

[REDACTED]  
[REDACTED]  
[REDACTED]  
[REDACTED]

Date:

[REDACTED]

14 September 2017



Alan Craze Solicitor (retired)  
HM Senior Coroner East Sussex  
31 Station Road  
Bexhill on Sea  
East Sussex TN40 1RG

[REDACTED]  
Chairman of the Council

Town Hall  
Bexhill-on-Sea  
East Sussex TN39 3JX

Dear Mr Craze

I am writing to you further to your letter of 24 July 2017 written under the powers vested in you as Senior Coroner for East Sussex relating to the prevention of future deaths and the matters of concern raised by yourself with respect to the tragic loss of life at Camber Sands in July and August 2016.

I understand the matters of concern you raise to be in summary:

- The opportunity for lessons learnt to be shared with others on a national basis
- A possible lack of formal risk management arrangements for UK beaches in the face of many changes: environmental, social and demographic
- Communications and educational issues
- The impact of resource availability on decision making for safety at the coast
- The possibility of restricting public use of UK beaches for safety reasons

I have also taken note of the helpful summary of risk management issues raised by Professor Ball and attached to your report.

You asked us to respond to your letter with details of action taken and proposed in response to your concerns.

Further to the relevant inquests held in 2016 and 2017, you have received from us two reports setting out the policy and operational arrangements in place in respect of our beach management functions at Camber Sands, a number of ancillary reports and documents as well as the statements of [REDACTED] and [REDACTED] presented to the inquest in June 2017. The documents in question are:

1. Rother District Council Report and appendices to HM Coroner East Sussex 17 October 2016
2. Rother District Council Second report and appendices to HM Senior Coroner March 2017
3. Witness Statement of Anthony Leonard 23 June 2017
4. Witness Statement of Robert Cass June 2017



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I will not repeat this information here but will update you on actions taken since the inquests.

You will already be aware that the Council took the decision to work with the RNLI for the provision of a seasonal lifeguarding service at Camber Sands from May 2017. Co-operation between the Council and RNLI has been very good and a successful service has been provided during the summer months. There have been a number of peak days at Camber Sands with capacity crowds. These busy days passed uneventfully with both the lifeguards and the Rother beach patrol dealing with lost children, first aid and advising and informing visitors. We have been working together to evolve and modify services and expect to make a number of small changes to the dates of service and deployment of lifeguards for next year.

We have incorporated the contribution of £50,900 (index-linked) to the RNLI into our annual budget setting process and remain under contract to the RNLI for lifeguard services until December 2019.

I note the RNLI have also been asked to respond to your report.

We have continued our policy of providing a seasonal beach patrol complementing the lifeguard service and comprising nine staff in support of the Coastal Officers at Camber Sands. We have used the learning from the incidents of 2016 to develop the staff training provided at the beginning of the season and the daily briefings. We have purchased two megaphones for the use of the beach patrol to assist in moving people from sandbars on an incoming tide as required.

Similarly we have maintained the effective joint working arrangement with Sussex Police known as Operation Radcott. As previously reported, this deals with missing/found children, vulnerable people and public order incidents. Sussex Police are currently investigating the use of drones for public safety purposes and we have given permission for them to fly them over RDC land. Our regular end of season debrief is scheduled for 9 October 2017.

The Deputy Coastal Officer is now a year round post in support of [REDACTED] and we expect the continuity and resilience offered by this appointment to strengthen the beach management function.

The RNLI provided us with a signage audit carried out to their internationally recognised standards, involving the updating of existing safety signs in line with the new lifeguard provision. These have been commissioned and will be installed shortly when conditions permit. In addition, we have purchased and installed two electronic dot matrix signs positioned at the main access points to the beach which have shown variable messages through the summer, with the option for messages in other languages.

A new leaflet setting out safety advice to visitors has been handed out to visitors at Camber. A copy is attached for information. A poster of this information is on display in the public conveniences at both car parks and is therefore seen by a large proportion of the visiting public. We are investigating the translation of this leaflet into relevant languages.



