not provide any more information to “B” because “B” did not ask for more information. “D” also said s/he assumed that “B” had got the information from the recording from ECAS Ballyshannon from the earlier call. There is no record of this in the Garda statement, or of “D” asking “B” what information had s/he received.
- 4.43 ECAS submitted that from their perspective (in summary and as set out in greater detail hereafter), the problems with the Portronan call were:
1. IRCG ended the call before the first 30 seconds could be played back to them.
 2. ECAS operator flagged that the IRCG had ended the call abruptly.
 3. ECAS lead operator contacted the IRCG to confirm the 999 caller’s number.
 4. IRCG contacted Ballyshannon and this confused the situation.
 5. IRCG did not use the Hotline and did not request the lead operator to listen to the recording of the call.
 6. The lead operator listened to the call later but could not discern any information.
- 4.44 It appears that the call was ended by the IRCG because they had heard nothing from the caller and there was no response from the ECAS operator when called out to. It is not clear what other option the IRCG operator had other than to hang up and call back, which is what happened.
- 4.45 It is not possible, nor necessary, for the MCIB to determine whether the emergency call was listened to again by either or both of the ECAS personnel. What was actually conveyed to the IRCG is clear from the transcripts of the call. No one conveyed the content and the sense of the call as described by the initial ECAS operator, and all three operators knew that the IRCG had not heard that part of the call. Whether or not the IRCG called back on the correct line (an issue that is addressed in more detail below) does not appear to have any causative effect as neither location conveyed the content of the call. Having listened to the call the MCIB has a difficulty understanding why the content of the call was not conveyed. The position of ECAS in submissions is that the IRCG did not ask for the call to be listened to, and, that the requirement was for ECAS to respond to a request for information, once whatever call number/server/mast details had been provided. The ECAS submission and procedures and those of the IRCG are now considered in the following paragraphs.

ECAS Emergency Call facilities in July 2018

4.46 At an interview with ECAS management on the 5th March 2019 it was explained that:

- i) There are two ECAS call centres. One at Navan and one at Ballyshannon. The emergency service has no indication which ECAS centre is transferring the call.
- ii) During the live 999 call the ECAS operator can play back the first 30 seconds of the call to the particular emergency service that has been connected in to the call.
- iii) Once the initial call from ECAS to the emergency service has ended the ECAS operator cannot retrieve the recording.
- iv) The initial operator who transfers a call is empowered to speak up if they thought there was a problem with the call.
- v) The recording of the full call is stored on a server immediately accessible by an ECAS lead operator who could listen to it but not play it back down the phone line.
- vi) The reason for this limitation at the time, in July 2018, was stated by ECAS to be because they did not think it was necessary and had never been asked for this facility by the emergency services.
- vii) Lead operators have, since this incident been given the facility to play the recording of the call down to phone line to the emergency service.
- viii) The ECAS is kept continually under review. DCCAE has initiated a project with all relevant stakeholders, including ECAS, communications services providers, and the Commission for Communications Regulation to establish the technical steps required in order to enable AML technology for foreign registered mobile phones.

Relevant ECAS Procedures

4.47 Part 3 of this Report sets out the sequence of calls and related events arising from the emergency call. As a consequence, issues arise for consideration as to the applicable procedures in place at the time. During the investigation the MCIB was provided with **BT ECAS Call Handling Procedures 2017**, and, later in written submissions, with an extract from another document described as **ECAS/SUP/SO47**. Subsequent to that the MCIB was provided with version 16.1 of the ECAS Call Handling Procedures, after which it was confirmed that version 16 was in operation at the time of the incident. Version 16.1 came into being shortly after the incident but is described as being identical in all material respects. (See Appendix 7.11 for ECAS Call Handling Procedures ECAS/CHP/B002- Part 1 paragraph 2.5 and Part 2 paragraphs 2 & 3 - Version 16 referred to hereafter as 'ECAS/CHP').

- 4.48 ECAS provided **ECAS/SUP/SO47** ‘Communications between Emergency Services and ECAS’ version 10, dating from 14.8.2013 and applicable at the time. ECAS also provided **ECAS/SUP/SO47** version 13 containing revisions dated 12.9.2019, now entitled ‘ECAS Security Clearing Process’. (See Appendix 7.12 for **ECAS/SUP/SO47** version 10 and Appendix 7.13 for version 13). Both documents describe their audience as being the emergency services.
- 4.49 There are therefore 2 types of written procedural documents that ECAS says applied. **ECAS/CHP** seems to be an operations manual for internal use, while **ECAS/SUP/SO47** reflect external arrangements with an emphasis on issues of confidentiality and data protection. Limited information has been provided as to whether these documents were agreed with any emergency service or reflected in any agreed procedure. ECAS advised that in 2011 procedures were provided to IRCG. ECAS has provided an email circulating an earlier version of **ECAS/CHP**, being version 11 dating from 21 April 2011. The circulation email included the IRCG Divisional Controller. There are no documents evidencing circulation of the later versions to the IRCG. The IRCG says it was not aware of any agreed procedures. There was an emergency phone line identified and ECAS has provided a copy of a circular to the various Emergency Service (including the IRCG) of their new number after an Emergency Service Forum meeting on 13 September 2017. This circular stated that ‘the old contact numbers will remain operational but will only be used as a back-up for the new phone system’. It was in this context that the number remained in circulation and was used by the IRCG operator (Watch Officer) to contact ECAS (Ballyshannon) on the date in question, as opposed to the prescribed primary number. That circular noted that the enhanced facilities would enable ECAS to handle multiple simultaneous calls from the emergency services to lead operators in different ECAS centres at the same time. The IRCG procedures are set out later starting at paragraph 4.63. ECAS say it was aware of the IRCG procedures as set out in **SAR OPS Notice 5/18** (which postdated the incident) as the IRCG consulted ECAS on its content.
- 4.50 BT ECAS Procedures version 16 (applicable at the time of the incident): **ECAS/CHP/B002- part 1 - Call Handling Principles**, provides as follows at paragraph 2.5:

“2.5 Monitoring of Emergency Calls

During emergency call handling, and only where specified in procedure, operators will need to monitor certain call types. Call monitoring is split into three types:

- *Monitoring Type A = A call routed to an emergency service is monitored for its entire duration. Calls that are monitored for the entire duration are Children Playing calls, distressed callers and when requested to do so by the emergency services.*
- *Monitoring Type B = Monitoring is terminated when the case location has been identified by the ES and confirmed by the caller.*

When connecting a call to the Garda, Fire or Ambulance (excluding Dublin) the call is monitored until the county and/or town is identified by the caller and acknowledged by the ES call taker.

Exception to the rule

There are two situations where we ask operators to monitor calls differently:

- Dublin Ambulance*
- Coastguard*

In all of these situations the operator must remain on the call until the entire address has been given and it is clear the ES has moved on to discuss the details of the call. Examples of this would be the ES saying - “what is the problem”, “can you repeat your phone number”.

If the call is routed to the Garda and they are discussing the incident and no location is forthcoming, after 20 seconds of a 2 way conversation, type in NL and relinquish.

In the unlikely event of monitoring an ambulance or fire call where the location has not been discussed after 5 minutes, notify the lead operator, who will then ring the ES concerned to ascertain if you are required to remain on the call.

If monitoring is terminated without sufficient evidence that the call was routed to the correct control room, the call will be deemed as under-monitored. If monitoring continues beyond the point where it is obvious that the ES has taken control of the call and the operator can add no other value, this will be deemed as over-monitored unless the operator has a valid reason to remain on the call.

It is sufficient to have only the initial of the ES requested and the county and/or town typed into the Remarks field. No further address details such as house number, street or townland are required. It is important to continue to capture other necessary details such as MM, Multi, NL etc. MM = address mismatch. The caller is looking for assistance at an address while located elsewhere; Multi = more than one emergency service requested by the caller; NL = no location, caller is unable to provide location details.

Monitoring Type C= monitoring is terminated at the point of answer by the emergency service. This type of call monitoring requires that electronic transfer of Case data is in place with the answering emergency services. Monitoring Type C is likely to be introduced at a future point in time when electronic transfer of Case Data is in place with the answering emergency services

- 4.51 ECAS describes the emergency call as being treated as Type B although it in fact appears to be subject to the identified exceptions as the caller sought the IRCG. Section 2.5 of the ECAS/CHP lays emphasis on the need for monitoring to ensure

that the Emergency Service receives the location address. There is a particular emphasis for the IRCG: In all of these situations *the operator must remain on the call until the entire address has been given and it is clear the ES has moved on to discuss the details of the call.*

- 4.52 BT ECAS Procedures version 16: ECAS/CHP/B002 - **part 2 Call Classification & Information Representation, paragraph 2**, provides various instructions to enable location be identified. By way of example:

"Location Information Location Verification on Calls from Mobiles and Landline Numbers

..... Ask the caller "In which (county) do you need the (ES requested)?".....

*If more than one match is found, verify the correct location with the caller.⁶
.....If caller is unable to confirm location details:.....*

Hand over call as "ECAS connecting (number or a unique ID) with no confirmed location".....

To enable an ES to have a clear indication of any discrepancy between a caller's suggested area and system displayed area:

- After typing an area in the [SEARCH CRITERIA] field, check the [name and address] field and [STATUS] field.*
- If town/county details match, handover call as normal "ECAS connecting (number)."*
- If town/county details do not match, or caller unable to provide details, handover call as "ECAS connecting (number) my records currently show (town/county), caller has advised (town/county)" and if necessary explain to the ES that caller is not sure of exact whereabouts."*

- 4.53 BT ECAS Procedures version 16: ECAS/CHP/B002 - **part 2 Call Classification & Information Representation** provides as follows at **paragraph 3**:

"Miscellaneous Procedures

3.1 Call Playback

*The workstations automatically records the first 30 seconds of the call. The emergency service may benefit from information mentioned at the start of the call background noises, location information etc. If you feel it would be beneficial to the ES you **MUST** proactively offer the playback facility. This should only be*

6. With immaterial parts edited out, for entire see complete text of part 2 at appendix 7.11

offered after the caller has cleared. If the ES do not accept the playback and you still feel there is a benefit from the playback you MUST strongly recommend the use of this facility.

To use call playback:

- *The ES should be told “This playback facility will not be available when our call has ended.”*
- *Press [Play].*
- *Type details of the call and CALL PLAYED BACK in the [REMARKS] field.*

Offering the playback facility could aid the emergency services in providing help to the emergency caller in a timely manner.

- *NOTE: Call Playback is no longer available if a call has been slotted.*
- *The playback on a Represented call will offer the first 30 seconds of the represented call not the initial call.”⁷*

4.54 In addition to the CHP, ECAS also provided **Communications Between Emergency Services and ECAS: ECAS/SUP/SO47** version 10, dating from 14.8.2013 applicable at the time (ECAS/SUP/SO47 version 13 dates from 12.9.2019).⁸ This provides for contact arrangements in the noted circumstances and provides a number for the Coast Guard to contact ECAS on. It does not provide that this is the only number that is to be used. It did not provide for a Hot Line which was only introduced in Version 13.

4.55 Section 5 provides for where Emergency Services may need to query details of a recently received emergency call. Sections 5.5 and 5.6 provide:

5.5 INFORMATION EXCHANGE

Emergency Service will explain situation and ask for details about a specific call detailing the CLI and approximate time of call.

The ECAS Manager will locate the details of the call from the ECAS Management Information System and pass these verbally to the Emergency Service.

7. ECAS explained the meaning of a "represented call to the MCIB" as follows. In ECAS, all Emergency calls received are initially handled by ("presented to") an ECAS agent, connected to an Emergency Service and the ECAS agent leaves the call after connection to the ES in accordance with call handling procedures. Should either the Caller or the Emergency Service clear the line but the other party remains on the call and does not hang up then the call is "Re-Presented" to the next available ECAS agent with the full call details and history available to them so as to facilitate connection to a different emergency service or to query additional information about the call. Playback of the first 30 seconds of the call (from the first presentation to an ECAS agent) is not available in this second presentation.

8. See Appendix 7.12 for ECAS/SUP/SO47 version 10 and Appendix 7.13 for version 13.

ECAS/SUP/SO47 version 13 that dates from 12.9.2019 contains no significant changes to sections 5.5 and 5.6. The changes reflect the altered facility to enable the lead operator "under very specific guidelines" to play call recordings via the ES Hotline to members of the ES as long as they call ECAS from designated numbers (if they can access those control rooms that have those ECAS approved numbers) and only if the calls are live.

5.6 REPLAY & CONFIRM

ECAS Manager will confirm with the Emergency Service that all the requested information about the call has been passed to and understood by the Emergency Service.

4.56 ECAS engaged with the MCIB investigation and made submissions and provided documents. It made submissions in relation to the scope of its role with the Department of Communications set out at paragraphs 4.17 to 4.21. ECAS submitted⁹ to the MCIB that:

4.56.1 Once ECAS connects a caller to the emergency service, the ECAS operator will continue to monitor the call until such time as they are satisfied caller location has been confirmed by the Emergency Service and that there is no further information being sought by the Emergency Service (as per procedure “Call Handling Principles”¹⁰).

4.56.2 However, the ECAS operator will not participate in or interrupt the call in any way unless proactively requested by the emergency service, nor will they offer any information or detail in relation to the content of the call. Such is not the role of the ECAS operator and any interference could risk the quality and veracity of information that the emergency services obtain from the call.

4.56.3 The ECAS operator must proactively offer call playback in certain circumstances, however, the operator cannot do this until “after the caller has cleared” (stated in the “Call Handling Principles”). This is significant in relation to this incident as the callers’ line was still active up until the time the Coast Guard left the call, and therefore there was no opportunity to proactively offer to replay the call recording.

4.56.4 Once a call is terminated, a separate procedure applies relating to ‘Active Calls’ (which is a call that has ended but the incident is still ongoing and help has not arrived). The relevant process is ECAS SUP SO47 Communications between Emergency Services and ECAS.

4.56.5 BT is confident that each of its operators followed this procedure fully in relation to this incident, notwithstanding that the Coast Guard did not contact the designated hotline number for active call queries. As is evident from the procedure, the role of the ECAS operator is to verify the validity of the request, provide the information requested by the Coast Guard, confirm that the information is understood, and log the call details. The Coast Guard’s procedures¹¹ indicates that the Coast Guard call taker should ‘ensure you have all the information you need to pursue the incident, before terminating the call’.

9. Letter from BT ECAS to MCIB dated 12.9.2019.

10. At Appendix 7.11.

11. The Aide memoire is Appendix 7.15.

4.56.6 For completeness, and given the clarity on the scope of the role of ECAS as set out above, BT would like the MCIB to record that in relation to this incident, the emergency call was answered by the ECAS operator within 1 second. Within 15 seconds of the call, s/he had identified that the caller required the services of the Coast Guard and had routed the call to the Coast Guard accordingly. Between 10:16 am when the call was received and 10:24 am, ECAS operators had been in contact with the Coast Guard three times and on each occasion relayed the information that was required of them. At that point, given that the Coast Guard made no further attempt to contact ECAS, the involvement of ECAS in this incident ceased (until a call was made at 15:30 pm by a third party, which was answered and routed to the Coast Guard by the ECAS in accordance with procedure).

4.57 In addition,

4.57.1 BT ECAS says that ECAS provided the Coast Guard with the following information:

- a. Mobile mast location information;
- b. Townland of the mobile mast;
- c. 'off Malin Head';
- d. 'Malin Head';
- e. the assistance of the Coast Guard was sought; and
- f. the phone number.

4.57.2 ECAS does not agree that there is evidence that if the Coast Guard was told of 'boat sinking' that a search and rescue operation would have been launched.

4.57.3 ECAS points out that the Coast Guard does not have an indication which ECAS centre is forwarding the emergency call. The correct procedure is to call ECAS on a hotline as outlined in the ECAS procedures in Appendix 7.11, this would have automatically routed the Coastguard to the correct call centre i.e. Navan). The Coast Guard at Malin Head called the ECAS centre at Ballyshannon using the office number at 10:20 hrs. to ascertain more details on the call. The lead operator who answered the call replied that Ballyshannon had not transferred the call but that s/he would look at the file and call back.

4.57.4. BT ECAS informed the MCIB that "*It is not stated procedure for lead operators to listen to the call recordings in the circumstances which occurred.*"

4.58 The above does not appear to be reflected in the documents or the events in a number of respects: the contents of paragraph 4.56.2 is not in any procedure provided and is not consistent with the preceding paragraph. The assertion at paragraph 4.56.2 is not consistent with the ECAS policy and its emphasis on ensuring important location information is conveyed. With regard to 4.57.3, the

reason for the IRCG terminating the call has been set out above and while the call could not have been replayed down the line, the content could have been. The ECAS procedure reflects the importance of the initial emergency call. It is not at all clear that *“The relevant process is ECAS SUP SO47 Communications between Emergency Services and ECAS”*. Nor is it clear why a breakdown in communications set out in one policy document would then be addressed in an entirely separate document that is not referred to in the first document. With regard to the contents of paragraph 4.56.5, it must be noted that the document does not evidence any agreed procedure that required the use of a hot line at the time of incident. Similarly, the point about the consequences of not calling on the ECAS designated hotline does not appear to be borne out by the facts. The IRCG did not call on the line that had been circulated in 2017, but the IRCG did in fact communicate with two lead operators who could have relayed the information from the ES caller. Both insist they did listen to the initial part of the call. The limitation on the functions of ECAS with regard to tracing the location of a caller is not consistent with the context of the ECAS/CHP policy provided.

- 4.59 Section 3.1 of the ECAS/CHP Part 2 provides that the ECAS operators are instructed to proactively offer or, strongly recommend that the recording is played to the emergency service in clear terms once it is felt that it would be beneficial to the ES. The ECAS operator at Navan (“A”) who transferred the emergency call to the Coast Guard was aware that this was a genuine distress call and heard the words “boats sinking” and “off Malin Head” before the call was transferred to the Coast Guard. When the Coast Guard operator ended the call the possibility of replaying the first 30/45 seconds back was lost by that ECAS operator. The operator therefore advised the lead operator. It is not credible that this was done only to ensure that the mobile phone number was available as the IRCG had that number. It seems more probably that this occurred because it reflected the substance of the ECAS/CHP policy because A was aware that the IRCG (“B”) had not heard the initial part of the call from Crewmember No 1.
- 4.60 No ECAS witness mentioned either the content of the CHP policy, or the content of the particular section in their Garda statements or to the MCIB prior to submissions on the first draft report.
- 4.61 ECAS did not verbally pass all the details of the call to the IRCG. ECAS has submitted (addressed in more detail below) that they provided all information requested by the IRCG.
- 4.62 The IRCG has responded to the submission about tasking SAR operations below.

Relevant IRCG Procedures

4.63 The only applicable written document at the time from the IRCG was an Aide Memoire (at Appendix 7.15) directed to IRCG personnel, provides as follows :

"A 999/112 call indicates that someone is reporting an emergency situation and requires immediate attention.

Checklist (for incident evaluation)

- *WHO is making the 999 Call* *name;*
- *CALL-BACK NUMBER* *number ;*
- *TIME of OCCURRENCE* *time (Datum Time for the Incident);*
- *LOCATION* *identifiable location, grid reference or lat and long;*
- *INCIDENT DETAILS* *full details necessary to pursue the incident before terminating the call;*
- *PERSONS AT RISK* *numbers involved (POB);*
- *a call should always be answered with "Dublin Coast Guard"; "Malinhead Coast Guard", "Valentia Coast Guard" as appropriate.*
- *consider asking the first informant to remain on scene and monitor the situation stressing that they must not place themselves at risk.*
- *does the call back number agree with what the operator has;*
- *is it practical to send a Coast Guard Volunteer to meet the first informant;*
- *remember, the call could be for another centre or for the Gardaí or other rescue authority - The 999 Operator may remain on the line throughout the call and can give location advice and also can assist with transfer of a call to another location or to another service if so requested.*
- *ensure you have all the information you need to pursue the incident, before terminating the call;*

It is the responsibility of the co-ordination centre (not the Call Handling Centre) to obtain adequate address and call-back details and incident location information from the caller and / or the operator, to ensure that the incident being reported can be located;"

4.64 The IRCG says that it had no written procedures in place with ECAS in July 2018. ECAS says procedures were provided in 2011. The MCIB has not been advised if ECAS/SUP/SO47 version 13 has been agreed with the IRCG. No document with its contents (or referring to it) was provided to the MCIB. The IRCG policy finalised after the incident was created in consultation with ECAS. The IRCG advised that other information pertaining to ECAS procedures were and are relayed via the

DCCAE hosted Emergency Service Forum, where information between ECAS and Emergency Services is exchanged.

- 4.65 At the time of the incident, IRCG was upgrading its operations logging equipment to enable more effective processing of AML (Automatic Mobile Location) calls. The IRCG procedure for handling emergency calls from 26 July 2018 was **IRCG SAR OPS Notice 5/18** dated 26 July 2018 (“SOP 5/18”) (see Appendix 7.14). SOP 5/18 was initially prepared to set out arrangements for processing AML calls. IRCG confirms that ECAS was consulted on the drafting of this SOP. This was the first occasion upon which IRCG referred to the term ‘Hotline’. Prior to that each RCC had dedicated ECAS contact numbers that were understood to be supervisor contact numbers.
- 4.66 In the immediate aftermath of the incident, IRCG included call handling arrangements in this SOP and in its subsequent replacement **IRCG SAR OPS Notice 7/18**.

IRCG SAR OPS Notice 5/18

- 4.67 The IRCG procedural document SAR OPS 5/18 was completed after the incident but has some relevance in clarifying what technical features were available at the time and the importance of obtaining location information. It provides that *‘the ECAS operator stays on the line until they are satisfied that the call is being appropriately managed by the selected service’*.
- 4.68 SAR OPS 5/18 also sets out the difference between AML and non AML phones in relation to being able to trace the location of the caller:

5. Calls received by ECAS from international mobile providers, do NOT provide AML data. (including Britain and NI).

7. Calls made to ECAS from non AML enabled phones will provide location of the mobile cell antenna. The log also displays the approximate area coverage for that mobile cell and a bearing which is the direction of coverage of the beam from the mast. No indication of beam width is provided, so the information is of little help in determining the caller’s precise location. ECAS experience has shown that callers can be situated outside the “advertised” area of coverage provided by the mobile network operator.

- 4.69 SAR OPS 5/18 sets out a process where there is limited information provided:

10. Situations can arise, whereby connected calls do not generate any or sufficient information with regard to the nature of the emergency or in the case of non-AML phones, the location of the emergency. In such situations there are a number of possible options to be exercised by the RCC:

- a. *If a call is disconnected soon after being connected, or at an early stage of the conversation, the ECAS operator should still be on the line and the operator should be asked to provide any relevant information that was provided including prior to the call being connected to IRCG.*
- b. *The operator has the capacity to replay the first 45 seconds of the emergency call which will include the portion of the call with ECAS prior to it being connected to the RCC. If there is confusion as to the caller's situation, this facility should be availed of and requested, as there can often be valuable information revealed in the "second listen" with 2 people listening.*
- c. *WOs (watch officer) should try calling back the number of the caller, which may or may not elicit a result.*
- d. *ECAS should be contacted on Hotline number 01 xxxxxx in circumstances where WOs require additional information with regard to incomplete calls or supporting information.*
 - i. *ECAS for technical reasons do not have a capacity to replay an emergency call "down the line" on the hotline (or any other call) from the RCC. The lead operator can listen to the emergency call, note any information and then relay this to the RCC operator on the hotline call.*
 - ii. *In such circumstances it would be important to ascertain what information was provided that resulted in the call being connected to IRCG as with any other information that was obtained in relation to the caller's situation.*

ECAS Hotline and other ECAS Information

11. *Any operational queries to ECAS should only be raised on the ECAS HOTLINE NUMBER 01 xxxxxx. Operational queries should NOT be raised with individual ECAS centres via their PSTN lines.*
 - a. *PSTN lines are for backup use only and should only be used in the event that the ECAS cannot be contacted on the Hotline number.*

4.70 The content of the IRCG SAR OPS 5/18 therefore broadly reflects what is in ECAS /SUP/SO47 but only in, and from, version 13 of the latter which dates from 2019.¹² Once the initial call from ECAS to the emergency service had ended the ECAS operator could not retrieve the recording. The recording of the full call was stored on a server immediately accessible by an ECAS lead operator who could listen to it but not play it back down the phone line. This facility could only be used after the emergency caller has cleared the line.

12. While noting the difference in the procedures as to the length of the call that can be replayed: 45 secs v 30 secs.

13. Version 10 does not contain the same language on the conditions attaching to any play back that appear in version 13.

No evidence has been provided to show any agreement on the requirement for the use by the IRCG of a hotline number in July 2018.

