

# **PCS response to the MCA consultation document, Protecting our seas and shores in the 21<sup>st</sup> Century (July 2011 proposals)**

## **1. Introduction**

1.1 The Public & Commercial Services Union represents 290,000 members in the Civil and public services, non departmental public bodies and some commercial areas. PCS is the biggest union in the Maritime & Coastguard Agency (MCA) with over 550 members. Many of these members are employed at Maritime Rescue Co-ordination Centres (MRCCs) along the UK coastline and are directly affected by proposals in the consultation document.

1.2 This is the second time PCS has submitted a consultation response to the UK Government on Coastguard reform. We welcome the abandonment of the original plans following a massive public outcry and scathing parliamentary criticism. However, whilst the revised plans are less destructive, they remain deeply flawed. This submission sets out our objections to the revised plan and our concerns about public safety should the proposed cuts programme be implemented

1.3 Despite seeking assurances during the first consultation process that revised proposals would be drawn up in full consultation with PCS, we are extremely disappointed that the second set of proposals published in July were tabled without any formal discussions with ourselves.

1.4 The Transport Select Committee was extremely critical of the MCA earlier in the year about the fact that operational officers were not consulted, and yet the MCA and government has now published revised proposals which still have not been the subject of discussion with our members. It seems incredible that an organisation that relies on the professionalism and skills of its front line staff has not consulted those staff on the future structure of the Coastguard before submitting a second set of proposals to Ministers.

1.5 In the absence of consultation from management, PCS has carried out its own consultation. We have just concluded a ballot of Coastguards on the revised plans.

We asked, “***Do you have any confidence that the proposals for the future of the coastguard service will protect the public’s safety?***”

86% of Coastguard members responded “NO”. This is a serious indictment of the revised MCA plans and a result that MCA management and the Government should consider most seriously.

1.6 We believe that the proposed closure of one station in each pairing as currently recommended, with a reduction in the staffing in the remaining station, would lead to serious operational difficulties making twenty four hour cover impossible. Moreover we will lose vital local knowledge in those areas where stations will close

1.7 The feedback to PCS from the general public and also the response at public consultation meetings has been one of complete opposition to the current MCA proposals.

1.8 The MCA has still failed to make its case for change. The proposals are at odds with announcements made by the European Commission on improved international collaboration and a possible single European coastguard service.

1.9 There has been cross party opposition to the MCA proposals. Our members continue to send in letters of support for the coastguard service from their MPs and MSPs. EDM 1256 which opposed the Government's plans to close coastguard stations has been signed by 113 MPs. The Governments of Scotland, Wales and Northern Ireland have publicly registered concerns.

1.10 We recommend that this second set of proposals is put on hold to allow for a genuine consultation exercise on the future of the Coastguard with staff. Nevertheless we do set out below comments to be considered which we hope can inform the need for a proper consultation exercise.

## **2. The proposals – our response**

2.1 PCS supports a national structure as opposed to the current paired structure.

2.2 We believe that there should be a national network of MRSCs (including London) across the UK which are all 24 hour operational and are linked together and into, a central Maritime Operation Centre (MOC). The MOC in this scenario would provide resilience should any MRSC go down or go offline

2.3 PCS acknowledges that the current structure of the Coastguard Service has come about, not by design, but by piecemeal evolution. The current 19 MRCC structure has developed over the years. Whilst it may not be the ideal design, we believe the service works well overall, despite being in need in need of technological advancement including the provision of a "Vessel Tracking System".

2.4 The current proposals however hold no credibility with staff delivering "Search and Rescue" (SAR). This is reflected in the fact that 86% of staff have said they have no confidence that the proposals will protect the public. The MCA has still not made its case for change.

2.5 PCS does not believe that the proposed structure will work. The establishment of one MOC with nine satellites will, we believe, result in too much pressure within the MOC and the MRSCs as the staffing levels in the MRSCs are inadequate to provide safe SAR in what will be a wider geographical area.

2.6 In the initial consultation we stated that our members, even those most likely to staff the MOC, believe that resources assigned to the proposed MOC will result in undue pressure. The establishment of a centralised operation will not address one of the key concerns PCS has over the loss of local knowledge.

### **Local knowledge**

2.7 Local knowledge is essential to the effective and rapid deployment of search and rescue around the coast. We have countless examples of where our members' local knowledge has been instrumental in ensuring no loss to life.

2.8 The MCA says they hope to replicate local knowledge through two means. Firstly, by using local Coastal Safety Officers (CSOs) and Coastguard Rescue Officers (CROs). However, this is impractical as contacting CSO and CROs may cause a delay in the deployment. Furthermore, if a MOC is receiving a 999 call and local knowledge of the area or dialect is relevant, then it is possible that considerable time may be lost by the deployment of resources in completely the wrong part of the country or a considerable time delay, which could result in the loss of life.

2.9 A second flawed assumption on the part of MCA management is that staff in MRCCs due to close, will move to the MOCs. This is at best a very brave and at worst, a foolish, assumption.

2.10 During the initial consultation exercise we spoke to all our members and it was clear that very few staff (less than 10%) would be willing to move to the MOCs. That position has not changed and bodes ill for the MOC being able to replicate local knowledge.

