

Submission via email to info@jcra.je

Dear Sir/Madam,

Re: **Case T-116 Update to guidance on the provision of a public emergency call service**

Thank you for the opportunity to provide views on the above.

This response is provided by the 999 Liaison Committee (999LC) but in respect to answers to Questions 2, 3 and 4 does not reflect the views of JT (Jersey) Limited, which will be responding to the JCRA's consultation separately.

The 999 Liaison Committee (999LC), which brings together the communications service providers, the emergency services and the Government of Jersey to ensure the efficiency and effectiveness of the Public Emergency Call Service for the Island. The members of the Committee have considered the proposed changes to the JCRA Guidance and would like to make the following comments:

- We are pleased that the JCRA is reviewing its Guidance to both recognise the existence and clarify the relationship with the 999LC's Code of Practice on the Provision of the Public Emergency Call Service. The Committee is also grateful to the JCRA for its advice and support during the establishment of the group. In general, the Committee as a collective is supportive of this response but there are aspects that members will wish to respond to individually, this response should not therefore be seen as overriding any individual organisational response.
- **Q1: Do you agree with the proposed update in Section 1 to accommodate certain points contained in the agreement between parties responsible for providing the Island's emergency call handling service?** The 999LC is supportive of the changes overall as they explain the relationship to the Committee's Code of Practice. However, we would suggest that the role of the 999LC is referenced specifically, as well as the parties that make up the 999LC, and so suggest an amendment as follows; "The PECS Code of Practice is prepared and published by the 999 Liaison Committee (999LC). The 999LC is comprised of representatives of all parties to the provision of the public emergency call service (PECS). The Code of Practice details the method of handling calls between the Communication Service Providers (CSPs), the Public Safety Answering Point (PSAP) and the Emergency Response Organisations (EROs) in Jersey (Ambulance, Coastguard, Fire & Rescue and Police). Representatives from Jersey Government also play an important role within the Committee".
- **Q2: Do you have any comments on the proposed update to Section 2 to restate end-to-end obligations on providing a PECS following changes in the technical platform arrangements?** The 999LC recognises the need for clarity in relation to the obligations of each party involved in provision of the PECS. The members of the Committee, several of whom are licenced operators, fully understand the importance of maintaining emergency response through the Island's telecoms infrastructure and

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have established multiple layers of resilience to maintain communications and fulfil the obligations laid out in the Guidance and associated legislation. However, following discussion at the Committee the diagram at section 2.6 within the proposed guidance is causing particular concern for at least one of the communications service providers and the Committee feels that this review of this Guidance is an opportunity which should not be missed to ensure that obligations on each service provider are both clear and consistently applied.

- **Q3: Do you agree with the proposed update to Section 3 incorporating guidance on the use of automated answer/response systems?** The Committee agrees that the default for call handling should be a human and call handling resourcing in both the first stage PSAP and the emergency service control rooms is designed to provide this as much as possible, however there will be occasions where major events result in a need to utilise automated responses. The 999LC is comfortable with the wording proposed for Section 3.16 at this time but would highlight that new technology and increasing use of data to support emergency response may result in more automation in the future which the Guidance will need to allow for as suitable technology is developed.
- **Q4: Do you have any comments on the proposed update to Section to include a reference to the CHA/ES technology platform and clarify associated expectations on the LOs?** The description of the CHA/ES technology platform is simple and clear, the confirmation that there is an expectation that all the LO's have an obligation to assure themselves of the function and operation of the system is appropriate. However, we would suggest that there is also a moral obligation on the emergency services to seek the same assurances in relation to resilience, reliability and effectiveness of the 999 system as a whole, not just the call handling platform(s) and networks. This is an important part of the role of the 999LC.

Regards,

Darryl Keen

Chair – 999LC