- 4.71 ECAS procedures for call handling instruct the ECAS operator to insist that the emergency service listen to the recording in cases where the ECAS operator is of the view that the emergency service does not get enough information (see Appendix 7.11). The initial operator who transfers a call is empowered to speak up if they thought there was a problem with the call.
- 4.72 From the IRCG recording of the emergency call only warbling sounds can be heard. The IRCG operator “B”, ended the call because he thought the ECAS operator had disconnected when they did not reply to him. From the perspective of the IRCG, the follow up calls between the IRCG and the ECAS (Navan and Ballyshannon) did not clarify the location of the casualty because an UK mobile was used and the Automatic Mobile Location (“AML”) facility is only available on Irish Mobiles. A non AML call would generate a 2% location confidence level on the log display indicating the very low level of confidence in the location position, an AML caller would have 60% location confidence level. The follow up calls did not indicate the type of casualty or the seriousness of the distress situation, and the nature of the distress on the sea. Only the Casualty phone number and the location of the mast receiving the call was ascertained. This mast was at Malin Head - Ballykenny in Donegal and its coverage is over a wide area of sea either side of the Malin Head Peninsula.
- 4.73 With regard to the IRCG Aide Memoire in place at the time of the accident, the IRCG operator who received the initial call followed the instruction. IRCG(“B”) was on the line for a total of 41 seconds i.e. 37 seconds hailing the caller and a further 4 seconds endeavouring to speak to an ECAS operator. No conversation whatsoever took place from Crewmember No. 1 during this period. The IRCG operator made subsequent efforts to call the number back and placed a follow up call with ECAS, and the ECAS centre in Navan made contact with MRSC Malin.
- 4.74 The IRCG knew that once the initial call had been disconnected the ECAS operator could not play the recording back over the phone line. The IRCG believed (incorrectly) that the recording was then on a server not readily available and the ECAS lead operators did not have access to it and could not convey the contents to the IRCG.
- 4.75 The ECAS operator at Navan who transferred the emergency call to the Coast Guard was aware that this was a genuine distress and heard the words “*boats sinking*” and “*off Malin Head*” before the call was transferred to the Coast Guard. When the Coast Guard operator ended the call the possibility of replaying the first 30 (45) seconds back was lost by that ECAS operator. The ECAS operators are instructed to proactively offer that the recording is played to the emergency service.

- 4.76 The IRCG does not have any written criteria as to the tasking of SAR assets. The minimum requirement would include an approximate location and type of casualty, i.e. what are the SAR units looking for. In this case the only information was a mast on Malin Head with a 20 km radius and no information as to casualty type. This was not considered enough to task SAR units. There was also not enough information to formulate an emergency or distress message over the VHF. MRSC Malin routinely processes many land based responses so there was nothing to indicate that the call originated from sea or was a specific location provided.
- 4.77 When the full recording was received from ECAS and listened to by the IRCG they stated that if they had heard the recording or been told that the caller said “off Malin Head” and “boat sinking” they probably would have tasked SAR assets on that information as the information put the caller close to Malin Head and they would have been looking for persons in the water.
- 4.78 While ECAS raise an issue about the correct use of the IRCG in relation to the telephone line it used to make a call back to ECAS, nothing appears to arise from that as the IRCG did in fact talk to the correct ECAS operator. 3 persons in ECAS say they listened to the call but the essential information and character of the call was not relayed to the IRCG.
- 4.79 The position of ECAS as to its role in relation to locating callers is not consistent with at least some of its procedures which do reflect an understanding as to a more active role in location identification. ECAS operators were aware of the limitations of a UK mobile phone to provide location details, and that the coverage of the Malin Head mast was large. Therefore identifying the requirement for the IRCG, that the caller was on the water in a boat that was sinking off Malin Head would all have been relevant in the location identification.
- 4.80 The IRCG also recognised it needed to ascertain location information and to ensure that it had all available information. The IRCG had tried to talk to the ECAS lead operator but got no answer and hence thought the entire call was concluded. On a reasonable analysis of the calls the IRCG did believe it had all information (after the 2 later calls), and did not know that there had been words spoken by the caller, hence, did not ask for the call to be listened to again.
- 4.81 Had the IRCG had a more specific policy and clearer knowledge of the ECAS play back facilities (as later set out in SAR OPS 5/18) it is likely that the IRCG operator would have expressly asked for the earlier part of the call either if the ECAS operator was still on the line, or by means of a subsequent call. This would have mirrored the ECAS policy which pre-existed the incident and would have provided a second layer of checking for location advice.

- 4.82 Since this incident the Coast Guard has reported to the MCIB that it has revised protocols (see Appendix 7.14) for handling emergency calls. In particular, the necessity for keeping the call live so the first 45 seconds can be replayed to them and the use of the Hotline for contact between the Coast Guard and ECAS where there are issues regarding information exchanged.
- 4.83 The MCIB notes the revised protocols, however, it is not the role of the MCIB to assess the adequacy of same.
- 4.84 The MCIB notes and welcomes the recent developments in enhancing SAR in Ireland and the publication of a National Search and Rescue Plan by the Minister of State with responsibility for Maritime Transport, Department of Transport, and that this was in part in response to a previous MCIB report and recommendations. The MCIB considers that this new approach being adopted including a National SAR Plan, Assurance Mechanisms and a new National SAR Committee provides an opportunity to consider and address the issues raised in this report.

5. CONCLUSIONS

- 5.1 The crew had not planned the voyage sufficiently and were not prepared for this emergency. (CoP, the Safe Operation of Recreational Craft, Sections 2 and 11)
- 5.2 During the incident the crew's actions exacerbated the severity of the incident. Anchoring this type of craft by the stern made it much more susceptible to swamping in any type of sea. (CoP, The Safe Operation of Recreational Craft, Appendix 4, Dangers involved in Anchoring.)
- 5.3 An effective method of indicating distress was not aboard the vessel. A mobile phone should not be relied on as the primary method of contacting the emergency services. (CoP, The Safe Operation of Recreational Craft, Sections 2 and 11)
- 5.4 After the 10:16 hrs. emergency call the Coast Guard acted in accordance with the information it had to hand. The information it had regarding the incident, according to the IRCG, was insufficient to task assets for a search.
- 5.5 There was enough information in the ECAS recording of the emergency call for the IRCG to initiate SAR operations shortly after 10:16 hrs. This information was not transferred to the Coast Guard due to:
 - (i) The operators at the Coast Guard on the initial emergency call not receiving sufficient information to commence a SAR operation.
 - (ii) Restrictive procedures in ECAS which were not sufficiently flexible for a situation which required the ECAS operators to be more proactive in transferring all the information available to the Coast Guard.
- 5.6 Because the information in the recording of the emergency call was not transferred shortly after 10:16 hrs. the Casualties were in the water for 5 hours. This increased the severity of the incident.
- 5.7 Marine communications are very different from land-based communications and the ECAS system is a land-based emergency call answering system with limitations for use at sea.

6. SAFETY RECOMMENDATIONS

- 6.1 All owners and users of recreational vessels should comply with the Code of Practice (CoP): The Safe Operation of Recreational Craft which is published by the Department of Transport.
- 6.2 The Minister for Transport should consider issuing a Marine Notice to draw attention to the CoP for the Safe Operation of Recreational Craft. Particular attention should be directed to Chapter 11 of the Code relating to Emergency Procedures. It is essential that the use of VHF radio as the primary means of contacting emergency services be impressed upon all boat owners and that VHF radios should be used in all instances, including in competitive sailing events. Note: The MCIB has already issued a letter to the previous Minister for Transport regarding an early recommendation on this issue.

IRCG and ECAS

- 6.3 As set out above in part 4, since this incident the IRCG has protocols for handling emergency calls. ECAS has also updated policies. The Minister for Climate Action, Communication Networks and Transport should consider whether the IRCG and ECAS should have these policies, their implementation internally, and their co-ordination with each other, suitably reviewed and or audited.
- 6.4 The ECAS system and its role in maritime SAR should be considered in light of the recent developments in enhancing SAR (including AML functionality in Ireland for foreign registered mobile phones), in particular the role of ECAS in communicating all information from an emergency call.
- 6.5 The Minister for Climate Action and Communication Networks should ensure that the issues raised in this report in relation to the ECAS system and its interface with the IRCG be addressed.
- 6.6 The MCIB notes the recent publication of the first report from the National Search and Rescue Plan by the Minister of State with responsibility for Maritime Transport, Department of Transport.
See at
https://merriionstreet.ie/en/News-Room/Releases/NSP_Annual_Report.pdf.

The MCIB welcomes the report and notes the areas identified for further work at part 6 of the report which include the identification by the SAR Consultative Committee as one of its three priorities *"to further develop: Incident Management (interagency), ensuring clarity and a common approach through facilitating close collaboration in exercising; Clarity of roles"*.

The Health and Safety Forum also identified priorities including:

"The research and development of a Dynamic Risk Assessment methodology applicable to Search and Rescue activities from an operational perspective; and

It is a matter for the relevant Ministers to consider whether the National Search and Rescue Plan mechanisms should consider and address the issues raised in this report.

7. APPENDICES

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Appendix 7.1 Photographs



Photograph No.1 - The boat from astern - note height of transom in way of outboard.



Photograph No.2 - The boat port side.

Appendix 7.1 Photographs



Photograph No.3 - *The threaded end of the fuel line & the spare battery.*



Photograph No.4 - *Sign on pier at Portronan.*

Appendix 7.2 Location Diagrams



Diagram 1



Diagram 2

Appendix 7.3 Met Éireann Weather Forecast



Met Éireann

The Irish Meteorological Service

Climate Services
Glasnevin Hill
Dublin 9

Seirbhísí Aeráide
Cnoc Ghlas Naíon
Baile Átha Cliath 9



Our Ref. [REDACTED]
Your Ref. MCIB/12/280

Re: Estimate of weather & sea state conditions in the White Strand Bay area off the coast of Portronan Co Donegal (incident position 55 21.43N 007 22.69W) on Tuesday 17 July 2018 between 06:00hrs and 18:00hrs Local Time (=UTC+1)

Synopsis: A slack west to southwesterly airflow covered the country with a weak frontal trough (occlusion) embedded in the flow.

17 July 2018 from 06:00 – 12:00 hrs Local Time (=UTC+1)	
<u>Weather:</u>	Cloudy with scattered passing showers, most showers were light however the odd shower was heavy and squally. The estimated rainfall total for this 6 hour period: between 1.5mm and 2.5mm.
<u>Temperature:</u>	Air temperatures of 13 to 16 degrees Celsius. Sea temperature of 14 or 15 degrees Celsius.
<u>Wind:</u>	Mostly light Force 3 occasionally moderate Force 4 from a southwest or westerly direction (mean speed of 5 to 12 knots) with gusts up to 15 knots near showers.
<u>Visibility:</u>	Mostly good (more than 5 nautical miles), occasionally moderate (between 2 and 5 nautical miles) in showers.
<u>Sea State:</u>	Moderate with total combined wave height of approximately 1.5 to 2 metres mainly due to a westerly swell to which the White Strand Bay area is exposed to.

17 July 2018 from 12:00 – 18:00 hrs Local Time (=UTC+1)	
<u>Weather:</u>	Mostly cloudy with sunny spells and isolated light passing showers. The estimated rainfall total for this 6 hour period: less than 1mm.
<u>Temperature:</u>	Air temperature of 14 to 16 degrees Celsius. Sea temperature of 14 or 15 degrees Celsius.
<u>Wind:</u>	Light breeze Force 3 or less from westerly direction for a time, then variable and easterly at the end of the period (mean speed of 4 to 8 knots)
<u>Visibility:</u>	Good (more than 5 nautical miles)
<u>Sea State:</u>	Slight to moderate with total combined wave height of approximately 1 to 1.8 metres mainly due to a westerly swell to which the White Strand Bay area is exposed to.

Please address all correspondence to [REDACTED] and please kindly quote the reference number [REDACTED]



Appendix 7.3 Met Éireann Weather Forecast



Met Éireann

The Irish Meteorological Service

Climate Services

Glasnevin Hill

Dublin 9

Seirbhísí Aeráide

Cnoc Ghlas Naíon

Baile Átha Cliath 9



Weather Forecast From Met Éireann

24-hour Sea Area Forecast

Updated at 0000 / 0600 / 1200 / 1800

Sea Area Forecast until 0600 Wednesday, 18 July 2018
Issued at 0600 Tuesday, 17 July 2018

1. Gale warning: Nil
Small craft warning: Nil

2. Meteorological situation at 0300: A slack westerly airflow covers Ireland. Frontal troughs, associated with low pressure in the North Atlantic, will track in across the country at times.

3. Forecast for Irish coastal waters from Roches Point to Erris Head to Belfast Lough

Wind: West to southwest force 2 to 4, veering west to northwest or variable this afternoon, slackest across for north and northwest sea areas.

Forecast for Irish coastal waters from Belfast Lough to Hook Head to Roches Point and for the Irish Sea

Wind: West to southwest force 2 to 4. Becoming south to southwest and increasing force 4 or 5 Tuesday afternoon. Later becoming northwesterly for southern sea areas and variable force 2 to 4 elsewhere.

Weather for all Irish coastal waters and the Irish Sea: Generally fair. Well scattered showers and isolated mist patches.

Visibility for all Irish coastal waters and the Irish Sea: Generally good.

Warning of Heavy Swell: Nil

4. Outlook for a further 24 hours until 0600 Thursday 19 July 2018: Light to moderate variable mainly westerly winds. Mainly fair with just well scattered showers.

Text of Gale Warning
Nil

Text of Small Craft Warning
Nil

Coastal Reports	5 AM Tuesday, 17 July 2018
Malin Head Automatic	Southwest, 8 Knots, Cloudy, 8 Miles, 1012, Steady
Dublin Airport	West, 5 Knots, Cloudy, 21 Miles, 1014, Steady
Buoy M6 51° 41'N 6° 42'W	Northwest, 8 Knots, Wave height not available, The visibility at Tuskar is greater than 10 Miles, 1015, Steady
Roches Point Automatic	West, 4 Knots, Cloudy, 26 Miles, 1015, Steady
Sherkin Island Automatic	West, 5 Knots, Cloudy, 14 Miles, 1015, Falling slowly
Valentia Automatic	South, 5 Knots, Cloudy, 24 Miles, 1015, Falling slowly
Mace Head Automatic	North, 2 Knots, Cloudy, 18 Miles, 1013, Falling slowly
Belmullet Automatic	South-Southwest, 4 Knots, Cloudy, 5 Miles, 1013, Falling slowly
Buoy M1 53° 8'N, 11° 12'W	Report not available
Buoy M2 53° 29'N, 5° 26'W	Report not available
Buoy M3 51° 13'N, 10° 33'W	West-Southwest, 7 Knots, Wave ht: 2.7 m, 1015, Falling slowly
Buoy M4 55° 0'N 10° 0'W	West-Southwest, 8 Knots, Wave ht: 2.2 m, 1012, Steady
Buoy M6 53° 4'N 15° 56'W	Northwest, 15 Knots, Wave ht: 1.9 m, 1013, Steady

Disclaimer: buoy locations are approximate and are not for navigational purposes

Sea Crossings	State of sea until 0600 Thursday 19 July 2018
Dublin - Holyhead	Wavelets or slight.
Rosslare - South Wales	Slight to moderate reducing slight Tuesday morning.
Cork - South Wales	Slight to moderate reducing slight Tuesday morning.
Rosslare - France	Moderate reducing slight Wednesday morning.
Cork - France	Moderate reducing slight Wednesday morning.

Next update before 1300 Tuesday, 17 July 2018

A detailed forecast may be obtained by dialing *Weatherdial* on 1550 123 855.



Appendix 7.4 Situation Report

SITUATION REPORT

From: MRSC MALIN Sent: 17 July 2018 17:47 To: MRSC Malin Sitreps Cc: [REDACTED]
[REDACTED] Subject: SITREP ONE

7/17/2018 Overseas

MAR SAR - PIW - MALIN HEAD UIIN1528/18 MRSC Malin

SITREPs SITREP1/UIIN1528/18 Transmission URGENCY Entry Date 17 1619Z Jul 18
From MRSC Malin

To MRSC MALIN SITREP GROUP

SITREP Number ONE

Incident MAR SAR - PIW - MALIN HEAD Reference Number SITREP1/UIIN1528/18 A.
ID of Casualty PLEASURE CRAFT GENERIC B. Position 55°17.09N 007°28.68W

C. Situation UPTURNED BOAT WEST PORTRONAN

D. Number of Persons 3 E. Assistance Required RECOVER CASUALTY, SEARCH FOR
MISSING CASUALTIES F. Coordinating RCC MRSC Malin G. Description of Casualty
Motor/Sailing boat vessel H. Weather On Scene Wind: 2, W / Sea: Moderate / Swell: Low
wave / Air Temp: 14.399951934814453°C / Water Temp: 16.0°C / Vis: Good / Cloud
Cover: Overcast / Precip: No rain J. Initial Actions Taken TASKED R118, GREENCASTLE
CG

<https://outlook.live.com/mail/AQMkADAwATM3ZmYAZS0wNGRiLWJINDMtMDACLTAwCgA...>

4 of 6 28/05/2019, 12:18

REQUEST LOUGH SWILLY RNLI K. Search Area PORTRONAN MALIN HEAD L.
Coordinating Instructions RECOVER CASUALTY, LOCATE MISSING CASUALTIES M.
Future Plans N/A N. Additional Information 1430 CALL REGARDING PIW WESTOWN
1432 TASKED GREENCASTLE CG/ R118 1434 REQUEST LOUGH SWILLY RNLI

1451 MOP ADVISES FV HAS LIFTED CASUALTY

1500 CONFIRMED ONE CASUALTY EN ROUTE TO PIER STILL 2 MISSING
UPTURNED

PLEASURE CRAFT

1500 UPGRADED TO MAYDAY

1506 R118 ON SCENE COMMENCE WINCHING CASUALTY 1519/1530 EN ROUTE TO
ANTNEGALVIN WITH 1 CASUALTY/ LANDED AT HOSPITAL 1528 LOUGH SWILLY
RNLI AND GREENCASTLE CGU ON SCENE COMMENCE

SEARCH

1545 R118 HDG TO EGLINGTON TO REFUEL

1552 LOUGH SWILLY RNLI ADVISES 1 MISSING CASUALTY IS ON ROCKS AT
SHORE

BREASTY BAY

1620 R118 BACK ON SCENE

1643 CASUALTY MUST BE EXTRACTED FROM SHORE R118 UNABLE TO WINCH
DUE TO WX AND FUEL/ ALL APPROPRIATE AUTHORITIES ADVISED ****

Appendix 7.5 List of calls on 17th July 2018

List of calls on 17th July 2018

TIME	FROM	TO	
10:16	Casualty Mobile	ECAS	Original 999 call (Handled by A)
10:16	IRCG Malin Head	Casualty Mobile	Voicemail
10:18	IRCG Malin Head	Casualty Mobile	Voicemail
10:20	IRCG Malin Head	Casualty Mobile	Voicemail
10:20	IRCG Malin Head	ECAS Ballyshannon	Requesting information – ECAS to call back after looking at file (B phoned C)
10:21	IRCG Malin Head	Casualty Mobile	Voicemail
10:22	IRCG Malin Head	Casualty Mobile	Voicemail
10:22	ECAS Navan	IRCG Malin Head	Checking if IRCG had the number of the casualty. (D phoned B)
10:23	ECAS Ballyshannon	IRCG Malin Head	Returning call, different operator at Malin Hd, said had been speaking with ECAS Navan – no further info passed. (C phoned E)
10:25	IRCG Malin Head	Casualty Mobile	Voicemail
10:26	IRCG Malin Head	Casualty Mobile	Voicemail
10:29	IRCG Malin Head	Casualty Mobile	Voicemail
10:31	IRCG Malin Head	Casualty Mobile	Voicemail
10:40	IRCG Malin Head	Casualty Mobile	Voicemail
10:41	IRCG Malin Head	Casualty Mobile	Voicemail

Appendix 7.6 Statement to Gardai by ECAS operator "A"

I hereby declare that this statement is true to the best of my knowledge and belief and that I make it knowing that if it is tendered in evidence I will be liable to prosecution if I state in it anything which I know to be false or do not believe to be true.

My name is _____ and I reside at the above address. I have worked as a call taker at ECAS Navan for the past eight and a half years. I have worked in the centre since it opened in 2010. I recall Tuesday the 17th July 2018. I was working the 7:30am to 7:30pm shift. Sometime that morning, I'm not sure of the exact time I remember getting a phone call through the system. I recall it was an English mobile number, because it was an English mobile it gave me very little information but it stated that the call was coming from a mast located in north Donegal. I answered the phone "emergency services, do you need the Garda, fire brigade, ambulance or Coast Guard. When I answered the phone I could hear shouting and conversation. I knew there was someone on the phone but they didn't respond so I repeated the message again and this time a male spoke back and he shouted Coast Guard. I heard him mention Malin Head and he said "sinking". I think it was him or it could have been another person in the background. I could hear a number of voices in the background, it wasn't just one person. When the caller requested Coast Guard I put him through to the Coast Guard and the call went directly to Malin Head Coast Guard station. The technology we use directs the calls to their local emergency service, so as the call came from Donegal it automatically goes through to the local Coast Guard which was Malin Head. The Coast Guard answered and I told him "ECAS connect on a foreign mobile". When I said this the Coast Guard then takes over the call. The coast Guard took the call but I remained online as per our regulations. I mute the call but I stay on to assist if needs be. When this occurs we are not allowed to interrupt the call unless we are requested. When the call was transferred I heard the phone line go odd and the Coast Guard wasn't getting any response, the Coast Guard hung up. Up until the time the Coast Guard hung up I was still online. When the Coast Guard terminated the call I remained live but the mobile was gone. I hung up and I immediately informed the lead operator

_____ and I said to her "could you listen to that call to make sure the Coast Guard got it, phone them to make sure they have the right number". I was concerned enough from the call to raise this. Sc _____ came over and listened to the call and she called the Coast Guard back to make sure they had the right mobile to contact them back. When _____ phoned the Coast Guard he stated that he had been on to ECAS at Ballyshannon. They would also have had access to the call. The Coast Guard did not request a playback; we have a facility to play a 30 second playback but once the Coast Guard terminated the call the opportunity for me personally to play the playback is gone. Once I had concerns about the call I phone it on to my immediate supervisor as per my training. I had no further dealing with the call. This statement has been read over to me by Garda _____ and it is correct. I have been invited to make any additions or corrections but I do not wish to do so.

Signed: _____

Witnessed: (_____

Appendix 7.7 Statement to Gardai by ECAS operator “C”

I hereby declare that this statement is true to the best of my knowledge and belief and that I make it knowing that if it is tendered in evidence I will be liable to prosecution if I state in it anything which I know to be false or do not believe to be true.

My name is [redacted] and I work as an emergency call taker at ECAS, Ballyshannon. I recall Tuesday the 17th July 2018. That morning I was covering a break at the call centre. The phone rang and it was Malin Head Coast Guard. I don't recall the name. The Coast Guard asked regarding a specific call that they had received. As far as I can remember they would have had a mobile number or a location, I can't remember the details exactly. I would have brought up the call on a computer in the office and I brought the call up and listened and to be honest I can't remember exactly what I said but I passed over the relevant details that I heard on the call. The Coast Guard didn't look for any further details and he didn't request a playback. The call was short possibly not even a couple of minutes in length. That was the last I heard about it then until a couple of weeks later when the manager told me about it and that there maybe someone in to speak with me. This statement has been read over to me by Garda [redacted] and it is correct. I do not wish to make any further changes, additions or alterations.

Signed: [redacted]

Witnessed: [redacted]

Appendix 7.8 ECAS Event Log Ballyshannon Operator “C”

The screenshot shows a web application interface for an event log. At the top, a breadcrumb trail reads "ECAS > Event Log > Event Log > Malin Head Coastguard". Below this is a yellow header bar with the title "Event Log: Malin Head Coastguard" and a "Close" button on the right. A toolbar contains icons for "New Item", "Edit Item", "Delete Item", "Workflows", and "Alert Me". The main content area displays a table with the following details:

Date Event	17/07/2018 10:25
Subject	Malin Head Coastguard
Category	Low
Description	██████████ from Malin Head Coastguard rang enquiring about a call. Listened to the call and passed over all details needed. The CLI was ██████████
Status	Active

At the bottom, the creation and modification metadata is shown: "Created at 17/07/2018 10:27 by Control Point Ballyshannon" and "Last modified at 17/07/2018 10:27 by Control Point Ballyshannon", with a "Close" button to the right.

Appendix 7.9 Statement to Gardai by ECAS operator “D”

I hereby declare that this statement is true to the best of my knowledge and belief and that I make it knowing that if it is tendered in evidence I will be liable to prosecution if I state in it anything which I know to be false or do not believe to be true.

My name is _____ and I reside at the above address. I work as an emergency call operator at ECAS at Navan. I have worked here for approximately 2½ years. I recall Tuesday the 17th July 2018. That morning I'm unsure of the time I had finished a call when I was contacted by my colleague, _____ and she requested that I listen to her last call. She said that the caller sounded very distressed and she wanted the Coast Guard to know it was a genuine emergency. At this stage Ali had finished the call. Once the conversation is ended the phone call is gone off your screen and the call is gone. So straight away I went over to her control point, I searched her last call and I listened to it. I listened to the call and I remember that it sounded very windy and you could tell he was on the sea. So I rang Malin Head Coast Guard control post and I rang them directly. I said my colleague had a phone call a few minutes ago and the caller seemed distressed. I told him that I wanted to make sure that you have the right phone number. The Coast Guard informed me that he had taken the call and that he had been in contact with ECAS Ballyshannon as he thought they were lead centre. I told him that I wanted to confirm that the mobile number he had was correct so I read over the number to him. I recall it was English mobile. He asked me had I a location for the call and I told him that all I had on my screen was Malin Head, Donegal. He said he had tried to phone the number back which made the call but it went straight to voicemail. That was it basically. I had no further dealings with the call after that. Once a call is made to us the following is logged, phone number, location, duration of call and what time the call is made. These are the only details available to me when the call is disconnected. This statement has been read over to me by Garda _____ and it is correct. I have been invited to make any additions, alterations or corrections but I do not wish to do so.