### **Technology - Radio communication**

2.11 Concerns expressed in our last submission have still not been addressed.

2.12 At present two stations cannot share the same aerial. This means that if an incident commences at one station it effectively takes that aerial out of use by any other station that may need it to communicate to persons in distress in their area.

2.13 Under the proposed consultation we understand it is intended to implement the new structure with existing technology via a software upgrade only. Within the current rolled out upgrade there are already numerous faults. We believe that any national structure must have a new system.

2.14 PCS believes it would be negligent to introduce a new structure into an emergency service, unless it is fully tested prior to implementation. Incorrect decisions could result in the loss of life. We believe that the proposals must be tested before any decision is made, otherwise the MCA will be culpable in the event of loss of life.

### **Location of the MOC**

2.15 PCS has already submitted our alternative proposals regarding how any MOC should function and be staffed. We have also stated our opposition to any station closures that result in compulsory redundancies or compulsory relocation. PCS still has grave concerns over the location of the MOC and we would also wish to re-emphasise our proposals regarding pay and reward that we submitted to the initial consultation particularly in relation to relocation.

2.16 Staff in MRCCs due to close, are being unrealistically expected to relocate to Southampton with higher costs of living. Southampton is one of the most expensive areas for residential homes out of the areas where we currently have Coastguard stations. Coastguard Officers are most likely to be the secondary wage earner within the household. Unless the primary wage earner is able to relocate to such an expensive area, they will not be able to follow. The age profile of many staff in itself will prohibit them from moving as they will not be able to get mortgages.

### **HR and linked remuneration issues**

2.17 In addition to concerns regarding the affordability of relocation we have ongoing concerns generally regarding remuneration and PCS has been in dispute with the employer for more than four years over levels of pay. It has been said to us that the current proposals would hopefully resolve that pay dispute. However, as there is no mention anywhere in the document of the pay levels assigned to the new jobs it seems unlikely that this will be achieved.

2.18 Our members employed in the MCA are some of the lowest paid within the Civil Service and are the lowest paid of the emergency services. Our members are underpaid and undervalued for the work they do. The effect of this undervaluing and underpayment of Coastguard Officers can be seen in Yarmouth where recruitment to Wind Farms, on better wages, has seen the Coastguard station at Yarmouth decimated in terms of staff there. As a result the MCA has to draft in other resources from other MRCCs

which potentially leave other stations short of staff. Many of our members have to take on additional jobs to supplement their income.

2.19 In a recent ballot of our members 99% supported a call for full and open consultation with PCS on the MCA's plans including pay rates. We have asked management repeatedly to table proposals, but to no avail. If management were serious about finally resolving the dispute why have they not, even if only on an "in confidence" and "without prejudice" basis, given PCS sight of any proposals. We have already submitted in our first response our proposals for a revised pay and reward structure. We would welcome discussions on progressing our proposals.

2.20 Any moves to modernise the Coastguard service need to finally address the inequalities and unfairness in our member's pay and this should be done as part and parcel of any re-structuring process.

### **Up skilling of staff**

2.21 PCS acknowledges that the Coastguard will need to have VTS in the future. This will require additional skills which should result in a revision to the current grading levels. No mention is made in the consultation document of how staff will be up-skilled or regarded. No mention has been made of what will happen to staff that are unable to undertake the new duties and what options will be available for them.

### **Compulsory Redundancies & Relocation**

2.22 We have repeatedly asked for a commitment to a no compulsory redundancy agreement. In a recent ballot 93% of Coastguard staff voted yes in support of a demand for a no compulsory redundancy agreement. PCS believes that the employer should give that commitment to staff.

### **Transition to new structure**

2.23 In the event that there are staff willing to move to the MOC we would expect every permanent member of staff currently within the MCA to have equality of opportunity to apply for and take up posts within the new structure irrespective of when their station is due to close.

2.24 We believe that the current closure programme of MRCCs is too rigid and flexibility would need to be shown in the timetable for closure to reflect local circumstances including age profiling and other factors.

2.25 In any event, we question how stations earmarked for closure can be closed until the MOC is up and running. For example it is proposed that Clyde be closed before the MOC is operational. In the event this were to happen, where would those staff go to?

2.26 Any migration to a new structure would need a revised relocation policy which would ensure that staff were in a position to move without financial detriment to new posts within the new structure. The current relocation policy does not allow for whole scale movement of staff especially to areas where housing prices are considerably higher than their current location.

### **Equality Impact Assessment**

2.27 No equality impact assessment has been carried out on the second set of proposals. This is completely unacceptable.

### **3. Conclusion**

3.1 There is public opposition and cross party parliamentary opposition to the current proposals. 86% of PCS coastguards balloted have no confidence in the proposals. There has been no proper consultation exercise with the staff by the employer. The only consultation has been carried out by PCS. The proposals are unworkable and will put people's lives at risk. We urge the MCA to put the proposals to one side and embark on a meaningful, genuine consultation exercise that takes account of what the public, the coastguards themselves and many elected representatives in Westminster and the devolved parliaments, would want to see from a modern coastguard service fit for purpose and the protection of lives.