We have improved the management reporting of our beach operations by developing an online facility for staff to submit both weekly and incident reports within a template that meets reporting standards and which are then stored electronically for later retrieval as necessary.

With regard to your concern that information be shared with other relevant agencies, we are making a further presentation to the Local Government Association's Coastal Special Interest Group on 18 September 2017 in London when we will share our learning with other councils from around the UK coastline. We are of course willing to contribute to further awareness-raising and information-sharing initiatives.

It is our intention to review and revise as necessary the Camber Sands Community Risk Assessment and Safety Plan with the assistance of the agencies represented on the Camber Beach and Water Safety Group. These agencies include RNLI, National Water Safety Forum, MCA/HM Coastguard, East Sussex Fire and Rescue Service, Sussex Police, South East Coast Ambulance service, Camber Parish Council and the LGA, as well as a number of local businesses. We are assisting the formation of a Camber branch of the RNLI in order to raise funds for the lifeguard service and raise awareness of water safety.

Regarding the proposal for a more formal risk management process we feel quite strongly that a centralised or government-led approach to the issues of risk management around the extensive and varied coastline of the UK would be difficult to achieve. Our experience prompts us to agree with Professor Ball's finding that the task of risk assessment is "*best performed by those with intimate knowledge of the location*". Nonetheless, we would welcome any clarification that the Maritime and Coastguard Agency, especially HM Coastguard, is able to offer regarding support to local authorities in their role as beach operators.

We are in agreement with you that the best approach to improving water safety around the coast (and elsewhere) lies in a more co-ordinated and better resourced approach to raising levels of awareness and education both of the public at large and of those with a professional or public service delivery role. We believe this risk based, proportionate and evidence-based approach accords with that of the Health and Safety Executive with which we have recently been in consultation. As a small local authority with limited resources we are committed to nonetheless do all we can to assist this educational effort. The East Sussex Fire and Rescue Service under the leadership of Chief Fire Officer Dawn Whittaker have been a significant support to this work at Camber and across the county. Specifically the ESFRS have conducted a water safety campaign in local schools and provided a team of safety advisors at Camber on busy days.

Regarding the point about restricting access to part or all of certain beaches, we would advise that from our experience this would create a deal of public resistance were it to be introduced at Camber. There is an enormous amount of pleasure and wellbeing for people of all ages derived from year round access to the beach and sea in the Rother district. Taking this amenity away from the general public, even for short periods, may in our view be disproportionate, place new burdens on beach operators and in the end probably prove



unworkable. Regarding the question of proportionality, from [REDACTED] calculations of probability and risk we derive the finding that between the Council's formation in 1974 and 2012 there will have been a minimum of 38 million visitors, and potentially up to 50 million, to Camber Sands with no drownings.

We would of course implement a beach closure in exceptional circumstances to protect the public and when directed to do so for instance by the police. In addition we have used the 2012 byelaws to zone off the extreme sports area at Broomhill Sands for safety reasons.

As part of our corporate governance and the requirements for accountability and scrutiny, officers of the council have compiled a comprehensive report to our Audit and Standards Committee. The report will be in the public domain a week before the committee meets on 27 September 2017 when Members of the Council will be invited to debate its contents and propose any further actions they deem necessary to meet our obligations at Camber Sands. A draft copy of the report is attached for your information.

We would emphasise again that the tragic loss of life at Camber Sands on 24 July and 24 August 2016 is a matter of deep regret and we extend our sincerest sympathies to the bereaved families.

I hope that the foregoing meets your requirements. Please do not hesitate to get in touch with myself or officers of the council to discuss these points or request further information.

Yours sincerely

[REDACTED]

[REDACTED]  
Chairman  
Rother District Council

Enclosures: Camber safety leaflet  
Draft report to RDC Audit Committee 27 September 2017