Signed: _____

Witnessed: _____

Appendix 7.10 ECAS Event Log Navan Operator “D”

The screenshot shows a web interface for an event log. At the top, a breadcrumb trail reads "ECAS > Event Log > Event Log > Coast Guard". Below this is a yellow header bar with the title "Event Log: Coast Guard" and a "Close" button on the right. A toolbar contains icons for "New Item", "Edit Item", "Delete Item", "Workflows", and "Alert Me". The main content is a table with the following fields:

Date Event	17/07/2018 10:25
Subject	Coast Guard
Category	Low Window Snip
Description	Rang [REDACTED] in Malin Head Coast Guard to ensure that a callers number and location was passed over correctly as line was very bad. Coast Guard said he rang Ballyshannon and asked for details.
Status	Active

At the bottom, it states "Created at 17/07/2018 10:30 by Control Point Navan" and "Last modified at 17/07/2018 10:30 by Control Point Navan", with a "Close" button on the right.

Appendix 7.11 ECAS/CHP/B002-P1 (6/04/17) - relevant extract

2.5. Monitoring of Emergency Calls

During emergency call handling, and only where specified in procedure, operators will need to monitor certain call types. Call monitoring is split into three types:

- Monitoring Type A = A call routed to an emergency service is monitored for its entire duration. Calls that are monitored for the entire duration are Children Playing calls, distressed callers and when requested to do so by the emergency services.
- Monitoring Type B = Monitoring is terminated when the case location has been identified by the ES and confirmed by the caller.

When connecting a call to the Garda, Fire or Ambulance (excluding Dublin) the call is monitored until the county and/or town is identified by the caller and acknowledged by the ES call taker.

Exception to the rule

There are two situations where we ask operators to monitor calls differently:

- Dublin Ambulance
- Coastguard

In all of these situations the operator must remain on the call until the entire address has been given and it is clear the ES has moved on to discuss the details of the call. Examples of this would be the ES saying – “what is the problem”, “can you repeat your phone number”.

If the call is routed to the Garda and they are discussing the incident and no location is forthcoming, after 20 seconds of a 2 way conversation, type in NL and relinquish.

In the unlikely event of monitoring an ambulance or fire call where the location has not been discussed after 5 minutes, notify the lead operator, who will then ring the ES concerned to ascertain if you are required to remain on the call.

If monitoring is terminated without sufficient evidence that the call was routed to the correct control room, the call will be deemed as under-monitored. If monitoring continues beyond the point where it is obvious that the ES has taken control of the call and the operator can add no other value, this will be deemed as over-monitored unless the operator has a valid reason to remain on the call.

It is sufficient to have only the initial of the ES requested and the county and/or town typed into the Remarks field. No further address details such as house number, street or townland are required. It is important to continue to capture other necessary details such as MM, Multi, NL etc.

- Monitoring Type C = Monitoring is terminated at the point of answer by the emergency service. This type of call monitoring requires that electronic transfer of Case data is in place with the answering emergency service. Monitoring Type C is likely to be introduced at a future point in time when electronic transfer of Case Data to the emergency services is in place

Appendix 7.11 ECAS/CHP/B002-P2 - (6/04/17) - relevant extract**2. Location Information****2.1. Location Verification on Calls from Mobiles and Landline Numbers**

For all emergency calls received:

- Using the information displayed on screen, ask the caller "Do you need (ES requested) in (county)?"

If Yes:

- Connect to the ES numbers shown on screen, and handover as normal.

If No:

If the caller requests Dublin Ambulance then:

- Ask the caller "In which part of Dublin do you need the Ambulance?"
- For Dublin 18 Ambulance requests – Operators must ask "In which part of Dublin 18 do you need the Ambulance?"

In all other cases:

Ask the caller "In which (county) do you need the (ES requested)?"

- Type the response given by the caller in the [SEARCH CRITERIA] and [REMARKS] field.
- If only one match found, this will display the correct area ES connect-to numbers.
- If more than one match is found, verify the correct location with the caller.
- Highlight appropriate area, if possible ensuring the county matches that shown in the [name and address] field.
- Press [ENTER].
- Select the required radio button next to the appropriate ES.
- Press [SET UP DEST].

If caller is unable to confirm location details:

- Connect to the ES numbers shown on screen.
- Hand over call as "ECAS connecting (number or a unique ID) with no confirmed location"
- In cases where An Garda Control Room indicates that they already have the A-party CLI and truncates the handover, the ECAS Operator can press [LISTEN/HOLD] and use monitoring type B to complete the call.
- Type M/M in [REMARKS] field.

To enable an ES to have a clear indication of any discrepancy between a callers's suggested area and system displayed area:

- After typing an area in the [SEARCH CRITERIA] field, check the [name and address] field and [STATUS] field.
- If town/county details match, handover call as normal "ECAS connecting (number)."
- If town/county details do not match, or caller unable to provide details, handover call as "ECAS connecting (number) my records currently show (town/county), caller has advised (town/county)" and if necessary explain to the ES that caller is not sure of exact whereabouts.

Appendix 7.11 ECAS/CHP/B002-P2 - (6/04/17) - relevant extract

- Type M/M in [REMARKS] field and continue as normal.

2.2. Technical Difficulties

On occasion it is not possible to connect to an ES because parts of the SmartStation screen may be greyed out or, occasionally, for other reasons.

- In the first instance the operator should attempt to manually re-route the call using the ES Lookup in the Help/FAQ page within the SharePoint portal
- If an operator experiences a problem that will not allow the operator to manually connect the call say to the caller, "I am having technical difficulties and I have to re-queue your call."
- In the remarks type TECH DIFF.
- Unplug headset.
- Inform a lead operator or manager immediately.
- If you receive a call that has TECH DIFF in the remarks try to handle the call normally.

2.3. No ES Connect to number

If the calling number is displayed but no ES connect-to number appears on screen:

- Ask the caller which County they are calling from.
- Type in the [SEARCH CRITERIA] field.
- Connect call as normal.
- If this fails, go to ES LOOKUP under Help/FAQs on SharePoint.

If the caller OR SmartStation provides location information:

- Use SharePoint to obtain an ES number and connect the call in the normal manner.
- If the call has a unique ID connect, handover to ES and say "ECAS connecting a unique ID".

If the caller OR SmartStation cannot provide location details:

- Type Dublin in the [SEARCH CRITERIA] field, or SharePoint if this fails, to obtain the relevant communications centre in Dublin.
- Using monitoring type B, press [LISTEN] and monitor the call until case location has been passed.
- In order to ensure all calls are connected effectively in circumstances where radio buttons are greyed out a decision tree will be used, see Appendix A.

2.4. Calling Number is Incomplete/Unavailable

If a caller's number is incomplete or unavailable the SmartStation system will automatically create a default CLI (referred to as a unique ID). The [Caller's Number] field will display a number starting 99. This information is used to allow a call to connect, and for the ES if they need to query Location.

- **NOTE:** If no ES Connect-to numbers are displayed, follow section 3.3 No ES Connect to number.
- Otherwise, confirm location with caller as normal.

Appendix 7.11 ECAS/CHP/B002-P2 - (6/04/17) - relevant extract

If the caller doesn't know the county he or she is calling about:

- If available, connect to relevant ES for location shown on SMARTSTATION.
- If no details shown on SMARTSTATION, use [SEARCH CRITERIA] OR SharePoint to obtain the relevant ES Control Centre in Dublin.

When transferring:

- If ES connect-to numbers are displayed, connect the call in the normal way.
- When the ES answers, say "ECAS connecting a unique ID".

NOTE: If connection cannot be made, alert a Manager/Lead Operator.

2.5. Test Calls

An engineer or external agency will state that it is a test call, when you answer:

- Type TEST in [REMARKS] field.
- You may confirm the calling number if given correctly by the engineer (DO NOT read out the calling number to the engineer).
- Ask for the engineer's initials and type in the [REMARKS] field.
- When the engineer replaces their handset press [RELINQUISH].

3. Miscellaneous Procedures

3.1. Call Playback

The workstations automatically records the first 30 seconds of the call. The emergency service may benefit from information mentioned at the start of the call background noises, location information etc. If you feel it would be beneficial to the ES you MUST proactively offer the playback facility. This should only be offered after the caller has cleared. If the ES do not accept the playback and you still feel there is a benefit from the playback you MUST strongly recommend the use of this facility.

To use call playback:

- The ES should be told "This playback facility will not be available when our call has ended."
- Press [Play].
- Type details of the call and CALL PLAYED BACK in the [REMARKS] field.

Offering the playback facility could aid the emergency services in providing help to the emergency caller in a timely manner.

- **NOTE:** Call Playback is no longer available if a call has been slotted.
- The playback on a Represented call will offer the first 30 seconds of the represented call **not** the initial call.

Appendix 7.12 ECAS/SUP/S047 V10



Emergency Call Answering Service (ECAS)

Document Title: *Communications between Emergency Services and ECAS*
ECAS/SUP/S047

Document Issue: *Issue 10*

Approved On: *14/08/2013*



Appendix 7.12 ECAS/SUP/S047 V10



IN CONFIDENCE
 Department of Communications, Energy and Natural Resources
 Emergency Call Answering Service

Emergency Services Engagements with ECAS

DOCUMENT CONTROL

Document Control	
Document Title:	Communications between Emergency Services and ECAS
File Name:	Communications between Emergency Services and ECAS
Issue:	Release v 10
Document owner:	[REDACTED]
Approved On:	14/08/2013

DOCUMENT REVISION CONTROL

Document Revision Control			
Revision	Description of change	Author	Approval Date
Issue 1	Draft	[REDACTED]	06/05/2010
Issue 2	Internal Review	[REDACTED]	06/05/2010
Issue 3	Section 6.1 (Call Recording Request) updated to reflect authorisation signatories for Ambulance Service, Fire Service and Coastguard	[REDACTED]	27/05/2010
Issue 4	Section 6.1 (Call Recording Request) updated to reflect authorisation signatories for Fire Service	[REDACTED]	01/06/2010

Appendix 7.12 ECAS/SUP/S047 V10



IN CONFIDENCE
Department of Communications, Energy and Natural Resources
Emergency Call Answering Service

Emergency Services Engagements with ECAS

Issue 5	<p>Section 3.4 updated to reflect BT Contractual obligations.</p> <p>Section 5.1 updated to reflect all call information including notes being made available</p> <p>Section 5.5 updated to reflect provision of CLI and approximate time of call to better identify call required.</p> <p>Section 6 ECAS Policy and Performance Manager contact address details added.</p> <p>Section 6.1 updated to reflect delivery options for voice recordings.</p>	[REDACTED]	21/06/2010
Issue 6	Section 6.1 (Call Recording Request) updated to reflect authorisation signatories for Irish Coast Guard	[REDACTED]	21/06/2010
Issue 7	Section 2.2 (Contact) and Section 5.3 (Contact) updated to include mobile numbers for Navan and Ballyshannon Control Points	[REDACTED]	04/04/2011
Issue 8	Transfer of document Ownership to ECAS Document Control	[REDACTED]	10/08//2011
Issue 9	<p>Section 3.1 3.2 and 6.1 changed to represent Head of Operations as amalgamation of roles.</p> <p>Section 6 changed to represent how data should be requested, i.e. in writing by e-mail.</p>	[REDACTED]	08/10/2011
10	[REDACTED] now Document owner. Call recording request details updated.	[REDACTED]	14/08/13

Appendix 7.12 ECAS/SUP/S047 V10



IN CONFIDENCE
Department of Communications, Energy and Natural Resources
Emergency Call Answering Service

Emergency Services Engagements with ECAS

DOCUMENT LOCATION

File Location	
Master File Location:	BT Livelink ECAS Folder

COPYRIGHT

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Registered office: Grand Canal Plaza, Upper Grand Canal Street, Dublin 4.

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Appendix 7.12 ECAS/SUP/S047 V10



IN CONFIDENCE
Department of Communications, Energy and Natural Resources
Emergency Call Answering Service

Emergency Services Engagements with ECAS

CONFIDENTIALITY STATEMENT

ECAS Confidentiality

BT recognises the importance of maintaining the confidentiality of all matters related to the handling of Emergency Calls and will ensure that all ECAS personnel comply.

This will be enforced within employee contracts and training and disciplinary action will be taken against any individuals who are proven to be in breach of this requirement. Only authorised personnel will have access to Case Data and all systems that hold this data will be security password protected.

Only authorised personnel within BT will be allowed to communicate with anyone external to the ECAS operation.

Data Protection Act (DPA)

BT in Ireland is subject to obligations under the Data Protection Acts, 1988 and 2003 (as amended from time to time) (the "DPA"). The BT Data Protection Policy sets out guidelines and processes which all employees must comply with on a consistent basis. Awareness of our obligations under the DPA and this Policy is vital for everyone in BT to help protect BT, BT people and BT's customers.

Training will be provided to all ECAS personnel regarding their responsibilities under the DPA and the BT Data Protection Policy and will be refreshed to all ECAS personnel annually.

The website of the Office of the Data Protection Commissioner (An Coimisinéir Cosanta Sonraí) is located at the following URL:

<http://www.dataprotection.ie/ViewDoc.asp?fn=%2Fdocuments%2Flegal%2FLawOnDP%2Ehtm&CatID=94&m=1>

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IN CONFIDENCE
Department of Communications, Energy and Natural Resources
Emergency Call Answering Service

Emergency Services Engagements with ECAS

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Abbreviation	Detail of Acronyms
ECAS	Emergency Call Answering Service

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Emergency Call Answering Service

Emergency Services Engagements with ECAS

1 OVERVIEW

Communications between the Emergency Services and ECAS will form an integral part of the overall 112/999 Service. Given the importance of these communications it is therefore necessary for both ECAS and the Emergency Services to understand the different protocols applicable to the following scenarios

- Emergency Service Unplanned Operational Event
- Emergency Service Planned Operational Change Request
- ECAS call-routing issue
- Emergency Service Active Call Query
- Emergency Service Call Recording Request

The following detailed communication process is simple, structured and flexible to ensure that the best levels of service quality and availability are maintained.

1.1 DOCUMENT PURPOSE

The purpose of this document is to describe the communication process including information flow for the following scenarios

- Emergency Service Unplanned Operational Event
- Emergency Service Planned Operational Change Request
- ECAS call-routing issue
- Emergency Service Active Call Query
- Emergency Service Call Recording Request

1.2 DOCUMENT AUDIENCE AND OBJECTIVES

It is intended for ECAS and the Emergency Services use. It provides guidance for the communication process including information flow which will be an integral part of the overall ECAS Service.

The objectives of this document are to:

1. Provide guidance for communications between Emergency Services and ECAS
2. To ensure that the best levels of service quality and availability are maintained

1.3 DOCUMENT REVIEW

Annually or with design changes

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Emergency Services Engagements with ECAS

2 Emergency Service Unplanned Operational Event

An Emergency Services Unplanned Operational Event will in all likelihood be temporary in nature and will probably result in a temporary change to existing call-routing rules within ECAS. These types of event will most likely require immediate remedial actions to be carried out within ECAS

For example:

- *Emergency Service evacuation of a Control Centre*
- *Delays / re routing of calls to another Emergency Service Control Centre*
- *Spate Conditions*

2.1 COMMUNICATION MODEL

The following simple communication model will be used for Unplanned Operational Events

- Contact
- Verification
- Information Exchange
- Replay & Confirm
- Communicate within ECAS
- Log

2.2 CONTACT

Emergency Service will ring Navan ECAS Centre on telephone number [REDACTED] in the first instance and if this number is not available then mobile telephone number [REDACTED] should be contacted.

In the event that the Navan telephone numbers cannot be contacted the Emergency Service will ring Ballyshannon ECAS Centre on telephone number [REDACTED] in the first instance and if this number is not available then mobile telephone number [REDACTED] should be contacted.

Restrictions and security for the usage of ECAS Centre contact telephone numbers were communicated previously to the Emergency Services.

2.3 VERIFICATION

The above telephone numbers will only be issued to Emergency Services and therefore knowledge of these numbers will verify the caller as a legitimate Emergency Service. The telephone number will be answered by an ECAS Manager.

2.4 INFORMATION EXCHANGE

Emergency Service will explain situation e.g. Evacuation, Spate Condition. The ECAS Manager will inform Emergency Service the current instructions that are recorded and

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Emergency Services Engagements with ECAS

configured within ECAS for the given situation e.g. Evacuation calls will be routed to another designated Control Centre. If no current instructions are recorded are configured within ECAS for the given situation the ECAS Manager will request instructions from Emergency service.

2.5 REPLAY & CONFIRM

ECAS will confirm the Emergency Service making request i.e. Garda , Fire Service, Ambulance Service or Irish Coastguard. ECAS Manager will confirm Emergency Service Control Room making request. ECAS Manager will replay instructions to the Emergency Service. ECAS Manager will confirm that the instructions have been understood.

2.6 LOG

ECAS Manager will log the Emergency Service request.

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3 Emergency Service Planned Operational Change Request

An Emergency Service Planned Operational Change Request will be communicated to ECAS in a timely manner and the implementation of this Change Request will be agreed, planned scheduled with the Emergency Service. These types of event will most likely require permanent configuration changes within ECAS

For example:

- *Emergency Service Border Re-Mapping*
- *Emergency Service Control Room Consolidation*
- *Permanent change to 112/999 telephone number(s)*
- *Permanent change to Critical Contact Numbers*

The following simple communication model will used for Planned Operational Change Request

- Meeting
- Inform ECAS
- Schedule Change
- Implement change

3.1 MEETING

There will regular meetings scheduled with each of the Emergency Services and these meetings may provide a forum for informing ECAS about future Planned Operational Change Requests. The Quarterly ECAS Governance meeting may also be a reasonable forum to inform other Emergency Services of planned Operational Changes which may directly impact Inter-Agency working. If deemed necessary the Emergency Service will schedule a Change Request specific meeting with the ECAS Head of Operations to inform the Planned Operational Change Request.

3.2 INFORM ECAS

Emergency Service will inform ECAS in writing of the Planned Operational Change Request. This notification should be issued to the ECAS Head of Operations.

3.3 SCHEDULE CHANGE

Using impact analysis and a robust Change Control process ECAS will schedule the required change. Emergency Service will be informed that the Change Request has been scheduled.

3.4 IMPLEMENT CHANGE

As per Contract schedule ECAS are contractually obliged to implement required changes. ECAS will inform Emergency Service that the change has been implemented.

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2 Emergency Service Unplanned Operational Event

An Emergency Services Unplanned Operational Event will in all likelihood be temporary in nature and will probably result in a temporary change to existing call-routing rules within ECAS. These types of event will most likely require immediate remedial actions to be carried out within ECAS

For example:

- *Emergency Service evacuation of a Control Centre*
- *Delays / re routing of calls to another Emergency Service Control Centre*
- *Spate Conditions*

2.1 COMMUNICATION MODEL

The following simple communication model will be used for Unplanned Operational Events

- Contact
- Verification
- Information Exchange
- Replay & Confirm
- Communicate within ECAS
- Log

2.2 CONTACT

Emergency Service will ring Navan ECAS Centre on telephone number [REDACTED] in the first instance and if this number is not available then mobile telephone number [REDACTED] should be contacted.

In the event that the Navan telephone numbers cannot be contacted the Emergency Service will ring Ballyshannon ECAS Centre on telephone number [REDACTED] in the first instance and if this number is not available then mobile telephone number [REDACTED] should be contacted.

Restrictions and security for the usage of ECAS Centre contact telephone numbers were communicated previously to the Emergency Services.

2.3 VERIFICATION

The above telephone numbers will only be issued to Emergency Services and therefore knowledge of these numbers will verify the caller as a legitimate Emergency Service. The telephone number will be answered by an ECAS Manager.

2.4 INFORMATION EXCHANGE

Emergency Service will explain situation e.g. Evacuation, Spate Condition. The ECAS Manager will inform Emergency Service the current instructions that are recorded and

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configured within ECAS for the given situation e.g. Evacuation calls will be routed to another designated Control Centre. If no current instructions are recorded are configured within ECAS for the given situation the ECAS Manager will request instructions from Emergency service.

2.5 REPLAY & CONFIRM

ECAS will confirm the Emergency Service making request i.e. Garda , Fire Service, Ambulance Service or Irish Coastguard. ECAS Manager will confirm Emergency Service Control Room making request. ECAS Manager will replay instructions to the Emergency Service. ECAS Manager will confirm that the instructions have been understood.

2.6 LOG

ECAS Manager will log the Emergency Service request.

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4 ECAS Call-Routing Issue

ECAS may have to contact an Emergency Service to inform of a call-routing issue with a particular Control Room

For example:

- *Emergency Service Control Room no answer / engaged*
- *Emergency Service Control Room unavailable*

4.1 COMMUNICATION MODEL

The following simple communication model will be used for unplanned operational events

- Contact
- Verification
- Information Exchange
- Replay & Confirm
- Communicate within ECAS
- Log

4.2 CONTACT

The ECAS Manager will contact the Emergency Service on the previously supplied Critical Contact Number for the relevant Control Room.

4.3 VERIFICATION

The ECAS Manager will verify themselves to the Emergency Services by stating

"This is [ECAS Manager Name] calling from [centre name] needing to speak to the person in-charge in [Emergency Service Control room name]".

4.4 INFORMATION EXCHANGE

ECAS Manager will explain situation e.g. all 112/999 numbers engaged for Control Room. The ECAS Manager will inform Emergency Service the current instructions that are recorded and configured within ECAS for the current situation e.g. Calls should be re-routed to another designated Control Centre. If no current instructions are recorded or configured within ECAS for the given situation the ECAS Manager will request instructions from Emergency service.

4.5 REPLAY & CONFIRM

ECAS will confirm the Emergency Service providing advice i.e. Garda , Fire Service, Ambulance Service or Irish Coastguard. ECAS Manager will confirm Emergency Service

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Control Room providing advice. ECAS Manager will replay instructions to the Emergency Service. ECAS Manager will confirm that the instructions have been understood.

4.6 LOG

ECAS Manager will log the Emergency Service request.



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5 Active Call Query

On occasions, Emergency Services may need to query details of a recently received emergency call.

5.1 AN ACTIVE CALL

This is the period from the initial emergency call being received in ECAS, to the point of requested service delivery by the Emergency Service to the scene of the emergency incident (e.g. an Ambulance arriving at the scene of a road traffic accident) Therefore an Active Call is the period from the initial emergency call to help arriving.

Information disclosure may be forwarded to the Emergency Service under the exemptions as follows, in accordance with Section 8(d) of the Data Protection Act.

- in the interest of the security of the state
- is required urgently to prevent injury or damage to the health of a person
- is required urgently to prevent serious loss of or damage to property
- ECAS will handover all call information currently available including details of any notes added by the ECAS Operator.

The above criteria allow an override of the Data Protection Act under section 8 on a per call basis.

5.2 COMMUNICATIONS MODEL

The following simple communication model will be used for Active Call Query

- Contact
- Verification
- Information Exchange
- Replay & Confirm
- Communicate within ECAS
- Log

5.3 Contact

Emergency Service will ring Navan ECAS Centre on telephone number [REDACTED] in the first instance and if this number is not available then mobile telephone number [REDACTED] should be contacted.

In the event that the Navan telephone numbers cannot be contacted the Emergency Service will ring Ballyshannon ECAS Centre on telephone number [REDACTED] in the first instance and if this number is not available then mobile telephone number [REDACTED] should be contacted.

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5.4 VERIFICATION

The above telephone numbers will only be issued to Emergency Services and therefore knowledge of these numbers will verify the caller as a legitimate Emergency Service. The telephone number will be answered by an ECAS Manager.

5.5 INFORMATION EXCHANGE

Emergency Service will explain situation and ask for details about a specific call detailing the CLI and approximate time of call.

The ECAS Manager will locate the details of the call from the ECAS Management Information System and pass these verbally to the Emergency Service.

5.6 REPLAY & CONFIRM

ECAS Manager will confirm with the Emergency Service that all the requested information about the call has been passed to and understood by the Emergency Service.

5.7 LOG

ECAS Manager will log the Emergency Service request.

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6 Call Recording Request

The Emergency Services normally request information regarding emergency calls when they require a copy for investigation or legal purposes. The Emergency Services will make these requests via the Head of Operations.

The Head of Operations can be contacted as follows:-



6.1 CALL RECORDING REQUEST

Request for call recording and associated data is made via the BT Operations Team:

- An Garda
 - The request must be signed by An Garda Siochana Superintendent
- Ambulance Service
 - The request must be signed by Senior Ambulance Officer
- Fire Service
 - The request must be signed by Chief Fire Officer or Regional Control Centre Manager
- Irish Coast Guard
 - The request must be signed by Divisional Controller / Regional Control Centre Manager

The request must be forwarded to the BT Head of Operations for processing.

The BT Head of Operations will send, via registered post, the call recording and associated data to the Emergency Service via a CD formatted to read only.

As an alternative delivery mechanism the CD can be collected in person from the BT Head of Operations at a pre-agreed time from the Navan ECAS Centre.

The Head of Operations will be responsible for dealing with these requests on behalf of ECAS.

The Head of Operations shall ensure that archived Case Data and Call Voice Recordings shall be available for review within one Business Day.

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Emergency Call Answering Service
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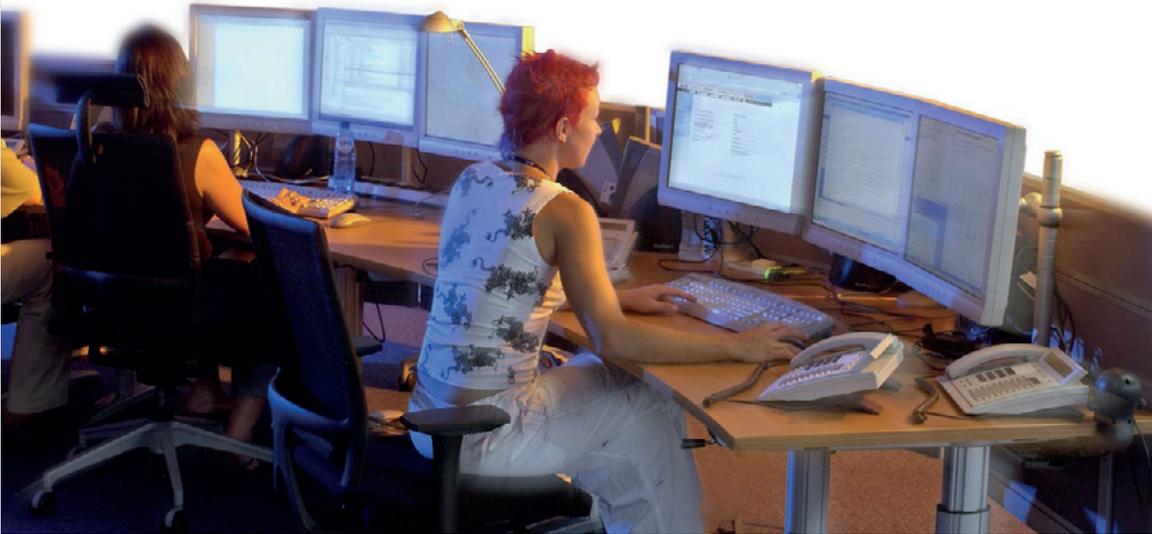
Emergency Call Answering Service (ECAS)

Document Title: *Communications between*

Emergency Services and ECAS

Document Number: *ECAS/SUP/S047*

Document Version: *Version 13*



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DOCUMENT CONTROL

Document Control	
Document Title:	Communications between Emergency Services and ECAS
File Name:	Communications between Emergency Services and ECAS
Issue:	Release v 13
Document Authoriser:	[REDACTED] Head of Operations
Document Owner:	[REDACTED] Call Centre Manager
Approved On:	12/09/2019

DOCUMENT REVISION CONTROL

Document Revision Control			
Revision	Description of change	Author	Approval Date
Version 1	Draft	[REDACTED]	06/05/2010
Version 2	Internal Review	[REDACTED]	06/05/2010
Version 3	Section 6.1 (Call Recording Request) updated to reflect authorisation signatories for Ambulance Service, Fire Service and Coastguard	[REDACTED]	27/05/2010
Version 4	Section 6.1 (Call Recording Request) updated to reflect authorisation signatories for Fire Service	[REDACTED]	01/06/2010

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Version 5	<p>Section 3.4 updated to reflect BT Contractual obligations.</p> <p>Section 5.1 updated to reflect all call information including notes being made available</p> <p>Section 5.5 updated to reflect provision of CLI and approximate time of call to better identify call required.</p> <p>Section 6 ECAS Policy and Performance Manager contact address details added.</p> <p>Section 6.1 updated to reflect delivery options for voice recordings.</p>	[REDACTED]	21/06/2010
Version 6	Section 6.1 (Call Recording Request) updated to reflect authorisation signatories for Irish Coast Guard	[REDACTED]	21/06/2010
Version 7	Section 2.2 (Contact) and Section 5.3 (Contact) updated to include mobile numbers for Navan and Ballyshannon Control Points	[REDACTED]	04/04/2011
Version 8	Transfer of document Ownership to ECAS Document Control	[REDACTED]	10/08//2011
Version 9	<p>Section 3.1 3.2 and 6.1 changed to represent Head of Operations as amalgamation of roles.</p> <p>Section 6 changed to represent how data should be requested, i.e. in writing by e-mail.</p>	[REDACTED]	08/10/2011
Version 10	<p>[REDACTED] ow Document owner.</p> <p>Call recording request details updated.</p>	[REDACTED]	14/08/13

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Version 11	Updated Document Owner Removed Navan as Lead Centre. Amended contact number to ES Hotline.	[REDACTED] FLM	06/03/2019
Version 12	Details on playing call recording on ES hotline added.	[REDACTED] FLM	22/08/2019
Version 13	Section 2 & 4 – Lead Operator added. Section 2,4 &5– Event log added	[REDACTED] FLM	12/09/2019

DOCUMENT LOCATION

File Location	
Master File Location:	BT ECAS SharePoint

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CONFIDENTIALITY STATEMENT

ECAS Confidentiality

BT recognises the importance of maintaining the confidentiality of all matters related to the handling of Emergency Calls and will ensure that all ECAS personnel comply.

This will be enforced within employee contracts and training and disciplinary action will be taken against any individuals who are proven to be in breach of this requirement. Only authorised personnel will have access to Case Data and all systems that hold this data will be security password protected.

Only authorised personnel within BT will be allowed to communicate with anyone external to the ECAS operation.

Data Protection Act (DPA)

BT in Ireland is subject to obligations under the Data Protection Acts, 1988 and 2003 (as amended from time to time) (the "DPA"). The BT Data Protection Policy sets out guidelines and processes which all employees must comply with on a consistent basis. Awareness of our obligations under the DPA and this Policy is vital for everyone in BT to help protect BT, BT people and BT's customers.

Training will be provided to all ECAS personnel regarding their responsibilities under the DPA and the BT Data Protection Policy and will be refreshed to all ECAS personnel annually.

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TABLE OF ACRONYMS

Table of Acronyms	
Abbreviation	Detail of Acronyms
ECAS	Emergency Call Answering Service

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1 OVERVIEW

Communications between the Emergency Services and ECAS will form an integral part of the overall 112/999 Service. Given the importance of these communications it is therefore necessary for both ECAS and the Emergency Services to understand the different protocols applicable to the following scenarios

- Emergency Service Unplanned Operational Event
- Emergency Service Planned Operational Change Request
- ECAS call-routing issue
- Emergency Service Active Call Query
- Emergency Service Call Recording Request

The following detailed communication process is simple, structured and flexible to ensure that the best levels of service quality and availability are maintained.

1.1 DOCUMENT PURPOSE

The purpose of this document is to describe the communication process including information flow for the following scenarios

- Emergency Service Unplanned Operational Event
- Emergency Service Planned Operational Change Request
- ECAS call-routing issue
- Emergency Service Active Call Query
- Emergency Service Call Recording Request

1.2 DOCUMENT AUDIENCE AND OBJECTIVES

It is intended for ECAS and the Emergency Services use. It provides guidance for the communication process including information flow which will be an integral part of the overall ECAS Service.

The objectives of this document are to:

1. Provide guidance for communications between Emergency Services and ECAS
2. To ensure that the best levels of service quality and availability are maintained

1.3 DOCUMENT REVIEW

Annually or with design changes

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2 Emergency Service Unplanned Operational Event

An Emergency Services Unplanned Operational Event will in all likelihood be temporary in nature and will probably result in a temporary change to existing call-routing rules within ECAS. These types of event will most likely require immediate remedial actions to be carried out within ECAS

For example:

- *Emergency Service evacuation of a Control Centre*
- *Delays / re routing of calls to another Emergency Service Control Centre*
- *Spate Conditions*

2.1 COMMUNICATION MODEL

The following simple communication model will be used for Unplanned Operational Events

- Contact
- Verification
- Information Exchange
- Replay & Confirm
- Communicate within ECAS
- Log

2.2 CONTACT

Emergency Service will ring Lead Centre on telephone number [REDACTED]

Restrictions and security for the usage of ECAS Centre contact telephone numbers were communicated previously to the Emergency Services.

2.3 VERIFICATION

The above telephone numbers will only be issued to Emergency Services and therefore knowledge of these numbers will verify the caller as a legitimate Emergency Service. The telephone number will be answered by an ECAS Manager/Lead Operator.

2.4 INFORMATION EXCHANGE

Emergency Service will explain situation e.g. Evacuation, Spate Condition. The ECAS Manager/Lead Operator will inform Emergency Service the current instructions that are recorded and configured within ECAS for the given situation e.g. Evacuation calls will be routed to another designated Control Centre. If no current instructions are recorded or configured within ECAS for the given situation the ECAS Manager/Lead Operator will request instructions from Emergency service.

2.5 REPLAY & CONFIRM

ECAS will confirm the Emergency Service making request i.e. Garda , Fire Service, Ambulance Service or Irish Coastguard. ECAS Manager/Lead Operator will confirm

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Emergency Service Control Room making request. ECAS Manager/Lead Operator will replay instructions to the Emergency Service. ECAS Manager/Lead Operator will confirm that the instructions have been understood.

2.6 Log

ECAS Manager/Lead Operator will log the Emergency Service request in the ECAS event log.

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3 Emergency Service Planned Operational Change Request

An Emergency Service Planned Operational Change Request will be communicated to ECAS in a timely manner and the implementation of this Change Request will be agreed, planned scheduled with the Emergency Service. These types of event will most likely require permanent configuration changes within ECAS

For example:

- *Emergency Service Border Re-Mapping*
- *Emergency Service Control Room Consolidation*
- *Permanent change to 112/999 telephone number(s)*
- *Permanent change to Critical Contact Numbers*

The following simple communication model will used for Planned Operational Change Request

- Meeting
- Inform ECAS
- Schedule Change
- Implement change

3.1 MEETING

There will be regular meetings scheduled with each of the Emergency Services and these meetings may provide a forum for informing ECAS about future Planned Operational Change Requests. The Quarterly ECAS Governance meeting may also be a reasonable forum to inform other Emergency Services of planned Operational Changes which may directly impact Inter-Agency working. If deemed necessary the Emergency Service will schedule a Change Request specific meeting with the ECAS Head of Operations to inform of the Planned Operational Change Request.

3.2 INFORM ECAS

Emergency Service will inform ECAS in writing of the Planned Operational Change Request. This notification should be issued to the ECAS Head of Operations.

3.3 SCHEDULE CHANGE

Using impact analysis and a robust Change Control process ECAS will schedule the required change. Emergency Service will be informed that the Change Request has been scheduled.

3.4 IMPLEMENT CHANGE

As per Contract schedule ECAS are contractually obliged to implement required changes. ECAS will inform Emergency Service that the change has been implemented.

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4 ECAS Call-Routing Issue

ECAS may have to contact an Emergency Service to inform of a call-routing issue with a particular Control Room

For example:

- *Emergency Service Control Room no answer / engaged*
- *Emergency Service Control Room unavailable*

4.1 COMMUNICATION MODEL

The following simple communication model will used for unplanned operational events

- Contact
- Verification
- Information Exchange
- Replay & Confirm
- Communicate within ECAS
- Log

4.2 CONTACT

The ECAS Manager/Lead Operator will contact the Emergency Service on the previously supplied Critical Contact Number for the relevant Control Room.

4.3 VERIFICATION

The ECAS Manager/Lead Operator will verify themselves to the Emergency Services by stating

"This is [ECAS Manager/Lead Operator Name] calling from [centre name] needing to speak to the person in-charge in [Emergency Service Control room name]".

4.4 INFORMATION EXCHANGE

ECAS Manager/Lead Operator will explain situation e.g. all 112/999 numbers engaged for Control Room. The ECAS Manager/Lead Operator will inform Emergency Service the current instructions that are recorded and configured within ECAS for the current situation e.g. Calls should be re-routed to another designated Control Centre. If no current instructions are recorded are configured within ECAS for the given situation the ECAS Manager/Lead Operator will request instructions from Emergency service.

4.5 REPLAY & CONFIRM

ECAS will confirm the Emergency Service providing advice i.e. Garda, Fire Service, Ambulance Service or Irish Coastguard. ECAS Manager/Lead Operator will confirm Emergency Service Control Room providing advice. ECAS Manager/Lead Operator will

Appendix 7.13 ECAS/SUP/S047 V13



IN COMMERCIAL CONFIDENCE
Emergency Call Answering Service
ECAS Security Clearance Process
ECAS/SUP/ S047

replay instructions to the Emergency Service. ECAS Manager/Lead Operator will confirm that the instructions have been understood.

4.6 LOG

ECAS Manager/Lead Operator will log the Emergency Service request in the ECAS event log.

Appendix 7.13 ECAS/SUP/S047 V13



IN COMMERCIAL CONFIDENCE
Emergency Call Answering Service
ECAS Security Clearance Process
ECAS/SUP/ S047

5 Active Call Query

On occasions, Emergency Services may need to query details of a recently received emergency call.

5.1 AN ACTIVE CALL

This is the period from the initial emergency call being received in ECAS, to the point of requested service delivery by the Emergency Service to the scene of the emergency incident (e.g. an Ambulance arriving at the scene of a road traffic accident) Therefore an Active Call is the period from the initial emergency call to help arriving.

Information disclosure may be forwarded to the Emergency Service under the exemptions as follows, in accordance with Section 8(d) of the Data Protection Act.

- in the interest of the security of the state
- is required urgently to prevent injury or damage to the health of a person
- is required urgently to prevent serious loss of or damage to property
- ECAS will handover all call information currently available including details of any notes added by the ECAS Operator.

The above criteria allow an override of the Data Protection Act under section 8 on a per call basis.

5.2 PLAYING CALL RECORDINGS VIA ES HOTLINE

The introduction of the new PABX Cisco phone system has added extra functionality to the phone system within the ECAS centres. This has allowed ECAS to make changes that will benefit both ECAS and the emergency services. One of these changes is that the lead operator in the lead centre will now be able to, under very specific guidelines, play call recordings via the ES Hotline to members of the Emergency Services.

A list of ES Critical Contact Numbers (CCNs) is held at Control Point. Only calls received from these numbers will be permitted to have call recordings played on them.

In the event of a member of an emergency service calling from a number other than the CCN you must inform them that you can only play calls over the CCN and advise them that you will call them back on the CCN if they are able to travel to the relevant ES control room. If they are unable to travel to the control point and use the CCN they will have to request a call recording **in the usual way** and the call will not be played over the ES Hotline.

Calls may only be played back if they are **currently live**.

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5.3 COMMUNICATIONS MODEL

The following simple communication model will be used for Active Call Query

- Contact
- Verification
- Information Exchange
- Replay & Confirm
- Communicate within ECAS
- Log

5.4 Contact

Emergency Service will ring Lead Centre on telephone number [REDACTED]

5.5 VERIFICATION

The above telephone numbers will only be issued to Emergency Services and therefore knowledge of these numbers will verify the caller as a legitimate Emergency Service. The telephone number will be answered by an ECAS Manager/Lead Operator.

5.6 INFORMATION EXCHANGE

Emergency Service will explain situation and ask for details about a specific call detailing the CLI and approximate time of call.

The ECAS Manager/Lead Operator will locate the details of the call from the ECAS Emergency Audit Report and pass these verbally to the Emergency Service.

5.7 REPLAY & CONFIRM

ECAS Manager/Lead Operator will confirm with the Emergency Service that all the requested information about the call has been passed to and understood by the Emergency Service.

5.8 LOG

ECAS Manager/Lead Operator will log the Emergency Service request in the ECAS event log.

Appendix 7.13 ECAS/SUP/S047 V13



IN COMMERCIAL CONFIDENCE
Emergency Call Answering Service
ECAS Security Clearance Process
ECAS/SUP/ S047

6 Call Recording Request

The Emergency Services normally request information regarding emergency calls when they require a copy for investigation or legal purposes. The Emergency Services will make these requests via the Head of Operations.

The Head of Operations can be contacted as follows:-



6.1 CALL RECORDING REQUEST

Request for call recording and associated data is made via the BT Operations Team:

An Garda

- The request must be signed by An Garda Siochana Superintendent

Ambulance Service

- The request must be signed by Senior Ambulance Officer

Fire Service

- The request must be signed by Chief Fire Officer or Regional Control Centre Manager

Irish Coast Guard

- The request must be signed by Divisional Controller / Regional Control Centre Manager

The request must be forwarded to the BT Head of Operations for processing.

The BT Head of Operations will send, via registered post, the call recording and associated data to the Emergency Service via a CD formatted to read only.

As an alternative delivery mechanism the CD can be collected in person from the BT Head of Operations at a pre-agreed time from the Navan ECAS Centre.

The Head of Operations will be responsible for dealing with these requests on behalf of ECAS.

The Head of Operations shall ensure that archived Case Data and Call Voice Recordings shall be available for review within one Business Day.

Appendix 7.14 SAR OPS Notice 5/18

SAR OPS Notice 5/18

SAR Ops Notice	5/18
Title	Processing ECAS Calls at RCCs
Purpose	<i>To provide an update on IRCG use of ECAS AML data and guidelines on interaction with ECAS</i>

Date of Issue	26 th July 2018
Version/ Change	<i>Nil</i>
Date First Issued	<i>N/A</i>

Reviewed by	[REDACTED]
Approved By	[REDACTED]

Related Documents	Nil
References/Notes	Nil
Appendices	SILAS Log Sample
<i>External</i>	1. <i>ECAS consulted in Document Drafting.</i>

Appendix 7.14 SAR OPS Notice 5/18

SAR Ops Notice 05/18

Introduction.

1. IRCG is one of the four designated recipients of ECAS 112/999 calls, the others being AGS, Ambulance and Fire Service. ECAS callers are offered one of the four services and the ECAS operator stays on the line until they are satisfied that the call is being appropriately managed by the selected service. *Advanced Mobile Location (AML)*¹, a GPS based technology that unknown to the caller automatically transmits a callers location to ECAS, has been in use since 2017. SILAS has been upgraded to process AML data and plans for a further upgrade of the display are nearing completion.
2. Mobile phones may be the only means available to a casualty to raise the alarm including in coastal cliff or boating emergencies and the capacity to relay information may be limited.

Aim

3. The purpose of this notice is provide an update on progress with accessing AML information on SILAS and to provide guidelines on how to manage calls and information obtained from ECAS connected calls.

AML

4. AML technology is available on all newer versions of smart phones. The system utilise the inbuilt GPS technology on a smart phone to transmit a callers location to ECAS. AML is not dependent on the caller's phone having its caller location enabled, as the system overrides such settings. ECAS estimate that over 40% of all calls are now AML enabled with the volume of AML phones continuing to rise. The remainder of phones will provide the location of the Mobile Cell Antenna that processes the call; this information provides ECAS with an immediate indication of the caller's general location.
5. Calls received by ECAS from international mobile providers, **do NOT provide** AML data. (including Britain and NI)
6. **Recognising AML at RCCs.**
 - a. As currently designed an RCC will recognise an AML call by the *Level of Confidence* as displayed on the log reading. A confidence level of greater than 60% is a clear indicator that it is an AML position. See attached sample at Appendix 1. The acronym *AML* is NOT displayed on the log reading.
 - b. RCC watch officers have the option of asking the ECAS operator if an AML position is available. ****

¹ This technology is also known as AEL (Advanced Emergency Location) and ELS (Emergency Location Services)

Appendix 7.14 SAR OPS Notice 5/18

- c. The ECAS operated *OASIS* web interface can also be checked for AML. [REDACTED] Log in details are published at each RCC by DC.

Non-AML Calls

7. Calls made to ECAS from non AML enabled phones will provide location of the mobile cell antenna. The log also displays the approximate area coverage for that mobile cell and a bearing which is the direction of coverage of the beam from the mast. No indication of beam width is provided, so the information is of little help in determining the caller's precise location. ECAS experience has shown that callers can be situated outside the "advertised" area of coverage provided by the mobile network operator.
8. No information on other mobile cells/antennae detecting the call is immediately available. This information can only be provided if details of the phone service provider are known. Additional information can only be sourced from the service provider. Therefore it is not possible to immediately obtain a more up to date position using triangulation techniques. Such requests can only be processed on foot of a direct request from AGS and are more suited to missing person searches as there is a slower turnaround time.
9. Health Atlas provides a system known as *Locate Me 112* whereby a text is sent to the caller's smart phone, requiring the caller to respond by Text, which in return provides the callers location. (*Smart phone only*)

Guidelines on Processing Incomplete Calls

10. Situations can arise, whereby connected calls do not generate any or sufficient information with regard to the nature of the emergency or in the case of non-AML phones, the location of the emergency. In such situations there are a number of possible options to be exercised by the RCC;
 - a. If a call is disconnected soon after being connected, or at an early stage of the conversation, the ECAS operator should still be on the line and the operator should be asked to provide any relevant information that was provided including prior to the call being connected to IRCG.
 - b. The operator has the capacity to replay the first 45 seconds of the emergency call which will include the portion of the call with ECAS prior to it being connected to the RCC. If there is confusion as to the caller's situation, this facility should be availed of and requested, as there can often be valuable information revealed in the "second listen" with 2 people listening.

Appendix 7.14 SAR OPS Notice 5/18

- c. WOs should try calling back the number of the caller, which may or may not elicit a result.
- d. ECAS should be contacted **on Hotline number** [REDACTED] in circumstances where WOs require additional information with regard to incomplete calls or supporting information.
 - i. ECAS for technical reasons do not have a capacity to replay an emergency call “down the line” on the hotline (or any other call) from the RCC. The lead operator can listen to the emergency call, note any information and then relay this to the RCC operator on the hotline call.
 - ii. In such circumstances it would be important to ascertain what information was provided that resulted in the call being connected to IRCG as with any other information that was obtained in relation to the callers situation.

ECAS Hotline and other ECAS Information

- 11. Any operational queries to ECAS should only be raised on the **ECAS HOTLINE NUMBER** [REDACTED]. Operational queries should NOT be raised with individual ECAS centres via their PSTN lines.
 - a. PSTN lines are for backup use only and should only be used in the event that the ECAS cannot be contacted on the Hotline number.
- 12. ECAS services are NOT regionally based, any emergency call may be answered and handled in any of the ECAS Centres and Hotline Emergency Service queries are processed by the lead centre at the time.
 - a. There is therefore no direct correlation between an ECAS call centre such as Navan or Ballyshannon and its immediate hinterland. For example a query in relation to Drogheda is as likely to be processed in Ballyshannon as Navan.
- 13. Any 112 request for assistance in relation to a water-based incident will be referred to the IRCG. The ECAS operator will only release themselves once they are satisfied that IRCG has accepted the call and it is not more appropriate to another service. The SMC may subsequently pass the call to another service if considered appropriate.
- 14. ECAS provide IRCG with a daily report of calls connected to RCCs. This report includes a list of calls where any delay in answering was experienced. This report is augmented by weekly and monthly reports as well as reports presented at the quarterly ECAS meeting with the ECAS user group.
- 15. Calls made from phones without a SIM card will not generate AML information but ordinarily will provide location of the mobile cell antenna.

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SILAS UPGRADE

16. As part of the SILAS upgrade CRITICAL have been requested to ensure that the Acronym AML is automatically displayed for all such calls and the most suitable order of information and method of display is also to be agreed.

Ends.

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Appendix 1 to
SAR Ops Notice 5/18

Sample Log Entries

Example 1- AML enabled report

ENTRY DATE

xx 1405Z Jul 18

FROM

██████████ → *phone number provided unless caller has removed SIM*

TO

NMOC Dublin

CHANNEL

999/112 Call

DETAILS

BULLOCK HARBOUR BOAT GOING UP ON ROCKS

SMALL SPEED BOAT 17FT

2 POB

ONE GONE INTO WATER NO LIFE JACKETS

CASUALTY

Unknown

POSITION

53°17.13N 006°06.45W

LINKED RECORD

UIIN1615/18 (BOAT ON THE ROCKS BULLOCK HARBOUR)

ANSWER TIME

2 sec → *Time taken for RCC to answer call*

CALL DURATION

45 sec

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CALL DETAILS

CALLER IDENTIFICATION

CALLER NUMBER:

[REDACTED]

CALLBACK NUMBER:

[REDACTED]

MOBILE OR LANDLINE:

Mobile

CELL INFO

ADDRESS:

DUBLIN 5

DUBLIN

CELL NAME:

Mobile site found

GEOGRAPHIC INFO

CELL OR HANDSET:

Unknown

LOCATION SHAPE:

Circle

LOCATION COORDINATES:

53°17.13N 006°06.45W

LOCATION DIMENSIONS:

010°

LEVEL OF CONFIDENCE:

68%

AML position; as % exceeds 60%

NATIONAL GRID IDENTIFIER:

EI

NATIONAL GRID REFERENCE:

326261 227778

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Example 2 – Call from non AML enabled phone

LOG ENTRY L1075xx/18

TYPE OF ENTRY
Alert

ENTRY DATE
xx 1353Z Jul 18

FROM
[REDACTED]

TO
NMOC Dublin

CHANNEL
999/112 Call

DETAILS
am at coast guard station in drogheda
dead something
profanities used cleared line // playback unresolved info

CASUALTY
Unknown object on slipway

POSITION
53°42.56N 006°21.35W

LINKED RECORD
UIIN1596/18 (Concerns at Drogheda CGU slipway)

ANSWER TIME
2 sec

CALL DURATION
1 min 21 sec

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CALL DETAILS

CALLER IDENTIFICATION

CALLER NUMBER:

[REDACTED]

CALLBACK NUMBER:

[REDACTED]

MOBILE OR LANDLINE:

Mobile

CELL INFO

ADDRESS:

DROGHEDA

LOUTH

CELL NAME:

Mobile cell found

GEOGRAPHIC INFO

CELL OR HANDSET:

Unknown

LOCATION SHAPE:

NIL

LOCATION COORDINATES:

53°43.02N 006°21.42W



Location of Mobile cell antenna

LOCATION DIMENSIONS:

250° 0.855 km

Direction of coverage of Mobile cell Mast Beam + approx area coverage

LEVEL OF CONFIDENCE:

2%



Low % indicates that this Not an AML so position is that of cell antenna

NATIONAL GRID IDENTIFIER:

EI

NATIONAL GRID REFERENCE:

308522 275383

Appendix 7.15 999/112 - Coast Guard Aide Memoire for handling calls - in use at the time of this incident

For Official Irish Coast Guard Use Only

999 / 112 CALLS – HOAX OR NUISANCE CALLS

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Section

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A 999/112 call indicates that someone is reporting an emergency situation and requires immediate attention.

Checklist (for incident evaluation)

- WHO is making the 999 Call name;
- CALL-BACK NUMBER number;
- TIME of OCCURRENCE time (Datum Time for the Incident);
- LOCATION identifiable location, grid reference or lat and long;
- INCIDENT DETAILS full details necessary to pursue the incident before terminating the call;
- PERSONS AT RISK numbers involved (POB);

- a call should always be answered with " Dublin Coast Guard "; "Malinhead Coast Guard", Valentia Coast Guard" as appropriate.
- consider asking the first informant to remain on scene and monitor the situation stressing that they must not place themselves at risk.
- does the call back number agree with what the operator has;
- is it practical to send a Coast Guard Volunteer to meet the first informant;
- remember, the call could be for another centre or for the Gardai or other rescue authority – The 999 Operator may remain on the line throughout the call and can give location advice and also can assist with transfer of a call to another location or to another service if so requested.
- ensure you have all the information you need to pursue the incident, before terminating the call;
- **It is the responsibility of the co-ordination centre (not the Call Handling Centre) to obtain adequate address and call-back details and incident location information from the caller and / or the operator, to ensure that the incident being reported can be located;**

Actions to be Considered

- if the report relates to activity for which the IRCG has lead responsibility determine if the incident is in the;

ALERT Phase
URGENCY Phase;
DISTRESS Phase.

- **all calls must be investigated and acted upon until the reported incident has been successfully dealt with, or determined that no assistance was required. If the call is suspected as being a hoax, SMCs must take every measure to satisfy themselves that no one would be at risk if the call is terminated and the incident closed.**

Notes

- 999/112 calls have priority over all other telephone;
- 999/112 calls are received on a primary line dedicated solely for the use of incoming 999 calls.
- Beware, that with multiple calls, when the primary line is occupied, further calls will be routed to your secondary line, which is an ex-directory line. This will not give the standard 999 alert tone
- Be prepared for and understand why you could receive a 999 call on your X Directory line;

The above Checklists serve as an aide mémoire only and must be fully understood and implemented in accordance with Irish Coast Guard Standard Operating Procedures.

Appendix 7.15 999/112 - Coast Guard Aide Memoire for handling calls - in use at the time of this incident

For Official Irish Coast Guard Use Only

999 / 112 CALLS – HOAX OR NUISANCE CALLS

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Hoax or nuisance call evaluation and action

If a 999/112 call is suspected to be a hoax or nuisance call, consider the following points bearing in mind that if the call is genuine then lives could be at risk.

Information required and does this information fit in with the incident itself

- Name of caller
- Address/location of caller
- Location of reported incident
- Does the number given by the caller correspond to the number provided by the operator?
- Does the caller sound like a child, adult, male or female?
- Is there significant background noise to the call e.g.
- Music/party/pub
- Road/rail traffic
- Sound of the sea etc.
- Person/s in the background prompting the caller and not just relaying information
- Quietness
- Other – specify.

Make a return call to the number given if in doubt. If is proven to be a hoax or nuisance call and the caller is on the line the following may be issued;

“This is the Coast Guard Emergency Service. A hoax/nuisance call was made on this number at xxxxx and has been reported to the Gardai. Any further hoax or nuisance calls may result in a prosecution and disconnection from the network”

The above Checklists serve as an aide mémoire only and must be fully understood and implemented in accordance with Irish Coast Guard Standard Operating Procedures.

Appendix 7.16 IRCG SAR OPS Notice 7/18

SAR OPS Notice 7/18

SAR Ops Notice	7/18
Title	Processing ECAS Calls at RCCs
Purpose	<i>To set out IRCG procedure for processing ECAS Calls including AML data and provide guidelines on interaction with ECAS</i>

Date of Issue	17 th Dec 2018
Version/ Change	Replaces SAR OPS Notice 5/18
Date First Issued	6 th July 2018

Reviewed by	[REDACTED]
Approved By	[REDACTED]

Related Documents	Nil
References/Notes	Nil
Appendices	<ol style="list-style-type: none"> 1. SILAS Sample AML Descriptions. 2. SILAS Log Sample
<i>External</i>	<ol style="list-style-type: none"> 1. <i>ECAS consulted in Document Drafting.</i>

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Appendix 7.16 IRCG SAR OPS Notice 7/18

Introduction.

1. IRCG is one of the four designated recipients of ECAS 112/999 calls, the others being AGS, Ambulance and Fire Service.
 - a. ECAS callers are offered one of the four services and the ECAS operator should stay on the line until they are satisfied that the call is being appropriately managed by the selected service.
 - b. *Advanced Mobile Location (AML)*¹, a GPS based technology that unknown to the caller automatically transmits a callers location to ECAS, has been in use since 2017. SILAS has a facility for processing AML data.
2. Mobile phones may be the only means available to a casualty to raise the alarm in coastal cliff or boating emergencies and the connectivity and capacity to relay information may be limited.
3. Any water based incident reported to ECAS is connected to IRCG for evaluation.
4. Any direct request for a helicopter where ECAS is unable to elicit casualty details is connected to IRCG for evaluation.
5. ECAS have upgraded their facilities for replaying received calls while the incident is Live.

Aim

6. The purpose of this notice is set out arrangements for accessing and utilising AML information on SILAS and to provide guidelines on how to manage calls and information obtained from ECAS connected calls.

Checklist

7. The following checklist provides a summary of key issues. It is intended as an Aid Memoire on issues that may arise and should be used in conjunction with the full notice.

¹ This technology is also known as AEL (Advanced Emergency Location) and ELS (Emergency Location Services)

Appendix 7.16 IRCG SAR OPS Notice 7/18**ECAS Calls CHECKLIST - (for SAR Ops Notice 7/18)**

1. Check Position Info: Is call AML, Non AML, Limited Network Coverage, Non SIM Phone or Land Line?
 - 1.1.1. Check SILAS for call information. **GREEN** for AML. **YELLOW** for Mobile Cell Mast. **RED** for No position available.
 - 1.2. For AML calls Check *Level of Confidence* on SILAS to confirm phone type.
 - 1.3. Can AML position be cross checked or confirmed by any other means? (Verbally with caller on the line, replay of call, or *Locate Me* on Health Atlas)
 - 1.3.1. Check (ECAS operated) OASIS web interface for AML; <http://ecas.gov.ie/EscQuery/login.aspx/>. Log in details are published at each RCC by DC.
 - 1.3.2. Consider using *Locate Me* tool on Health Atlas to establish callers location.
2. Check with ECAS if any relevant information was sourced prior to call being connected.
3. Consider requesting immediate playback of call while operator is still on the line.
4. Consider requesting a **Post Call - Replay** of Full Call from ECAS using HOTLINE number, including section prior to call being connected to RCC. This facility can be activated at any stage while the Emergency is Live ECAS **HOTLINE NUMBER** [REDACTED]
5. If non-AML check if antenna information provide any useful information such as general location.
6. If the callers number is available consider direct call back. (Displayed on Silas Log)
7. If a direct request for a Helicopter is made by a caller, determine whether it is a decision for NAS/NEOC or IRCG and follow up as necessary.
8. Check if call was made on national service or an external roaming number.
 - 8.1. AML is NOT available on roaming calls.
 - 8.2. Cell mast info is available on roaming call and may provide broad location.
9. For extended missing person searches consider direct request to AGS for use of Antennae Triangulation Search for which casualty's phone service provider must be known.

Routine Reports

10. ECAS provides IRCG with a Daily *Connection Times Summary* report. This report identifies any calls that took more than 10 seconds to be answered by the RCC. It is important that IRCG evaluates this information on a case by case basis.
11. SMC (on duty when report received) to review and email DC with report on any matters arising from the daily ECAS summary.

Checklist Ends

Appendix 7.16 IRCG SAR OPS Notice 7/18

Categorisation of Calls on SILAS

8. Calls received from ECAS are automatically colour Coded in the SILAS Log as follows;

	Colour Code on SILAS	Text	Level of Confidence – (as recorded in log)
AML	GREEN	999/112 (AML)	68% or greater (68% for Android and higher than 68% for I-Phone)
Non-AML(mobile phone)	YELLOW	999/112 (mobile Cell/Mast)	Less than 68% generally single figure
Limited Network Coverage** or Landline or No SIM in phone	RED	999/112 Call (No Position available)	-
See samples at Appendix 2			
<p>**When the call is made from a phone in a Limited Service State (LSS).</p> <p><i>LSS arises when the caller’s phone does not have coverage from its own mobile phone network but does have from another mobile phone network (e.g. a Vodafone caller has no Vodafone coverage but does have coverage from the Meteor network). In this situation the callers mobile phone will display “Emergency calls only” on the screen and allow the caller to make an Emergency call using the available network (e.g. meteor) however ECAS will not receive a CLI for this caller and it will not be possible to call the caller back if the call drops.</i></p> <p>ECAS Manufactured CLIs (calling line identification) are an unfamiliar looking phone number that start with “99”</p>			

9. Situations can arise, whereby connected calls do not generate sufficient information with regard to the nature of the emergency and/or in the case of non-AML phones, the location of the emergency.

- a. The ECAS operated OASIS web interface can also be checked for AML. [REDACTED] Log in details are published at each RCC by DC.

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- b. RCC Watch Officers (WOs) have the option of asking the ECAS operator if an AML position is available.
- c. Caller location can also be established using *Locate Me* on the HSE Health Atlas by clicking on SMS Tab, inserting the callers number and activating locate button. Caller will need to have data enabled on their phone and activate a SMS response message.

General Requests for Helicopters

- 10. ECAS may receive calls for Helicopter assistance with No other supporting information. If ECAS are unable to determine casualty circumstances or determine which ES should receive the call, a direct request for a helicopter will as per agreed arrangements be forwarded to IRCG for evaluation. In such circumstances the SMC should endeavour to evaluate the nature of the emergency and determine whether use of an IRCG helicopter is appropriate or if the call should be referred to another ES via ECAS.

Water Based Incidents

- 11. Any 112 request for assistance in relation to a water-based incident will be referred to the IRCG. The ECAS operator will only release themselves once they are satisfied that IRCG has accepted the call and it is not more appropriate to another service. The RCC may request to have the call passed to another ES if considered appropriate.

Guidelines on Processing Incomplete Calls

- 12. **Additional information and Call Replay should be requested from ECAS either while the ECAS operator is on the line OR by a subsequent request to ECAS.**
 - a. This can be done via the *Immediate/Live Playback Facility* or *ECAS Delayed-Playback Facility*.
- 13. If an ECAS 112 call is disconnected soon after being connected, or at an early stage of the conversation, the ECAS operator should still be on the line and the ECAS operator should be asked to provide any relevant information that was provided; including prior to the call being connected to IRCG.

Immediate/Live Playback facility

- 14. ECAS workstations automatically record the first 30 seconds of every call.
 - d. This recording may capture important information that happens on the emergency call before connection to the Emergency Services (ES) such as IRCG.
 - e. The ECAS operator has the ability to replay this recording during the emergency call to the ES call taker. *(This would be unusual but could arise if an issue arises while the caller is connected)*

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- f. To use this facility, the ES may at any point during the call, request the ECAS operator to playback the call i.e. at any stage during the call between ECAS and the ES while the ECAS operator is on the line.
- g. The ECAS operator can also volunteer the use of playback where they feel it will help the emergency service. This will only happen when the caller has cleared, not if the caller is still on the line.
- h. When using the playback facility –
 - i. The ECAS operator will advise *“This playback facility will not be available when our call has ended”* and begin playback of the recording.
 - i. The playback can be repeated as many times as necessary during the emergency call.

ECAS Playback Facility – (Hotline number [REDACTED])

15. If ECAS receive a request from an RCC in relation to an emergency call that has ended, ECAS has the ability to play that call via the ES Hotline.
 - j. This facility will only be used on a “live emergency”, where the caller is still in need of emergency help.
 - k. The service should only be requested via the HOTLINE number.
 - l. This functionality enables the RCC to listen to the entirety of the call, not just the first 30 seconds. It enables playback after the call has ended.
 - m. ECAS will only play emergency calls to requests received from verified numbers in the control centres i.e. IRCG RCCs or equivalent, (known as the “critical contact numbers” that ECAS use to contact control centres).
 - n. If a member of the ESs contacts ECAS requesting to listen to a call and is not calling from a verified number ECAS will arrange to call back on the “critical contact number” to play the call.
 - o. Recordings will not be played on calls made to or received from any number outside of the designated critical contact number for the control centre.
16. In summary, in addition to the *In-call Immediate Playback* facility, ECAS can be contacted on the Hotline number after the Emergency Call has ended. The ECAS Lead operator has the capacity to replay the entire emergency call (including the portion prior to the call being connected to the RCC) over the phone. If there is confusion as to the caller’s situation, this facility should be availed of, as there can often be valuable information revealed in the “second listen” with 2 people listening.
17. WOs should also attempt calling back the number of the caller, which may or may not elicit a result.

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18. ECAS should only be contacted on **Hotline number** [REDACTED] circumstances where WOs require additional information with regard to incomplete calls or supporting information for Live Incidents. Operational queries should NOT be raised with individual ECAS centres via their PSTN lines.
19. It may also be of benefit to ascertain what information was provided, that resulted in the call being connected to IRCG, as with any other information that was obtained in relation to the caller's situation.

AML Technology

20. AML technology is available on all newer versions of smart phones. The system utilise the inbuilt GPS technology on a smart phone to transmit a callers location to ECAS. AML is not dependent on the caller's phone having its caller location enabled, as the system overrides such settings Android phones must be Google registered to be AML enabled. ECAS estimate that circa. 50% of all calls are now AML enabled with the volume of AML enabled phones continuing to rise
21. Calls made to ECAS from non AML enabled phones provide location of the mobile cell antenna that processes the call; this information provides ECAS with an immediate indication of the caller's general location. The log also displays the approximate area coverage for that mobile cell and a bearing which is the direction of coverage of the beam from the mast. No indication of beam width is provided, the information is therefore of little help in determining the caller's precise location. ECAS experience has shown that callers can be situated outside the "advertised" area of coverage provided by the mobile network operator.
22. No information on other mobile cells/antennae detecting the call is immediately available. This information can only be provided if details of the phone service provider are known. Additional information can only be sourced from the service provider. Therefore it is not possible to immediately obtain a more up to date position using triangulation techniques. Such requests can only be processed on foot of a direct request by AGS and are more suited to missing person searches as there is a slower turnaround time.
23. Under existing arrangements roaming calls from external mobile phone services (including Britain and NI) do not provide AML data. The same applies when using an Irish phone abroad.
24. Health Atlas provides a system known as *Locate Me 112* whereby a text is sent to the caller's smart phone, requiring the caller to respond by Text, which in return provides the callers location. (*Smart phone only*)

Appendix 7.16 IRCG SAR OPS Notice 7/18

Additional Information on ECAS

25. PSTN lines are for backup use only and should only be used in the event that the ECAS cannot be contacted on the Hotline number.
26. ECAS services are NOT regionally based. Any emergency call may be answered and handled in any of the ECAS Centres and Hotline Emergency Service queries are processed by the lead centre at the time. There is therefore no direct correlation between an ECAS call centre such as Navan or Ballyshannon and its immediate hinterland. For example a query in relation to Drogheda is as likely to be processed in Ballyshannon as Navan.
27. Limited Services State (LSS) Calls known referred to as LSS arise when the caller's phone does not have coverage from its own mobile phone network but does have from another mobile phone network (e.g. a Vodafone caller has no Vodafone coverage but does have coverage from the Meteor network). In this situation the callers mobile phone will display "Emergency calls only" on the screen and allow the caller to make an Emergency call using the available network (e.g. meteor) however ECAS will not receive a CLI for this caller and it will not be possible to call the caller back if the call drops.
28. Calls made from phones without a SIM card will not generate AML information but ordinarily will provide location of the mobile cell antenna.

Reports and Follow Up

29. ECAS provide IRCG with a daily report of calls connected to RCCs. This report includes a list of calls where any delay in answering was experienced. This report is augmented by weekly and monthly reports as well as reports presented at the quarterly ECAS meeting with the ECAS user group.
30. SMC should review the daily report and email DC with a report on any matters arising from the daily ECAS summary. Reports of delays in processing calls should be cross checked with IRCG records.

Ends.

Appendix 7.16 IRCG SAR OPS Notice 7/18

Appendix 1 to
SAR Ops Notice 7/18

LOG ENTRY L143128/14

Entry Date 14 1150Z May 14

From Caller ID: 086-XXXXXXX

To NMOC Dublin

Channel 999/112 Call (AML)

Type of Entry Alert

Details we were kayaking / turned over / got my brother ashore / we are on the rocks near sandeel bay / near the hook / just to the left / wexford side \\request info

Casualty

Position 52°07.24N 006°54.34W

Linked Record None

Answer Time 4 sec

Call Duration 12 sec

Created by pmessias | Saved Save & Close

Appendix 7.16 IRCG SAR OPS Notice 7/18

LOG ENTRY L143128/14

Entry Date 14 1150Z May 14

From Caller ID: 086-XXXXXXX

To [NMOC Dublin](#)

Channel 999/112 Call (Mobile)

Type of Entry Alert

Details we were kayaking / turned over / got my brother ashore / we are on the rocks near sandeel bay / near the hook / just to the left / wexford side
\\request info

Casualty

Position

Linked Record

Answer Time 4 sec

Call Duration 12 sec

Created by pmessias | Saved

Appendix 7.16 IRCG SAR OPS Notice 7/18

LOG ENTRY L143128/14

Entry Date 14 1150Z May 14

From Caller ID: 086-XXXXXXX

To NMOC Dublin

Channel 999/112 Call

Type of Entry Alert

Details we were kayaking / turned over / got my brother ashore / we are on the rocks near sandeel bay / near the hook / just to the left / wexford side
\request info

Casualty

Position

Linked Record None

Answer Time 4 sec

Call Duration 12 sec

Created by pmessias | Saved 🗑️ ↻ 📧 🖨️ 🔗 🔔 **Save & Close**

Appendix 7.16 IRCG SAR OPS Notice 7/18

Appendix 2 to
SAR Ops Notice 7/18

Sample Log Entries

Example 1- AML enabled report

ENTRY DATE

xx 1405Z Jul 18

FROM

██████████ → phone number provided unless caller has limited coverage
(Limited Services State) or SIM has been removed

TO

NMOC Dublin

CHANNEL

999/112 Call

DETAILS

BULLOCK HARBOUR BOAT GOING UP ON ROCKS

SMALL SPEED BOAT 17FT

2 POB

ONE GONE INTO WATER NO LIFE JACKETS

CASUALTY

Unknown

POSITION

53°17.13N 006°06.45W

LINKED RECORD

UIIN1615/18 (BOAT ON THE ROCKS BULLOCK HARBOUR)

ANSWER TIME

2 sec

→ Time taken for RCC to answer call

CALL DURATION

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45 sec

CALL DETAILS

CALLER IDENTIFICATION

CALLER NUMBER:

[REDACTED]

CALLBACK NUMBER:

[REDACTED]

MOBILE OR LANDLINE:

Mobile

CELL INFO

ADDRESS:

DUBLIN 5

DUBLIN

CELL NAME:

Mobile site found

GEOGRAPHIC INFO

CELL OR HANDSET:

Unknown

LOCATION SHAPE:

Circle

LOCATION COORDINATES:

53°17.13N 006°06.45W

LOCATION DIMENSIONS:

010°

LEVEL OF CONFIDENCE:

68% *AML position provided; as % exceeds 60%*

NATIONAL GRID IDENTIFIER:

EI

NATIONAL GRID REFERENCE:

326261 227778

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Example 2 – Call from non AML enabled phone

LOG ENTRY L1075xx/18

TYPE OF ENTRY
Alert

ENTRY DATE
xx 1353Z Jul 18

FROM
[REDACTED]

TO
NMOC Dublin

CHANNEL
999/112 Call

DETAILS
am at coast guard station in drogheda
dead something
profanities used cleared line // playback unresolved info

CASUALTY
Unknown object on slipway

POSITION
53°42.56N 006°21.35W

LINKED RECORD
UIIN1596/18 (Concerns at Drogheda CGU slipway)

ANSWER TIME
2 sec

CALL DURATION
1 min 21 sec

CALL DETAILS
CALLER IDENTIFICATION

Appendix 7.16 IRCG SAR OPS Notice 7/18

CALLER NUMBER:

[REDACTED]

CALLBACK NUMBER:

[REDACTED]

MOBILE OR LANDLINE:

Mobile

CELL INFO

ADDRESS:

DROGHEDA

LOUTH

CELL NAME:

Mobile cell found

GEOGRAPHIC INFO

CELL OR HANDSET:

Unknown

LOCATION SHAPE:

NIL

LOCATION COORDINATES:

53°43.02N 006°21.42W  *Location of Mobile cell antenna*

LOCATION DIMENSIONS:

250° 0.855 km  *Direction of coverage of Mobile cell Mast Beam + approx area coverage*

LEVEL OF CONFIDENCE:

2%  *Low % indicates that this Not an AML so position is that of cell antenna*

NATIONAL GRID IDENTIFIER:

EI

NATIONAL GRID REFERENCE:

308522 275383

Appendix 7.17 Extract from MARINE NOTICE No. 9 of 2003 - Passage Planning

- SOLAS CHAPTER V – Regulation 34 Voyage Planning

Voyage Planning

Regulation V/34 'Safe Navigation and avoidance of dangerous situations', is a new regulation. It concerns prior-planning for a boating trip, more commonly known as voyage or passage planning. Voyage planning is basically common sense.

Recreational craft users should particularly take into account the following points when planning a boating trip:

- weather: before going boating, check the weather forecast and get regular updates if planning to be out for any length of time.
- tides: check the tidal predictions for the trip and ensure that they fit with the planned trip.
- limitations of the vessel: consider whether the boat is up to the proposed trip and that there is sufficient safety equipment and stores.
- crew: take into account the experience and physical ability of the crew. Crews suffering from cold, tiredness and seasickness won't be able to do their job properly and could even result in an overburdened skipper.
- navigational dangers: make sure the crew is familiar with any navigational dangers that may be encountered during the boating trip. This generally means checking an up to date chart and a current pilot book or almanac.
- contingency plan: always have a contingency plan should anything go wrong. Before departing, consider places where the boat can take refuge should conditions deteriorate or if the crew suffer an incident or injury. Bear in mind that the GPS set is vulnerable and could fail at the most inconvenient time. It is sensible and good practice to make sure that the crew are not over-reliant on the GPS set and that they can navigate to safety without it should it fail.
- information ashore: make sure that someone ashore knows the plans for the trip and knows what to do should they become concerned for the crews' well-being. The Irish Coast Guard has a Yacht and Boat safety scheme and all vessels planning to sail off-shore are encouraged to submit a Sail Plan before commencing the voyage. In addition, the Irish Coast Guard reminds all vessels that they should pass TR messages via their nearest Coast Radio Station. There is no charge for this service. Please note, however, that overdue reporting remains the responsibility of the vessels shore contact. The Irish Coast Guard will not initiate overdue procedures on the basis of TR messages.

Appendix 7.18 Marine Notice No. 10 of 2016 and Marine Notice No. 32 of 2019.



Marine Notice No. 10 of 2016

Notice to all owners, masters and users of pleasure and recreational craft.

Lifejackets and Buoyancy Aids – Main Points

This Marine Notice is primarily addressed to pleasure and recreational craft owners, masters and users. It provides a brief summary of the **legal requirements** in relation to the wearing and carrying of lifejackets and buoyancy aids, the **penalties** arising from non-compliance, as well as **advice** on the selection and maintenance of Personal Flotation Devices.

The term “personal flotation device” (PFD) covers all forms of lifejackets and buoyancy aids which, when correctly worn and used in water, will provide buoyancy and increase the likelihood of survival. A lifejacket is designed to prevent drowning and must be capable of returning the user to the surface as quickly as possible and of keeping the person afloat, permitting breathing while waiting for help. Buoyancy aid clothing ensures a degree of buoyancy and support in the water while enabling the user to swim or take action to escape from danger.

Personal Flotation Devices and the Law – PFD Regulations

The Pleasure Craft (Personal Flotation Devices and Operation) (Safety) Regulations 2005 ([S.I. No. 921 of 2005](#)), as amended by the Pleasure Craft (Personal Flotation Devices and Operation) (Safety) (Amendment) Regulations 2012 ([S.I. No. 349 of 2012](#)), apply to pleasure craft being operated in Irish waters and to any person on board a pleasure craft or being towed by a pleasure craft, or on board a craft or object of any kind being towed by a pleasure craft.

**There must be suitable PFDs for everyone on board any pleasure craft.
A suitable PFD must be worn at all times:**

- By anyone on board any moving pleasure craft (not tied up or made fast) that is under 7 metres in length, including personal watercraft (jet-skis);
- By anyone under the age of 16 years on board any type of moving pleasure craft;
- By anyone in another craft or on any other device (e.g. skis, donuts, etc.) being towed by a pleasure craft.

Except

- Immediately prior to, during and after swimming from a stationary pleasure craft;
- When putting on, wearing or taking off diving equipment on a stationary pleasure craft.

It is recommended that:

- Anyone alone on board a pleasure craft should wear a PFD at all times regardless of weather conditions, the size of the pleasure craft or whether it is made fast or at anchor;
- PFDs, if required to be carried, are stored in a readily accessible position;
- PFDs should be fitted with hold-down devices such as crotch straps or thigh straps to maximise lifesaving potential and reduce the risk of the PFD riding up on the user;

Appendix 7.18 Marine Notice No. 10 of 2016 and Marine Notice No. 32 of 2019.

- Persons should wear lifejackets at all times while on open decked pleasure craft over 7 metres in length not fitted with inherent buoyancy.

Failure to comply with the legal requirements – Fixed Payments and Fines

Where an authorised officer has reasonable grounds for believing that a person is committing or has committed an offence under the PFD regulations, he or she may serve a fixed payment notice in the prescribed form on the person in question. The person who is alleged to have committed the offence may pay €150 during the period of 21 days from the date of the notice.

Failure to pay the €150 within the 21 days will lead to the institution of prosecution proceedings and, on summary conviction, to a fine not exceeding €5,000.

Selection and use of Personal Flotation Devices

Pleasure and recreational craft owners should select PFDs that are appropriate to:

- the particular circumstances in which they will be used (e.g. area of operation, sea state, weather, ease of use);
- the type of risks likely to be encountered (e.g. sudden immersion due to capsizing);
- other factors (e.g. type and buoyancy of clothing worn, chemical exposure);

PFDs should be worn over all clothing and not underneath. PFD users should be familiar with the correct use and operation of their PFDs.

Servicing and maintenance of Personal Flotation Devices

Servicing of PFDs should only be carried out by manufacturers/approved agents in accordance with the manufacturer's instructions, but users should still carry out regular safety checks prior to each use.

PFD users should not use PFDs with expired components and should remove PFDs from the boat and refer to an approved service agent if there are any concerns about a PFD.

Conformity Marking of Personal Flotation Devices

- Every PFD made available on the European Union market should be CE marked.
- Every survival lifejacket should be marked with the "ship's wheel" mark.

Further Information

For more detailed information on lifejackets and buoyancy aids, please consult [Marine Notice No. 45 of 2012](#) (Lifejackets and Buoyancy Aids). [Marine Notice No. 39 of 2013](#) (Wear a Personal Flotation Device (PFD) and increase your chance of survival in the event of entering water) and [Marine Notice No. 48 of 2015](#) (Personal Flotation Device (PFD) Requirements) provide information on the wearing and carrying of PFDs in the fishing and commercial vessel sectors.

Appendix 7.18 Marine Notice No. 10 of 2016 and Marine Notice No. 32 of 2019.



**An Roinn Iompair,
Turastóireachta agus Spóirt**
Department of Transport,
Tourism and Sport

Marine Notice No. 32 of 2019

This Marine Notice replaces Marine Notice Nos. 45 of 2012 and 10 of 2016.

Notice to all owners, masters and users of pleasure craft and personal watercraft

**Personal Flotation Devices for Pleasure Craft and
Personal Watercraft**

1. Purpose

The purpose of this Marine Notice is to highlight the requirements for the carriage, certification, selection and wearing of Personal Flotation Devices (PFDs) for pleasure craft and personal watercraft. The Marine Notice also contains recommendations on correct use for users of Personal Flotation Devices.

2. What is a Personal Flotation Device?

A PFD is:

- a lifejacket that is  marked¹ or  wheel marked², or
- a buoyancy aid that is  marked.

Tables B and C of this Marine Notice provide further information on the differences between a lifejacket and a buoyancy aid and associated use.

3. Personal Flotation Device Regulations

The *Pleasure Craft (Personal Flotation Devices and Operation) (Safety) Regulations 2005 (S.I. No. 921 of 2005)* as amended by the *Pleasure Craft (Personal Flotation Devices and Operation) (Safety) (Amendment) Regulations 2012 (S.I. No. 349 of 2012)* and the *Pleasure Craft (Personal Flotation Devices and Operation) (Safety) (Amendment) Regulations 2018 (S.I. No. 400 of 2018)*, apply to pleasure craft being operated in Irish waters and to:

- any person on board a pleasure craft;
- any person being towed by a pleasure craft, or on board a craft or object of any kind being towed by a pleasure craft.

¹ Lifejackets and buoyancy aids that are marked with the CE conformity marking consisting of the initials 'CE' taking the form shown in the specimen in Annex II of Regulation (EC) 765/2008 of 9 July 2008.

² Lifejackets that have the mark of conformity in the form of the wheel mark symbol set out in Annex I to Council Directive 2014/90/EU of 23 July 2014.

Appendix 7.18 Marine Notice No. 10 of 2016 and Marine Notice No. 32 of 2019.

Table A of this Marine Notice provides further details on the application of the regulations to particular types/size of craft and sets out the carriage, certification and wearing requirements for PFDs on pleasure craft and personal watercraft.

There must be suitable PFDs for everyone on board any pleasure craft.

Failure to comply with the legal requirements – Fixed Payments and Fines:

Where an authorised officer has reasonable grounds for believing that a person is committing or has committed an offence under the PFD regulations, he or she may serve a fixed payment notice in the prescribed form on the person in question. The person who is alleged to have committed the offence may pay **€150** during the period of 21 days from the date of the notice. Failure to pay the €150 within the 21 days will lead to the institution of prosecution proceedings and, on summary conviction, to a fine not exceeding €5,000.

4. Selection of Personal Flotation Devices

When selecting a PFD, it is very important to select the correct device that is suited to the particular conditions and circumstances in which it will be used. Reference should be made to Tables B, C and D of this Marine Notice, which set out the various PFD performance levels available and their associated description of use.

5. Recommendations for correct use of a Personal Flotation Device

- Users should read and understand the manufacturers' instruction manual when they acquire a new PFD as each device may have specific user instructions.
- **PFDs should be worn over all clothing and not underneath.** This is to ensure that there is sufficient space for the device to inflate and that the user's breathing is not restricted.
- PFDs should be worn in the **correct position** on the torso as per the manufacturer's instructions. Hold-down devices can greatly assist in keeping the PFD in the correct position, as detailed below.
- Users should be fully **familiar with the operation of their inflatable PFDs** both manually and automatically.
- **Automatically inflatable PFDs**, which operate by means of a soluble bobbin, may activate in error if left in a damp condition. When inflatable PFDs are not being worn, they should be hung to dry vertically to ensure that all moisture drains away from the bobbin. Covers are available which reduce the problem of accidental inflation.
- Whilst not a requirement of the PFD regulations, it is recommended that anyone alone on board a craft should **wear a PFD at all times** regardless of weather conditions, the size of the craft or whether the craft is made fast to the shore or at anchor.
- It is recommended that all persons should wear a lifejacket at all times while on an open pleasure craft or on the deck of a decked pleasure craft.
- Where PFDs are required to be carried on board a craft, it is recommended that they are stored in a **readily accessible position** which may save time in an emergency situation.

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- It is recommended that a PFD should be fitted with **hold-down devices such as crotch straps or thigh straps** which should be worn to maximise lifesaving potential and reduce the risk of the PFD riding up on the user, potentially moving it to an incorrect position. Some PFDs are sold with hold-down devices provided and others are sold with the hold-down device as an optional extra.
- Please see **Appendix 1** of this Marine Notice regarding the effect of **Cold Water Shock** and the benefits of a correctly worn lifejacket.

6. Inspection and Servicing of Personal Flotation Devices

PFDs have a limited lifespan and require regular inspection and servicing in accordance with the manufacturer's instructions. Servicing should only be carried out by the manufacturers or their approved agent.

Users of PFDs should ensure that the device is inspected prior to each use as per the manufacturer's instructions. The inspection, as a minimum, should include:

- Inspection of harness straps/stitching for damage/wear;
- Inspection of external lining for wear/damage;
- Checking that all buckles are correctly adjusted;
- Checking that all zips, buckles, fasteners, webbing straps and lights (if fitted) are functioning correctly;
- Checking all hold-down devices attached to the PFD, if fitted;
- Inflatable lifejackets – refer to manufacture's user instructions with particular reference to the CO2 gas firing cylinder;
- Checking any marked expiry dates to confirm that there are no expired components.

If any concern exists regarding a PFD or a component following a user's inspection, it should not be used and should be brought to an approved service agent for servicing.

This is an information notice which serves to draw attention to the relevant legislation and is not a legal interpretation of the legislation.

Appendix 7.18 Marine Notice No. 10 of 2016 and Marine Notice No. 32 of 2019.

Table A – Personal Flotation Devices: Certification, carriage, selection and wearing requirements

LENGTH OVERALL of craft	PFD CERTIFICATION AND CARRIAGE REQUIREMENTS <i>See notes (1) and (2)</i>	SELECTION OF PERSONAL FLOTATION DEVICES	REQUIRED WEARING OF PERSONAL FLOTATION DEVICE		
			PLEASURE CRAFT <i>see note (3)</i>		PERSONAL WATERCRAFT <i>See note (6)</i>
			OPEN CRAFT <i>See note (4)</i>	DECKED CRAFT <i>See note (5)</i>	
Less than 4 metres	 For all persons	Refer to Tables B, C and D.	All persons	All persons while on deck	All persons
Less than 7 metres	 For all persons	Refer to Tables B, C and D.	All persons	All persons while on deck	Not applicable
7 metres or greater	 For all persons	Refer to Tables B, C and D.	All persons under 16 years of age	All persons under 16 years of age while on deck	Not applicable
Over 13.7 metres	 For all persons <i>See note (7)</i>	Refer to Table C.	All persons under 16 years of age	All persons under 16 years of age while on deck	Not applicable
Notes:					
(1) Means lifejackets and buoyancy aids that are marked with the CE conformity marking consisting of the initials 'CE' taking the form shown in the specimen in Annex II of Regulation (EC) 765/2008 of 9 July 2008.					
(2) Means lifejackets that have the mark of conformity in the form of the wheel mark symbol set out in Annex I to Council Directive 2014/90/EU of 23 July 2014.					

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(3) Does not apply to:

- a person on board a pleasure craft (other than a personal watercraft), which is not under way, when the person is wearing, putting on, or taking off, scuba diving equipment, or is about to engage in, or has just completed swimming (including snorkelling) from the craft;
- The PFD regulations do not apply to rowers in boats which are designed and specifically used for rowing in boat races and are capable of being entered into regattas or other events recognised by the Irish Amateur Rowing Union, and of a design and type in respect of which events are held in the Olympic Games or other international rowing regattas.

(4) "Decked craft" means a pleasure craft which is not an open craft.

(5) "Open craft" means a pleasure craft which does not have a cabin or below deck facilities for the use of persons and where seating, or any place on the craft used for seating, is exposed or partially exposed to the elements.

(6) "Personal watercraft" means a craft of less than 4 metres in length which uses an internal combustion engine having a water jet pump as its primary source of propulsion, and which is designed to be operated by a person or persons sitting, standing or kneeling on, rather than within the confines of, a hull.

(7) Consideration to be given to the carriage of  marked lifejackets for use on deck in addition to  marked lifejackets.

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Table B - Selection of lifejackets

 LIFEJACKETS (INFLATABLE AND NON-INFLATABLE)	
<i>PERFORMANCE LEVEL</i>	<i>APPLICATION</i>
<p>LEVEL 275</p>  <p>Offshore, extreme conditions, special protective clothing, heavy equipment</p>	<p>This level is intended primarily for offshore use under extreme conditions. It is also of value to those who are wearing clothing which traps air and which may adversely affect the self-righting capacity of the lifejacket. It is designed to ensure that the user is floating in the correct position with his/her mouth and nose clear of the surface of the water.</p>
<p>LEVEL 150</p>  <p>Offshore, foul weather clothing</p>	<p>This level is intended for general application or for use with foul weather clothing. It will turn an unconscious person into a safe position and requires no subsequent action by the user to maintain this position.</p>
<p>LEVEL 100</p>  <p>Sheltered waters, light clothing</p>	<p>This level is intended for those who may have to wait for rescue, but are likely to do so in sheltered water. The device should not be used in rough conditions.</p>
 LIFEJACKETS (INFLATABLE AND NON-INFLATABLE)	
<i>APPLICATION</i>	
<p>Survival lifejackets that have the mark of conformity in the form of the wheel mark symbol set out in Annex I to Council Directive 2014/90/EU of 23 July 2014. Refer to Note (7) from Table A.</p>	

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Table C - Selection of buoyancy aids

 BUOYANCY AIDS	
<i>PERFORMANCE LEVEL</i>	<i>APPLICATION</i>
<p>LEVEL 50</p>  <p>Swimmers only, sheltered waters, help at hand, limited protection against drowning, not a lifejacket.</p>	<p>This level is intended for use by those who are competent swimmers and who are near to bank or shore, or who have help and a means of rescue close at hand. These garments have minimal bulk, but they are of limited use in disturbed water, and cannot be expected to keep the user safe for a long period of time. They do not have sufficient buoyancy to protect people who are unable to help themselves. They require active participation by the user.</p>

Table D - Special purpose lifejackets and buoyancy aids

 SPECIAL PURPOSE LIFEJACKETS AND BUOYANCY AIDS	
<i>PERFORMANCE LEVEL</i>	<i>APPLICATION</i>
<p>LEVEL 275 LEVEL 150 LEVEL 100 LEVEL 50</p>	<p>Lifejackets and buoyancy aids that have different levels of support but have modifications related to special applications for use, e.g. firefighting. These applications shall not relate to essential requirements such as in-water performance, stability and safety in use. The specific conditions for use shall be stated on their label to maintain essential requirements. Users should refer to the manufacturer's documentation for guidance on selecting this type of PFD.</p>

For any technical assistance in relation to this Marine Notice, please contact:
 The Marine Survey Office, tel: +353-(0)1-678 3400.
 For general enquiries, please contact the Maritime Safety Policy Division, tel: +353-(0)1-678 3418.
 Written enquiries concerning Marine Notices should be addressed to:
 Dept. of Transport, Tourism and Sport, Maritime Safety Policy Division, Leeson Lane, Dublin 2, D02 TR60, Ireland.
 email: MarineNotices@dtas.gov.ie or visit us at: www.dtas.gov.ie

Irish Maritime Administration,
 Department of Transport, Tourism and Sport,
 Leeson Lane, Dublin 2, D02 TR60, Ireland.

29/08/2019

Appendix 7.18 Marine Notice No. 10 of 2016 and Marine Notice No. 32 of 2019.

Appendix 1:

Cold water shock kills

Stage 1: Cold shock (3 – 5 minutes)

Stage 2: Swimming failure (3 – 30 minutes)

Stage 3: Hypothermia (after 30 minutes)

Stage 4: Post rescue collapse (during or hours after rescue)

**What does a correctly sized and worn lifejacket DO
for YOU?**

Makes YOU feel safe

Keeps YOU alive

Stops YOU from panicking

Supports YOU even when unconscious

Supports and protects YOU until help arrives

But only if you keep YOUR lifejacket from riding-up!

Appendix 7.19 Code of Practice: The Safe Operation of Recreational Craft, 2017 - updates made in 2019 to the 2017 edition.

Updates to the 2017 Edition of the Code of Practice for the Safe Operation of Recreational Craft [at 6 November 2019]

Page No.	Section	Existing Text	Revised Text	Explanatory Notes
11	Chapter 1 Legislation, Table A	Pleasure Craft (Personal Flotation Devices and Operation) (Safety) Regulations 2005, as amended (S.I. No. 921 of 2005 as amended by S.I. No. 349 of 2012)	Pleasure Craft (Personal Flotation Devices and Operation) (Safety) Regulations 2005, as amended (S.I. No. 921 of 2005 as amended by S.I. No. 349 of 2012 and S.I. No. 400 of 2018)	Update to reflect the making of the Pleasure Craft (Personal Flotation Devices and Operation) (Safety) (Amendment) Regulations 2018 (S.I. No. 400 of 2018) which amend S.I. No. 921 of 2005.
14	Chapter 1, Legislation, 1.2.4 Wearing of Personal Flotation Devices/ Lifejackets	Pleasure Craft (Personal Flotation Devices and Operation) (Safety) Regulations 2005 (S.I. No. 921 of 2005), as amended by the Pleasure Craft (Personal Flotation Devices and Operation) (Safety) (Amendment) Regulations 2012 (S.I. No. 349 of 2012).	Pleasure Craft (Personal Flotation Devices and Operation) (Safety) Regulations 2005 (S.I. No. 921 of 2005), as amended by the Pleasure Craft (Personal Flotation Devices and Operation) (Safety) (Amendment) Regulations 2012 (S.I. No. 349 of 2012) and the Pleasure Craft (Personal Flotation Devices and Operation) (Safety) (Amendment) Regulations 2018 (S.I. No. 400 of 2018).	Update to reflect the making of the Pleasure Craft (Personal Flotation Devices and Operation) (Safety) (Amendment) Regulations 2018 (S.I. No. 400 of 2018) which amend S.I. No. 921 of 2005.

Appendix 7.19 Code of Practice: The Safe Operation of Recreational Craft, 2017 - updates made in 2019 to the 2017 edition.

Page No.	Section	Existing Text	Revised Text	Explanatory Notes
17	Chapter 1, Legislation, 1.2.7 Marine Equipment Directive	In the case of a PFD, ensure it always carries the approval CE mark shown opposite.	In the case of a PFD, ensure it always carries the approval CE mark shown opposite or the approval wheel mark shown above.	Correction.
111	11.4 Marine VHF Communications Network			Map of Coastguard Stations to be updated to include the new Clew Bay Coast Guard radio (VHF Channels 16, 67, 05 & DSC 70) which comes under the Malin Head Controlled Radio Stations. Please see <u>Marine Notice No. 40 of 2019</u> which contains a copy of the updated map in Appendix 1.
167	Appendix 5, Personal Flotation Devices/ Lifejackets, Jacklines and Safety Harnesses Types of personal	The term personal flotation device (PFD) is an all-encompassing term, which covers all forms of lifejackets and buoyancy aids intended to help keep a person afloat in the water. These range from "CE" marked lifejackets	The term personal flotation device (PFD) is an all-encompassing term, which covers all forms of lifejackets and buoyancy aids intended to help keep a person afloat in the water. These range from "CE" marked or "wheel	Correction.

Appendix 7.19 Code of Practice: The Safe Operation of Recreational Craft, 2017 - updates made in 2019 to the 2017 edition.

Page No.	Section	Existing Text	Revised Text	Explanatory Notes
170	flotation devices (PFD/Lifejackets) Appendix 5, Personal Flotation Devices/ Lifejackets, Jacklines and Safety Harnesses	through to "CE" marked buoyancy aids. 4. The device has on it the CE conformity marking consisting of the initials "CE" taking the form of the specimen given in Annex IV of Council Directive 89/686/EEC of 21 December 1989 (as amended by Council Directive 93/68/EEC of 22 July 1993 and Council Directive 96/58/EC of the European Parliament and the Council of 3 September 1996).	marked" lifejackets through to "CE" marked buoyancy aids. 4. The device has on it the CE conformity marking consisting of the initials "CE" taking the form of the specimen given in Annex II of Regulation (EC) 765/2008 of 9 July 2008 or the mark of conformity in the form of the symbol set out in Annex I to Council Directive 2014/90/EU of 23 July 2014.	Update as Directive 89/686/EEC, personal protective equipment, has been repealed with effect from 21 April 2018.
170	Appendix 5, Personal Flotation Devices/ Lifejackets, Jacklines and Safety Harnesses	Please Note: Some inflatable PFDs come provided with crotch straps and others are sold with the crotch strap as an optional extra. To maximise the lifesaving potential of inflatable PFDs, it is recommended that a crotch strap (or leg straps) should always be	Please Note: Some inflatable PFDs come provided with crotch straps and others are sold with the crotch strap as an optional extra. To maximise the lifesaving potential of inflatable PFDs, it is recommended that a crotch strap (or leg straps) should always be	Update: Marine Notices Nos. 10 of 2016 and 45 of 2012 have been replaced by <u>Marine Notice No. 32 of 2019</u> .

Appendix 7.19 Code of Practice: The Safe Operation of Recreational Craft, 2017 - updates made in 2019 to the 2017 edition.

Page No.	Section	Existing Text	Revised Text	Explanatory Notes
173	Appendix 5 (Personal Flotation Devices/ Lifejackets, Jacklines and Safety Harnesses)	worn, over the top of all clothing. For further details see Marine Notice Nos. 45 of 2012, 39 of 2013, 48 of 2015, 10 of 2016 and 27 of 2016.	worn, over the top of all clothing. For further details see Marine Notices Nos. 39 of 2013, 48 of 2015, 27 of 2016 and 32 of 2019.	Update: Marine Notice No.10 of 2016 has been replaced by Marine Notice No. 32 of 2019.
194	Appendix 11, Glossary of Terms	Please Note: Wearers must be aware of the legal requirements in relation to the wearing of PFDs and the penalties arising from non-compliance. For further details see Chapter 1 and Marine Notice No. 10 of 2016. Ampere Hertz Capacity	Please Note: Wearers must be aware of the legal requirements in relation to the wearing of PFDs and the penalties arising from non-compliance. For further details see Chapter 1 and Marine Notice No. 32 of 2019. Ampere Hour Capacity	Correction.

Appendix 7.20 Transcripts of Emergency Calls.

Emergency calls made to Coast Guard

Transcript of recording of an emergency call made to The Irish Coastguard /MRSC Malin Head via ECAS Navan on 17th July 2018. The call was made at 10:16 (09:16Z) on 17th July 2018 from UK mobile number 0044 749xxxxxx. Time elapsed after 10:16 hrs in seconds

00 Voice – words not decipherable
04 ECAS Operator - Emergency, which service
05 Caller - Hello,
07 Operator – Do you need Garda, Ambulance, Fire or Coastguard
08 Caller – hello
09 Indecipherable voices in background
10 Operator (Raised Voice) - Do you need Garda, Ambulance, Fire or Coastguard
13 Caller – we need Coastguard
15 Operator – Coastguard, Thank You
16 Operator – Do you need the Coastguard in Donegal
17 Caller – yes, off Malin head (pause) Boats sinking
24 Ring Tone - caller in background – “boats sinking.”
28 MH CG - Answering
29 Operator- Customer 4 mobile
31 MH-CG - yes
32 MH-CG - Hello, hello
33 sounds, faint voices but no decipherable words
35 MH CG - Hello
37 MH-CG – Hello, hello
38 Buzzing sound
40 MH-CG – Hello, hello -, buzzing sound in background
48 MH-CG – Hello, hello -, buzzing sound in background
50 MH-CG – Hello, hello -, buzzing sound in background
52 MH-CG – Hello, hello -, buzzing sound in background
53 – 59 Buzzing sounds
1:05 MH CG – Operator, operator - Buzzing sounds in background
1:09 Click
1:10 Operator- Hello
1:11 click

Appendix 7.20 Transcripts of Emergency Calls.

Coast Guard call log

Initial 999 call to Malin Head	
Malin Head to ECAS 0920	These two files are the same call, our NICE system splits calls into segments
Malin Head to ECAS 0920 Part 2	
ECAS Navan to Malin 0922	
ECAS Navan to Malin 0900 Part 2	These two files make up one call
ECAS Ballyshannon to Malin 0923	This was received at the same as the call from ECAS Navan but was answered by another staff Watch Officer
ECAS full recording	Shared by ECAS to IRCG this call contains the initial stages of the call before it was connected to MRSC Malin

Transcripts (numbers on left are seconds elapsed)

09:20 MHCG to ECAS Ballyshannon

25 ECAS Ballyshannon [redacted] speaking
 26 CG - Hi good morning [redacted] [redacted] speaking from Malin Hd.
 30 ECAS - Hi
 30 CG - I had a call there at 0916 Zulu, 1016 local
 39 ECAS - 1016 aye
 40 CG - from a northern number – Balleykenny Donegal
 48 ECAS - yes
 49 CG - (they asked for the?) coastguard
 53 ECAS - I will have to have a wee look at that, have you a number
 58 CG - Aye I do, a northern number 0044.....

Total time 33 seconds

09:22 ECAS Navan to MHCG

09 CG - Malin Head CG
 10 ECAS - Hi this is [redacted] in ECAS Navan
 12 CG - Hi
 13 ECAS - One of our operators just put through a call through to you for Malin Head and the line was really bad, just want to make sure you got the phone number.
 23 CG - Yes, I rang Ballyshannon, did not know it was Navan
 28 ECAS - You rang Ballyshannon?
 34 CG - We got the phone number, the line cleared, the line went dead.

Appendix 7.20 Transcripts of Emergency Calls.

36 ECAS - yes it sounded like really bad reception

40 CG - Ay and the outside call the number back a few times now and it is just going to voice mail and the voice mail is saying DK can't take your call right now

52 ECAS - Ok that is all I have is Malin Head Ballykenny in Donegal (this information is from mast location on operators screen)

56 CG - can't seem to get through to the number

1:00 ECAS - yes

1:02 CG - There is nothing else I can do now, I will keep trying the number, maybe the phone might ring, maybe I might get reception

ECAS - May I just get your name please

1:13 CG - [REDACTED]

Total time 1 minute 13 seconds

10:23 ECAS Ballyshannon to CG Malin Hd

10 CG - Malin Head Coast Guard

11 ECAS - Hi this is ... from Ballyshannon can I speak to [REDACTED] please

14 CG - Aye, [REDACTED] is talking to Navan, there

17 ECAS - yes, yes, they just requested the coastguard Donegal off Malin Head, and that's all they said to the operator.

20 CG - Aye, we tried ringing the number, it's a UK mobile and just going to voicemail

21 ECAS - Yes

22 CG - Ok that's fine

Total Time 22 seconds

Appendix 7.20 Transcripts of Emergency Calls.

09:20 MHCG to ECAS Ballyshannon

25 ECAS Ballyshannon [REDACTED] speaking
 26 CG - Hi good morning [REDACTED], [REDACTED] speaking from Malin Hd.
 30 ECAS -Hi
 30 CG - I had a call there at 0916 Zulu 1016 local
 39 ECAS -1016 aye
 40 CG - from a northern number – Balleykenny Donegal
 48 ECAS -yes
 49 CG -coastguard
 53 ECAS - I will have to have a wee look at that, have you a number
 58 CG - Aye I do, a northern number 0044

09:22 ECAS Navan to MHCG

09 CG - Malin Head CG
 10 ECA S- Hi this is [REDACTED] n ECAS Navan
 12 CG - Hi
 13 ECAS - One of our operators just put through a call through to you for Malin Head and the line was really bad, just want to make sure you got the phone number.
 23 CG - Yes I rang Ballyshannon, did not know it was Navan
 28 ECAS - You rang Ballyshannon?
 34 CG - We got the phone number, the line cleared, the line went dead.
 36 ECAS - yes it sounded like really bad reception.
 40 CG - Ay and the outside call the number back a few times now and it is just going to voice mail and the voice mail is saying [REDACTED] can't take your call right now
 52 ECAS - Ok that is all I have is Malin Head , Ballykenny in Donegal – (the phone mast location)
 56 CG - I can't seem to get through to the number
 1:00 ECAS -yes
 1:02 ECAS - There is nothing else I can do now, I will keep trying the number, maybe the phone might ring, maybe I might get reception
 ECAS - May I just get your name please
 1:13 [REDACTED]

MSA 2000 SECTION 36 PROCESS

Section 36 of the Merchant Shipping (Investigation of Marine Casualties) Act, 2000

It is a requirement under Section 36 that:

- (1) Before publishing a report, the Board shall send a draft of the report or sections of the draft report to any person who, in its opinion, is likely to be adversely affected by the publishing of the report or sections or, if that person be deceased, then such person as appears to the Board best to represent that person's interest.
- (2) A person to whom the Board sends a draft in accordance with subsection (1) may, within a period of 28 days commencing on the date on which the draft is sent to the person, or such further period not exceeding 28 days, as the Board in its absolute discretion thinks fit, submit to the Board in writing his or her observations on the draft.
- (3) A person to whom a draft has been sent in accordance with subsection (1) may apply to the Board for an extension, in accordance with subsection (2), of the period in which to submit his or her observations on the draft.
- (4) Observations submitted to the Board in accordance with subsection (2) shall be included in an appendix to the published report, unless the person submitting the observations requests in writing that the observations be not published.
- (5) Where observations are submitted to the Board in accordance with subsection (2), the Board may, at its discretion -
 - (a) alter the draft before publication or decide not to do so, or
 - (b) include in the published report such comments on the observations as it thinks fit.'

The Board reviews and considers all observations received whether published or not published in the final report. When the Board considers an observation requires amendments to the report that is stated beside the relevant observation. When the Board is satisfied that the report has adequately addressed the issue in the observation, then the observation is 'Noted' without comment or amendment. The Board may make further amendments or observations in light of the responses under Section 36. 'Noted' does not mean that the Board either agrees or disagrees with the observation.

Within the Section 36 process clarifications were needed in order to produce a robust report which required the draft report to issue for a second time. Some correspondence received by the MCIB in response to the first draft report make reference to paragraph numbers as they appear in that draft. It should be noted that some paragraph numbers in this final report are different to the first draft. Where necessary the MCIB comment inserted in each submission makes reference to any change in paragraph order.

8. SECTION 36 PROCESS - CORRESPONDENCE RECEIVED

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Note: The names and contact details of the individual respondents have been obscured for privacy reasons.

Correspondence 8.1 Irish Coast Guard and MCIB response

An Roinn Iompair
Turasóireachta agus Spóirt
Department of Transport,
Tourism and Sport



13th September '19

Ref: MCIB/12/280 [REDACTED]

Chairperson MCIB.

Dear [REDACTED]

MCIB/12/280 Draft report - Portronan Pier

1. Further to your letter of 16th August I wish to advise that the Coast Guard (IRCG) has no observations on the factual content of the report. IRCG looks forward to following up on the report's recommendations.
2. In relation to recommendation para 6.2, we would request the Board to consider including an additional reference on the benefits of using PLBs and EPIRBs, as an emergency alerting system i.e. augmenting the reference to marine VHF radio.
3. The report documents (para 3.5) that the IRCG operator at MRSC Malin, who received the initial call, was on the line for a total of 41 seconds i.e. 37 seconds hailing the caller and a further 4 seconds endeavouring to speak to an ECAS operator. Given that no conversation whatsoever took place during this time and that the same operator made significant subsequent efforts (as documented in the report) to call the number back and placed a follow up call with ECAS, we would request that the report acknowledges the creditable effort made by the operator to follow up on a situation, with which negligible information was presented. This observation does not in any way seek to take issue with the report's findings or recommendations.

MCIB RESPONSE: Noted.

MCIB RESPONSE: Noted.

MCIB RESPONSE: Noted.

Yours sincerely,

Lána Liosain, Balle Átha Cliath, D02 TR60
Leeson Lane, Dublin, D02 TR60
www.dttas.gov.ie

Correspondence 8.2 Department of Communications, Climate Action and Environment and MCIB response

Roinn Cumarsáide, Gníomhaithe
ar son na hAeráide & Comhshaoil
Department of Communications,
Climate Action & Environment



24 September 2019

██████████
Chairperson
Marine Casualty Investigation Board
Leeson Lane
Dublin 2
D02 TR60

**Re: Draft Confidential Report into a Fatal incident off Portronan Pier, Co Donegal.
17 July 2018**

Dear ██████████

I am directed by the Minister to refer to your letter and draft report of 16 August last in the above regard. I would like to thank the Marine Casualty Investigation Board (MCIB) for the opportunity to respond afforded to the Department, and to re-affirm the Department's ongoing support to the MCIB's investigation into the incident.

At the outset the Department wishes to acknowledge the tragic nature of the events set out in the draft report and to convey condolences to all affected by the incident.

The Department understands that BT Communications Ireland Ltd (BT), the operator of the Emergency Call Answering Service (the ECAS), has made a detailed submission outlining its position as to the presentation of facts and findings in the draft report. The Department has received a copy of the BT submission and has noted its contents.

The Minister's statutory role with respect to the ECAS is set out in the Communications Regulation Act 2002 (as amended) which enables the Minister to enter a contract with a person to provide an emergency call answering service. In February 2018 a new contract was signed with BT to run the service following a procurement process.

The ECAS is responsible for answering all 112 and 999 calls and texts within Ireland, where it seeks to establish the location of an incident and transfer the call to the relevant emergency service.

MCIB RESPONSE: Noted.

29-31 Bóthar Adelaide, Baile Átha Cliath, D02 X285
29-31 Adelaide Road, Dublin, D02 X285
T +353 1 678 2000 | 1890 44 99 00
www.dccae.gov.ie

Correspondence 8.2 Department of Communications, Climate Action and Environment and MCIB response



The MCIB may wish to note that the ECAS system is kept continually under review with a view to enhancing its effectiveness. This is done in consultation with the emergency services through an emergency services forum, chaired by the Department.

The MCIB may also wish to note that, following consultation with all of the emergency services, an additional facility has been developed and brought into service in December 2018 whereby the ECAS can now play the first 45 seconds of call recordings via the Emergency Services Hotline to members of the emergency services after an emergency call has ended.

The Department of Transport Tourism and Sport contacted this Department on 7 August last seeking a nominee from the ECAS to participate on the National SAR Consultative Committee. On 12 August the Department nominated a suitable person from the ECAS to attend the Committee's meetings in the future.

Finally, the Department notes the Report's draft recommendations. Once the Report has been finalised, this Department will consider the Report's findings and will work with stakeholders including the Department of Transport, Tourism and Sport, the ECAS, the Irish Coast Guard and other emergency services to take all appropriate actions to guard against such a tragedy occurring in the future and will engage independent experts to input into this work and to audit its effective operation to ensure that the highest possible standards are being reached.

Yours sincerely,



National Digital Strategy and Telecommunications Market Contracts Division

MCIB RESPONSE: Noted.

Correspondence 8.3 BT ECAS and MCIB response



Strictly Private & Confidential

Secretary
Marine Casualty Investigation Board
Leeson Lane
Dublin
D02 TR60

Your reference: MCIB/12/280

12 September 2019

Re: Draft Confidential Report into a Fatal incident off Portronan Pier, Co Donegal 17 July, 2018 (“the Draft Report”) – observations from BT Communications Ireland Limited (BT), operator of the Emergency Call Answering Service (ECAS)

Dear Sirs

I refer to your letter of 16 August 2019, which enclosed a copy of the Draft Report and sought BT’s observations thereon. Our observations and comments on the Draft Report are set out in this letter.

In the first instance, and on behalf of BT Ireland and ECAS, I would like to extend our sincere condolences to the families of those who lost their lives in this tragic incident, and express our support for the work of the MCIB in this investigation.

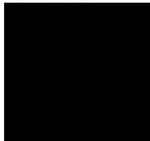
We confirm that our observations are submitted with the agreement of all ECAS personnel involved. Please note that all references to ECAS in this letter are references to BT’s role as operator of the ECAS on behalf of the Minister for Communications, Climate Action and Environment (“DCCA”).

MCIB RESPONSE:
Noted.

BT Ireland is certified to International Standards: Quality Standard ISO 9001:2008 and Environmental Standard EN 14001:2004



Directors:



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Correspondence 8.3 BT ECAS and MCIB response

BT's Observations

In summary, BT's submission is:

- I. The ECAS operator followed procedures in full as set out in Appendix 7.7 of the draft report.
- II. The Lead operators in Navan and Ballyshannon handled the calls as per the procedure annexed to this submission.
- III. Through the actions at I and II, ECAS provided the Coast Guard with the following information:
 - a. Mobile mast location information;
 - b. Townland of the mobile mast;
 - c. 'off Malin Head';
 - d. 'Malin Head';
 - e. the assistance of the Coast Guard was sought;
 - f. the phone number.
- IV. The inference in the draft report is that if the Coast Guard were told of 'boat sinking' that a search and rescue operation would have been launched. This is the only basis for the conclusions in 5.5 and 5.6 of the draft report. The draft report provides no details or procedures on the circumstances giving rise to a search and rescue operation being launched. Furthermore, the draft report gives no details on the decision of the CG to launch or not to launch a search and rescue operation, therefore it is not clear and no basis is provided in the draft report for the said inference to be drawn.
- V. We have provided detailed observations on each paragraph of the Draft Report in Annex 1. In addition, BT submits the following comments on the Draft Report. We request that both our observations and comments are taken into account and reflected in the final report that will issue. In a number of areas, the Draft Report is factually incorrect, or misrepresentative of certain facts applying to the actions of the ECAS personnel involved in this incident. As such, BT believes that the Draft Report will require significant amendment to ensure that the role of BT ECAS is not unfairly or incorrectly represented in the final report. This is in accordance with the principles of natural justice upon which this investigation is based.

MCIB RESPONSE: Noted - Appendix 7.7. is Appendix 7.11 in published report.

1. The Draft Report fundamentally misinterprets and misunderstands the role and scope of ECAS

- 1.1 ECAS was established by the Communications Regulation (Amendment) Act 2007 as a call answering service for each of the emergency services (Garda, Ambulance, Fire, Coast Guard and, in cases involving aircraft, Air Traffic Control). The stated role of ECAS is to respond to all incoming calls, identify and pass the call through to the appropriate emergency service as quickly as possible.
- 1.2 ECAS is the first line of the emergency response process, however its operators are not emergency service responders. ECAS is responsible for answering an emergency call within very short timescales filtering out calls that are non-genuine or erroneously made according to strict procedures, connecting the call to the emergency service requested by the caller, and providing the caller location recorded by the ECAS systems to the relevant emergency service. Its operators are not trained in any emergency services protocols, processes or procedures – ECAS processes relate solely to ensuring that calls are answered

MCIB RESPONSE: Noted.

Correspondence 8.3 BT ECAS and MCIB response

and routed appropriately, and that call details and location are electronically recorded and provided as the emergency services may require.

- 1.3 Once ECAS connects a caller to the emergency service, the ECAS operator will continue to monitor the call until such time as they are satisfied caller location has been confirmed by the Emergency Service and that there is no further information being sought by the Emergency Service (as per procedure “Call Handling Principles” set out in Appendix 7.7 of the Draft Report). However the ECAS operator will not participate in or interrupt the call in any way unless proactively requested by the emergency service, nor will they offer any information or detail in relation to the content of the call. Such is not the role of the ECAS operator and any interference could risk the quality and veracity of information that the emergency services obtain from the call.

- 1.4 The ECAS operator must proactively offer call playback in certain circumstances as the Draft Report suggests, however the Draft Report has erroneously omitted to reference that the operator cannot do this until “after the caller has cleared” (stated in the “Call Handling Principles” referenced above). This is significant in relation to this incident as the callers’ line was still active up until the time the Coast Guard left the call, and therefore there was no opportunity to proactively offer to replay the call recording.

- 1.5 Once a call is terminated, a separate procedure applies relating to “Active Calls” (which is a call that has ended but the incident is still ongoing and help has not arrived). We have annexed to this letter the extract for active calls communications from the relevant process (Communications between Emergency Services and ECAS).

The attached extract evidences the communications model for active call queries from emergency services, and BT is confident that each of its operators followed this procedure fully in relation to this incident, notwithstanding that the Coast Guard did not contact the designated hotline number for active call queries. As is evident from the procedure, the role of the ECAS operator is to verify the validity of the request, provide the information requested by the Coast Guard, confirm that the information is understood, and log the call details. The Coast Guard’s procedures (set out in Appendix 7.9 of the Draft Report) indicates that the Coast Guard call taker should “ensure you have all the information you need to pursue the incident, before terminating the call”.

- 1.5 For completeness, and given the clarity on the scope of the role of ECAS as set out above, BT would like the MCIB to record that in relation to this incident, the emergency call was answered by the ECAS operator within 1 second. Within 15 seconds of the call, she had identified that the caller required the services of the Coast Guard and had routed the call to the Coast Guard accordingly. Between 10.16am when the call was received and 10.24 am, ECAS operators had been in contact with the Coast Guard three times and on each occasion relayed the information that was required of them. At that point, given that the Coast Guard made no further attempt to contact ECAS, the involvement of ECAS in this incident ceased (until a call was made at 15.30 by a third party, which was answered and routed to Coast Guard by ECAS in accordance with procedure).

BT requires that the transcripts of the conversations between the Coast Guard and the two BT lead operators, which are available, be annexed to the final report as this is key information that was not referenced in the Draft Report.

MCIB RESPONSE: Noted.

MCIB RESPONSE: Noted. The transcripts of the emergency calls are attached at Appendix 7.20.

Correspondence 8.3 BT ECAS and MCIB response**1) The Draft Report contains a number of factual errors**

The Draft Report contains a number of factual errors relating to the actions of ECAS and ECAS operators. These factual errors will require correction for the final report in order to maintain the principles of natural justice on which this investigation is based. The factual errors are further described in our detailed observations on each paragraph of the Draft Report, but we would particularly draw the attention of the Board to the following:

- Statements in the Draft Report that ECAS was aware that certain information in the call recording had not been passed onto the Coast Guard are incorrect. All available location information, including mast location and various references to Malin Head (including a reference to “off Malin Head”) were provided to the Coast Guard (in accordance with the role of ECAS to assist with location information). Call detail other than location information is not relevant to the role of ECAS (which is to answer, route and locate a call to the best available information). As such, each operator was of the view that all relevant information had been transferred.
- Statements in the Draft Report that the ECAS answering operator breached procedure by not offering to replay the call recording on the initial call are incorrect. The ECAS Operator did not breach procedure as operators must not offer to replay a call until the caller has cleared the line, in this instance the Coast Guard operator ended the call at the same time the caller signal dropped and the ECAS Operator did not have the opportunity to replay the call.
- Statements in the Draft Report that the ECAS lead operators did not listen to the call recording in accordance with procedure are incorrect. Both operators did listen to the call recording. Navan listened to the call before contacting the Coast Guard while Ballyshannon listened to the call following an initial call from the Coast Guard. In any event procedure does not require lead operators to listen to call recordings when engaging with emergency services on active calls.
- Statements in the Draft Report that the functionality to replay calls directly to the emergency services was available but not enabled are incorrect. At the time of this incident, the ECAS system did not have any functionality to replay calls directly to the emergency services (after a call has ended). This functionality was introduced in December 2018.
- Statements in the Draft Report that the ECAS system did not identify the relevant ECAS centre as a result of changes that were implemented following the Tit Bonhomme incident are incorrect. In the past, ECAS did identify the relevant ECAS centre verbally on active calls but this was considered redundant information by the Emergency Services and was removed with their agreement. For this reason, a hotline number is provided to all emergency services so they can make contact with the correct lead centre for active calls

MCIB RESPONSE: Noted.

Correspondence 8.3 BT ECAS and MCIB response

(and so ECAS can verify that it is genuinely the emergency service that requires information). This procedure was not followed by the Coast Guard during this incident.

- Statements in the Draft Report that each of the ECAS Lead Operators “assumed the other centre had given the information to the Coast Guard” are incorrect. ECAS has not seen any evidence of an assumption made by either ECAS lead operator that the other had provided relevant information to the CG (ref response to 3.12). These two calls were made independently and almost simultaneously. They both dealt directly with the specific asks of the Coast Guard call taker to whom they were speaking.

2) The conclusions in the Draft Report relating to ECAS (namely 5.4 and 5.5) are based on facts that are erroneous (as described above), and as such are inaccurate and misleading in their output.

ECAS disagrees entirely with Conclusion 5.5 of the Draft Report. It is based on three points of information which are incorrect as stated above. ECAS operators acted properly within the scope of their role and ensured that the call was routed to the Coast Guard and the best available location provided. Conclusion 5.5 assumes that ECAS had an obligation to process additional information that was contained on the call recording and provide it to the Coast Guard. This is beyond the scope of ECAS.

ECAS strongly objects to the conclusion that may be drawn from paragraph 5.6 of the Draft Report that the failure by ECAS to transfer information to the Coast Guard resulted in the casualties being in the water for 5 hours and thus increased the severity of the incident. ECAS’s involvement in this incident was from 10.16 to 10.24, within which time the call was answered, routed and connected with the Coast Guard, and best available location information provided. No further contact was made with ECAS after 10.24am. ECAS was unaware of the decision and actions taken by the Coast Guard thereafter in terms of search and rescue.

BT believes that these conclusions in the Draft Report should be revisited and amended by MCIB in light of the information that we have provided, and BT is of the view that for these conclusions to remain in the final report unamended would be significantly and unfairly prejudicial to BT and its rights under the principles of natural justice.

3) Redaction of Sensitive Information Required

Appendix 7.8 of the Draft Report contains the Hotline Number for the emergency services to contact ECAS centres. For security reasons, BT requests the redaction of this number from the final report.

Our detailed observations to each paragraph of the Draft Report are contained at Annex 1 of this letter. BT is available to answer any further questions or provide any further information as the MCIB may require.

MCIB RESPONSE: Noted. The Report has been amended.

MCIB RESPONSE: Noted. Appendix 7.8 is Appendix 7.16 in final report.

MCIB RESPONSE: Noted.

Correspondence 8.3 BT ECAS and MCIB response

In the meantime we await publication of the final report and confirm our preparedness to work with the Minister and relevant stakeholders on any findings addressed to the ECAS.

MCIB RESPONSE: Noted.

Yours sincerely


Head of ECAS Operations

Correspondence 8.3 BT ECAS and MCIB response

Annex 1 – Detailed Observations

Paragraph	
1 (Summary)	No comment
2 (Factual Information)	No comment
3 Narrative	
3.1	No comment
3.2	No comment
3.3	No comment
3.4	No comment
3.5	<p>The 999 Call was handled as per procedure at ECAS Navan. The Call was correctly routed to the Coast Guard (CG) as caller clearly requested CG, and location was identified via the system and confirmed by the operator as being in Donegal.</p> <p>Upon confirmation that the incident was located in Co. Donegal and requiring Coast Guard assistance, the ECAS operator immediately began routing the call. The Operator confirmed that help was required in Co. Donegal and ensured that the call was routed to CG.</p> <p>It is noted that the CG hailed the caller for 37 seconds, then hailed the operator for 4 seconds before ending the call. The operator is recorded responding to CG one second after the CG ended the call (i.e. 5 seconds after being hailed). In this regard, please note the following:</p> <ul style="list-style-type: none"> - The operator microphone was muted whilst the CG was hailing the caller (this fact is confirmed in a Garda statement provided by the operator on 13 November 2018). - Operators are trained and instructed to go on listen/hold while monitoring call between caller and the emergency services i.e. they mute their microphones while the ES is attempting to communicate with the caller so as to avoid introducing further interference into the conversation. - The operator simply did not have adequate time to unmute her microphone and respond to the CG before CG ended the call. <p>It is noted that the CG operator did not have an indication as to which ECAS centre was forwarding the emergency call. In this regard, please note that the lead ECAS centre is never specifically identified during a call unless requested (the answering centre is solely dictated by next operator availability, to maximise availability for call answering).</p>

MCIB RESPONSE: Noted.

Correspondence 8.3 BT ECAS and MCIB response

	Emergency services should contact the lead centre using a hotline number, acknowledged in Appendix 7.8 of the report in IRCG SAR OP Notice 5/18 (Guidelines on Processing Incomplete Calls), Section (d). The hotline number was not called in this instance and the Coast Guard incorrectly assumed that ECAS Ballyshannon had answered the call.
3.6	No comment
3.7	As stated above, the CG should have contacted the hotline number as per procedure. This would have routed the call to the operational ECAS lead Centre in Navan. Instead CG chose to dial the office number at ECAS Ballyshannon, which was answered by the Ballyshannon Lead Operator.
3.8	The ECAS Navan operator had concerns about the call and signalled to her Lead Operator for assistance. She requested that the Lead Operator listen to the call and then to contact CG to ensure that they had the caller's correct phone number. Her concern arose from how the call had progressed and its abrupt ending.
3.9	This is incorrect. The ECAS lead operator did listen to the call recording before contacting the CG.
3.10	<p>During the call made by Navan Lead Operator to CG, the location was confirmed twice as 'Malin Head'. She further confirmed a location of 'Ballykenny' from the records of base station coverage (indicating a centre of coverage for the serving base station mast). This was the best location information in the possession of ECAS.</p> <p>In making the call to the CG, the Navan lead operator sought to ensure that CG was aware that ECAS believed that this was an emergency situation and that the CG had as much location detail as ECAS had to offer. It would be contrary to procedure for an ECAS operator to lead the emergency services in a conversation of this type (for example by suggesting appropriate next steps), as the sole aim of ECAS is to ensure that the relevant emergency services has the information it requires in the fastest time possible. The CG did not request any further detail or request information of the initial call recording. At the time and having proactively called the CG again, ECAS staff were satisfied that CG was aware of the seriousness of the incident and had the best location information to hand and enough detail to decide on the best course of action. This is reinforced by the actions of the Navan operator and Lead Operator.</p>
3.11	The statement that the lead operators at Navan and Ballyshannon did not listen to the call recording is incorrect. Both lead operators listened to the call before contacting the CG. In the case of the Ballyshannon lead operator, our records (and relevant Garda statements) show that she accessed the call recording at 10.23 and she returned the call to CG at 10.23 i.e. within a minute of listening to the call. The Timings of these events and statements from the Ballyshannon lead operator show that she very quickly listened to the call in order to confirm the information requested by the Coast Guard

MCIB RESPONSE: Noted.

Correspondence 8.3 BT ECAS and MCIB response

	in their initial call to Ballyshannon i.e. "Did the caller specifically ask for the Coast Guard". This fact was confirmed from the call recording and the Ballyshannon lead operator immediately called Malin CG with this information as requested, and further confirmed that the specified location was "off Malin Head".
3.12	BT ECAS has not found evidence to support the statement in the Draft Report that each of the Lead Operators "assumed the other centre had given the information to the CG". ECAS has not seen any evidence of an assumption made by either ECAS lead operator that the other had provided relevant information to the CG. These two calls were made independently and almost simultaneously and each of them dealt directly with the specific asks of the CG handler to whom they were speaking.
3.13	No comment
3.14	AML in this context in fact stands for Advanced Mobile Location. ECAS does not have sufficient information or expertise to agree or disagree with the comment that the phone mast area did not provide a clear start point to initiate a search and that the SAR units would not know what type of casualties they were searching for. However, ECAS would note as previously stated that it provided the best possible location information to the Coast Guard, and specified (in the call from ECAS Ballyshannon Lead Operator to the CG) that the caller had requested the Coast Guard in relation to an incident "off Malin Head".
3.15	No comment
3.16	ECAS can confirm that the call at 15.30 relating to the incident was received by ECAS. The call was handled by routing to CG after a clear request by the caller. Once connected, the CG established location directly with the caller.
3.17	No comment
3.18	No comment
3.19	No comment
3.20	No comment
3.21	No comment
3.22	No comment
3.23	No comment
3.24	No comment
3.25	ECAS call handling procedures direct that the operator should only offer replay of the beginning of call <u>once the caller has left the active call (i.e. after the caller has cleared)</u> . This is intended to avoid additional confusion while the caller is still on the line. At the time the CG ended the call, the ECAS Operator's workstation would have shown the caller as still connected as ECAS had not received the call end signal from the caller's end at that point. The inbound call ended almost at the same time the CG ended the call. The operator ended the call one second later (and immediately flagged her concerns with the lead operator). Therefore, with CG leaving the call, the ECAS operator did not have the opportunity to offer replay of the beginning of the call.

MCIB RESPONSE: Noted.

Correspondence 8.3 BT ECAS and MCIB response

	<p>With regard to the statement that <i>“actual call playback of a terminated call to the emergency service by Lead operator at ECAS, though available on the ECAS system, was not enabled”</i>, please note that the call playback option to the emergency service was not a function of the ECAS system at the time of this incident and therefore was not available or could not be enabled. The functionality was subsequently developed for the system and launched in December 2018.</p> <p>With regard to the statement that <i>“the content of an emergency call, if listened to by an ECAS Lead operator, could have been relayed to the Coast Guard verbally”</i>, ECAS reiterates again that both Navan and Ballyshannon lead operators did listen to the call and did convey the information they were asked for to the Coast Guard. The Coast Guard did not ask for any information that was not provided and the ECAS lead operators were satisfied that they had conveyed the call and all relevant information to the CG to allow it to determine a course of action.</p> <p>Transcripts of both Navan lead operator and Ballyshannon lead operator calls are available from the CG recordings and BT would strongly contend that these transcripts are required in full in the report for the purposes of natural justice and to provide full understanding and context.</p>
3.26	<p>BT ECAS disagrees with the statement in the Draft Report that <i>“..the ECAS operator handing the emergency call monitored it throughout and was aware relevant information regarding the incident had not been passed on to the Coast Guard when the initial emergency call was terminated by the Coast Guard”</i></p> <p>The ECAS operator had a general concern with how the call had progressed and its abrupt ending and for that reason requested the lead operator to check with the CG to confirm that they had all of the information they required, but the ECAS operator had not formed the view that she had further relevant information that had not been passed on to the CG. This is evident from her Garda statement.</p> <p>ECAS has not seen any information to support the statement in the Draft Report that <i>“the ECAS Lead operator at Navan was advised by the operator who took the emergency call that relevant information regarding the location and severity of the incident was not passed on by the caller to the Coast Guard”</i>. In fact, the statement of the ECAS operator indicates that her aim was to ensure that the CG had all required information (to the extent it was available to ECAS) given the abruptness with which the call ended. She was not of the view that there was available information that had not been passed on to CG.</p>

MCIB RESPONSE: Noted.

Correspondence 8.3 BT ECAS and MCIB response

	<p>As stated previously, the simultaneous contact between different personnel was as a result of the ECAS hotline not being used to contact the lead operator centre (ref response to 3.5)</p> <p>As stated previously, ECAS has not seen any evidence of an assumption made by either ECAS lead operator that the other had provided relevant information to the CG (ref response to 3.12)</p> <p>As stated previously, no requests were made by either ECAS or CG in relation to call playback as this functionality was not available once the initial call terminated (ref response to 3.25). ECAS lead operators listened to the call recording and provided information required by the CG.</p>
3.27	No comment
3.28	This function was developed (rather than enabled) subsequent to this incident. It had not previously been part of the functionality of the system.
3.29	No comment
4 (Analysis)	
4.1	No comment
4.2	No comment
4.3	No comment
4.4	No comment
4.5	No comment
4.6	AML is automatically enabled by Google and Apple on most Android and IOS mobile devices connected to an ROI network for customers/subscribers of ROI mobile service providers for the purpose of providing enhanced caller location to ECAS. This is true for subscribers to all ROI mobile service providers and not just the three specifically identified in section 4.6 of the report. It is correct that AML for ECAS is not enabled in the Republic of Ireland on devices used by subscribers to non-ROI mobile service providers (i.e. inbound roaming users).
4.7	No comment
4.8	No comment
4.9	No comment
4.10	No comment
4.11	No comment
4.12	No comment
4.13	<p>The operator was of the view that this was a genuine distress which is evidenced by her immediately escalating with the lead operator and requiring her to ensure that the Coast Guard had the correct phone number.</p> <p>The ECAS operator was not permitted to offer the call playback facility until after the caller had cleared. In this instance, the Coast Guard ended the call at the same time as the caller signal dropped and the ECAS operator did not have an opportunity to offer call playback.</p>
4.14	BT cannot comment on whether or not the CG would have acted differently (or what the consequences of that would have been which

MCIB RESPONSE: Noted.

Correspondence 8.3 BT ECAS and MCIB response

	<p>appears to be speculative in the Draft Report), if the words “boat sinking” had been specifically conveyed to the CG. “Off Malin Head” was conveyed to the Coast Guard by the ECAS Ballyshannon lead operator in response to a request for location information.</p> <p>ECAS operates in a highly procedural environment given its role in the filtering and directing of calls. ECAS operators are trained to respond to calls in a very specific way that is designed to be supportive to the emergency service and to respond to specific asks. General details of call recordings are not proactively offered unless requested by the emergency service.</p> <p>Each of the ECAS operators involved were aware of the genuineness and seriousness of the call as is apparent from their actions, and none had reason to believe that this had not been adequately conveyed to the CG.</p>
4.15	<p>ECAS does not agree with the statement that it was a failure by ECAS staff to comply with operational procedures. In fact, ECAS is satisfied that all procedures were followed by ECAS personnel as should be apparent from our observations.</p>
4.16	<p>The ECAS operator monitored the call as per operational procedures. In practice, operators monitor on mute in order to reduce the risk of background noise interfering with the transfer of information on the call. The CG ended the call four seconds after hailing the operator.</p> <p>The call playback facility should only be offered by the operator once the caller has cleared under ECAS procedures – in this instance the CG had ended the call at the same time the caller signal dropped.</p>
4.17	<p>It is not stated procedure for lead operators to listen to the call recordings in the circumstances which occurred. Nonetheless both lead operators did listen to the call recording and provided the information requested by the CG. As such, this section of the Draft Report is incorrect.</p> <p>It was not possible for either of the lead operators to offer to play the call recording to CG as this functionality was not part of the ECAS systems at the time.</p>
4.18	<p>The name of the answering ECAS centre has never been visible to emergency services (and therefore there was no change in procedure following the Tit Bonhomme incident). This is because calls go to the next available operator regardless of which centre they are situated in. Emergency services have a hotline number they can call which routes them to the relevant lead centre if they have queries. The hotline number was not utilised in this case.</p> <p>As stated previously, the simultaneous contact between different personnel was as a result of the ECAS hotline not being used to contact the lead operator centre (ref response to 3.5)</p>

MCIB RESPONSE: Noted.

Correspondence 8.3 BT ECAS and MCIB response

	As stated previously, ECAS has not seen any evidence of an assumption made by either ECAS lead operator that the other had provided relevant information to the CG (ref response to 3.12)
4.19	No comment
4.19 (sic)	No comment
5 – Conclusions	<p>In relation to Conclusions 5.4 and 5.5 BT ECAS has a number of comments to make:</p> <ul style="list-style-type: none"> - The statement that the information CG had regarding the incident was incomplete implies that ECAS did not pass all information to it. ECAS routed the call to the correct emergency service and confirmed that the location was in Co Donegal, which is in accordance with stated procedures. - BT ECAS does not have sufficient information to comment on what CG requires to initiate a SAR process, and ECAS operators would not be familiar with this process - In respect of 5.5(i) – BT ECAS is satisfied that the ECAS operator and lead operators did in fact all comply with ECAS procedures, in the way that the initial call was handled and in how each of the lead operators interacted with the CG. All operators listened to the call and conveyed as much location information as was available. - In respect of 5.5(ii) – BT ECAS submits that this conclusion is factually incorrect. The lead operators both listened to the call recording and answered CG’s questions. Neither were in a position to offer call playback to the emergency services as this function was not part of the ECAS system at the time - In respect of 5.5(iii) – BT ECAS submits that this conclusion is unfounded. ECAS has not seen any evidence of an assumption made by either ECAS lead operator that the other had provided relevant information to the CG (ref response to 3.12). Each lead operator was satisfied that they have conveyed all of the information requested by the CG. <p>In respect of conclusion 5.6, BT ECAS submits that it is an unfair and disproportionate conclusion of the MCIB that the casualties were in the water for 5 hours because information in the initial call recording was not transferred. As mentioned, BT ECAS does not have sufficient information to understand what circumstances would have triggered a SAR process, and has no answer as to why a SAR process was not commenced. However all of the ECAS operators involved were</p>

MCIB RESPONSE: Noted.

Correspondence 8.3 BT ECAS and MCIB response

	<p>satisfied that they had assisted the CG to the best of their knowledge and provided all of the location information that they were requested to provide.</p> <p>In respect of conclusion 5.7, and with reference to our comments at the outset of these observations, ECAS was established to be the first line for emergency calls with the purpose of filtering genuine calls and making sure they are routed to the relevant emergency service in the fastest possible time. Location information is automatically conveyed via the system.</p>
6 – Recommendations	No comment
7 - Appendices	No comment (except for redaction of the Hotline number in the Coast Guard procedures)

MCIB RESPONSE: Noted.

Correspondence 8.3 BT ECAS and MCIB response

Annex 2

Extract from Emergency Call Answering Service

Communications between Emergency Services and ECAS

ECAS/SUP/ S047

Active Call Query – Communications Model

Communications Model

The following simple communication model will be used for Active Call Query

- Contact
- Verification
- Information Exchange
- Replay & Confirm
- Communicate within ECAS
- Log

Contact

Emergency Service will ring Lead Centre on telephone number XXXXXX

Verification

The above telephone numbers will only be issued to Emergency Services and therefore knowledge of these numbers will verify the caller as a legitimate Emergency Service. The telephone number will be answered by an ECAS Manager.

Information exchange

Emergency Service will explain situation and ask for details about a specific call detailing the CLI and approximate time of call.

The ECAS Manager will locate the details of the call from the ECAS Management Information System and pass these verbally to the Emergency Service.

Replay & Confirm

Correspondence 8.3 BT ECAS and MCIB response

ECAS Manager will confirm with the Emergency Service that all the requested information about the call has been passed to and understood by the Emergency Service.

Log

ECAS Manager will log the Emergency Service request.

Correspondence 8.4 Irish Coast Guard and MCIB response

An Roinn Iompair
Turasóireachta agus Spóirt
Department of Transport,
Tourism and Sport



10th
14th April 2020

Ref; MCIB/12/280

██████████
Chairperson MCIB.

Dear ██████████

2nd Circulation of Draft Report Fatal incident Portronan, Co Donegal July 2018

1. Your letter of 13th March and March 2020 Draft report (2nd circulation) refer.
2. Coast Guard has NO observations on the factual content of the report.
3. Coast Guard acknowledges that it was in receipt of the circular that was sent to the Emergency Services (S4.28) with details of the ECAS emergency number on 13th September 2017. This circular stated that *'the old contact numbers will remain operational but will only be used as a back-up for the new phone system'*. It was in this context that the number remained in circulation and was used by the IRCG operator (Watch Officer) to contact ECAS (Ballyshannon) on the date in question; as opposed to the prescribed primary number.
4. The report (at 4.36) documents that the IRCG operator (Watch Officer) who received the initial call, *"was on the line for a total of 41 seconds i.e. 37 seconds hailing the caller and a further 4 seconds endeavouring to speak to the ECAS operator. No conversation whatsoever took place during this period. The IRCG operator made subsequent efforts to call the number back and placed a follow up call with ECAS, and the ECAS centre in Navan made contact with MRSC Malin"*.
 - a. This section (4.36) also states that; *"With regard to the IRCG Aide Memoire in place at the time of the accident, the IRCG operator who received the initial call followed the instruction"*.
 - b. At S3.49 the report states that; *"it appears that the call was ended by the IRCG because they had heard nothing from the caller and there was no response from the ECAS operator when called out to. It is not clear what other option the IRCG operator had other than to hang up and call back, which is what happened...."*

MCIB RESPONSE: Noted.

MCIB RESPONSE: Noted, Para. 4.49 of the report has been amended to include text from Circular S4.28.

MCIB RESPONSE: Noted. Para. 4.36 is 4.73 in the published Report.

MCIB RESPONSE: Noted.

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Correspondence 8.4 Irish Coast Guard and MCIB response

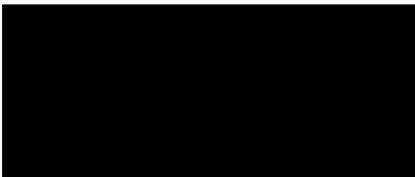
- c. The report records that the IRCG operator (Watch Officer) made several subsequent efforts to call the number back and also placed a follow up call with ECAS. It also notes (S4.38) that *"In this case the only information was a mast on Malin Head with a 20Km radius and no information as to casualty type"*.
 - d. The IRCG operator (Watch Officer) was not furnished with any information that might have otherwise aroused his/her suspicions and discharged responsibilities as prescribed in the IRCG aide memoire i.e.) *to obtain adequate address and call-back details and incident location information from the caller and / or the operator, to ensure that the incident being reported can be located;"*.
 - e. In this context it is requested that the finding at 5.5(1) be reconsidered, lest it attribute unreasonable blame on the IRCG operator in light of the significant efforts that were made to obtain additional information and to comply with the procedure set down in the Aide Memoire.
5. In relation to recommendation at Section 6, we would request the Board to consider including an additional reference on the benefits of using PLBs and EPIRBs, as an emergency alerting system i.e. augmenting the reference to marine VHF radio and to reiterate the advice provided in Marine Notice 40/2019 in relation to the risks associated with reliance on mobile phones as seagoing emergency safety communications devices.

MCIB RESPONSE: Noted.

MCIB RESPONSE: Noted.
The Report has been amended.

MCIB RESPONSE: Noted.

Yours sincerely,



Irish Coast Guard
Department of Transport, Tourism and Sport

10th April 2020

Correspondence 8.5 Department of Communications, Climate Action and Environment and MCIB resposns

Roinn Cumarsáide, Gníomhaidhe
ar son na hAeráide & Comhshaoil
Department of Communications,
Climate Action & Environment



14 April 2020

██████████
Chairperson
Marine Casualty Investigation Board
Leeson Lane
Dublin 2
D02 TR60

**Re: Draft Confidential Report into a Fatal incident off Portronan Pier, Co Donegal.
17 July 2018 (2nd circulation under the Natural Justice Process)**

Dear ██████████

I am directed by the Minister to refer to your letter and draft report of 10 March last in the above regard. I would like to thank the Marine Casualty Investigation Board (MCIB) for the opportunity to respond afforded to the Department, and to re-affirm the Department's ongoing support to the MCIB's investigation into the incident.

At the outset the Department wishes to again acknowledge the tragic nature of the events set out in the draft report and to convey condolences to all affected by the incident.

The Department understands that BT Communications Ireland Ltd (BT), the operator of the Emergency Call Answering Service (the ECAS), has made its own submission in response to the draft report.

The Department's response is focussed solely on the report as it pertains to the Minister's role with respect to the ECAS. As previously conveyed to the MCIB, the Minister's statutory role regarding the ECAS is set out in the Communications Regulation Act 2002 (as amended) which enables the Minister to enter a contract with a person to provide an emergency call answering service.

Enhancements to the ECAS

The Department welcomes that the draft report notes and acknowledges that the ECAS has been enhanced since the incident; in particular the introduction of the facility for the ECAS lead operator to offer playback of recordings to an Emergency Service over the Hotline after an emergency call has ended.

The draft report is correct in noting that AML – an enhancement introduced in Ireland for the ECAS in 2017 - is not available for calls from handsets registered with foreign mobile phone

MCIB RESPONSE:
Noted.

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Correspondence 8.5 Department of Communications, Climate Action and Environment and MCIB respons



providers. As set out in the Department's letter of 24 September last, the ECAS is kept continually under review to ensure that it remains effective. In that regard, the MCIB may wish to note that the Department has initiated a project with all relevant stakeholders, including the ECAS, communications service providers, and the Commission for Communications Regulation to establish the technical steps required in order enable AML technology for foreign registered mobile phones and it is expected that this facility will become available later this year.

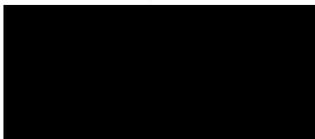
MCIB RESPONSE: Noted. The report has been amended (see 4.25 (viii)).

The Department has a number of specific observations on the draft report which are contained in the annex to this letter.

Finally, the Department notes the Report's draft recommendations. As previously stated in the Department's original submission of 24 September 2019, once the Report has been finalised, the Department will consider the Report's findings and will work with stakeholders including the Department of Transport, Tourism and Sport, the ECAS, the Irish Coast Guard and other emergency services to take all appropriate actions arising.

MCIB RESPONSE: Noted.

Yours sincerely,



National Digital Strategy and Telecommunications Market Contracts Division

Correspondence 8.5 Department of Communications, Climate Action and Environment and MCIB respons



Annex

Caller location and role of ECAS monitoring emergency services responses:

The draft report addresses the topic of caller location and cites the Department’s previous submission in concluding in paragraph 4.18 that one of the responsibilities of the ECAS is to establish caller location. This is correct to the extent that the ECAS establishes the location “for the purpose of being able to route a call to the appropriate emergency service centre”. It is not a requirement on the ECAS to establish caller location in place of the need of the individual emergency service establishing exact locations, such a requirement would naturally be inconsistent with the intention of routing calls without delay.

Therefore, the draft report is mistaken in its summation of the Department’s description of the objectives of the ECAS in tracing the location of a caller in paragraph 4.60. The Department has not described this requirement as one of establishing caller location simpliciter. As stated above, it is a requirement of the ECAS to establish caller location, or incident location, for the purpose of routing a call to an appropriate emergency service centre. Any additional location information, such as AML or mast information, is automatically forwarded to the ECAS by communications service providers and the ECAS systems passes this information automatically to the Emergency Services to support their role.

On a related matter the Department would wish to point out that in terms of transferring the call to an individual emergency service (paragraph 4.30) the role of the ECAS is to stay on the call until such time as the emergency service has commenced to discuss the nature of the incident with the caller. In this regard, the Department respectfully suggests that the report should not rely on SAR OP5/18 (which post dates this incident in any event) in drawing any conclusions as to the role of ECAS.

MCIB RESPONSE: Noted.

References to the status of an ECAS Hotline:

In terms of the Call Handling Procedures, the Department notes that paragraph 4.28 of the draft report acknowledges that a memorandum was circulated in September 2017 to all the Emergency Services detailing the number that the Emergency Services should use to contact the ECAS – this being the new Hotline number. The Department notes that the meeting of the Emergency Services Forum on 13 September 2017 concluded with an outcome that the said memorandum be circulated. The Department notes that all four of the emergency services were represented at the said meeting and were included in the circulation of the memorandum with the new Hotline Number. The Department respectfully suggests that paragraphs 4.33 and 4.60 be amended to reflect this position. The meeting and memorandum evidence the agreed outcome on the use of the Hotline.

MCIB RESPONSE: Noted.

Correspondence 8.6 BT ECAS and MCIB response



Strictly Private & Confidential

██████████
Secretary
Marine Casualty Investigation Board
Leeson Lane
Dublin
D02 TR60
██████████

Your Ref: MCIB/12/280
Date: 10th April 2020

Dear Madam

Draft Confidential Report into a Fatal incident off Portronan Pier, Co Donegal 17 July, 2018 ("the Draft Report") – observations from BT Communications Ireland Limited (BT), operator of the Emergency Call Answering Service (ECAS)

Thank you for providing us with the recent updated draft MCIB report. We are grateful for the opportunity to provide additional observations.

It will no doubt be appreciated that there are a number of points in the report that we do not agree with either in terms of the substance of the report or in terms of the phrasing of certain points. We recognise however that MCIB have a statutory function to fulfil and we do not wish to engage in protracted correspondence which may affect the timely fulfilment of that statutory function.

For present purposes therefore (and hopefully in ease of MCIB) we are restricting our comments to the conclusions expressed at 4.1(7) and 5.6 of the draft MCIB report. For ease of reference, those paragraphs read as follows:

4.1(7): Events post incident by ECAS operators and Coast Guard **which led to its severity**

5.6: **Because** the information in the recording of the emergency call was not transferred shortly after 10.16hrs the casualties were in the water for 5 hours. **This increased the severity of the incident.**

(emphasis added to assist consideration of the below submissions)

4.1(7)

In paragraph 4.1 there are a number of factors identified as relevant. Is it appropriate and proportionate to single out only one of those factors over the others as having "led to the severity" if the incident? Is it not the case that *any* of those factors, if they were different, could have altered or indeed obviated the severity of the incident, rather than just the one listed at sub paragraph (7)? In that context would it not be fairer for the report to reflect the combined effect of the factors?

On the subject of the "severity" of the incident, the draft report does not identify any evidence to support the conclusion that factor 4.1(7) alone "led to the severity" of the incident. There is no definition in the report of "severity" but it must be taken to include the fact that there were fatalities. There are numerous links in the chain of causation that would need to be addressed to express a conclusion on what led to the "severity" of the incident, for example:

MCIB RESPONSE: Noted.

MCIB RESPONSE: Noted.
The Report has been amended.

Correspondence 8.6 BT ECAS and MCIB response

1. If communications between ECAS and Coast Guard had been different, would that have led to the initiation of a Search and Rescue operation ("SAR") by the Coast Guard?
2. If SAR had been initiated, when would it have been initiated?
3. If SAR had been initiated, what form of response (helicopter/VHF broadcast to nearby vessels/life boat launch) would have been initiated?
4. What would the search area for such response have been? It should be noted that the location information available during the later SAR had the advantage of a precise location, fixed by reference to the vessel already providing assistance, and the shoreside caller. A search area earlier in the day would have only had the information "off Malin head" and the mast name. The phrase "off Malin Head" denotes an area of sea of approximately 330° around Malin Head.
5. Would the SAR have located the stricken vessel and casualties (depending on timing some or all of the casualties may have left the vessel, as they all did at various times), and if so, when? The answer to this question is closely linked to the nature of the response (point 3) and the size of the search area (point 4).
6. How long would the casualties have spent in the water by the time of rescue and would they have survived if rescued sooner?

Point 6 might, importantly, involve a consideration of expert medical evidence (in addition to consideration of the factual chronology, inasmuch as it relates to the fatalities) and MCIB do not refer in the draft report to medical evidence regarding time of death. It is to be noted however, that such evidence as is available, is summarised at paragraph 3.29 and does not seem to be consistent with the choice of words in paragraph 4.1(7).

5.6

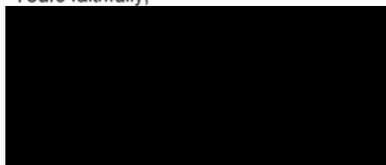
We note that 5.6 is drafted in less definitive, terms to 4.1(7) so to that extent appears more appropriate than 4.1(7). Many of the points set out under 4.1(7) still however apply to 5.6. If a view as to the severity of the incident requires to be expressed, the points above would need to be resolved.

SUBMISSION

It may be that MCIB do not consider it necessary or appropriate to seek to resolve the points set out under 4.1(7) above. Those points may indeed fall to be resolved in another forum in the future. If that is the position of MCIB, we would ask that consideration be given to choosing an alternative form of words to more appropriately reflect the purpose of the MCIB report and indeed the evidence obtained in the course of the investigation. If that is the course MCIB consider appropriate, then we would respectfully suggest that the appropriate phrase to use would relate to the time taken to effect a rescue rather than the "severity" of the incident. In that regard we would suggest that the evidence in the draft report suggests that all of the factors listed at 4.1 may have served in combination to increase the time taken to effect a rescue.

We hope the above is of assistance. Please do contact us if you require anything further.

Yours faithfully,



Emergency Call Answering Service

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MCIB RESPONSE: Noted.

MCIB RESPONSE: Noted.



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