

Report to	-	Audit and Standards Committee
Date	-	27 September 2017
Report of the	-	Executive Director of Business Operations
Subject	-	Beach Safety Management at Camber Sands

---

**Recommendation:** It be **RESOLVED:** That the report be noted.

---

**Service Manager: Brenda Mason**

---

## **Introduction**

1. Members will be aware of the tragic drowning of seven young men at Camber Sands in two incidents in July and August 2016. This loss of life in the sea off a beach under the operational management of the Council has impacted fundamentally on all those involved: the families and friends of the deceased; those witnessing the events; the community of Camber; the emergency services in attendance; our coastal team and other staff. Rother District Council's (RDC) thoughts remain with the families and friends of those who drowned.
2. This report is provided to Members of the Audit and Standards Committee within their remit for governance, risk management and internal control. It sets out an account of:
  - a. the management operation at Camber before and after the incidents;
  - b. the incidents and their aftermath; and
  - c. the risk management controls in place.
3. The purpose of the report is to provide accountability and assurance for Members.
4. The evidence for this report is drawn in large part from the evidence given by a variety of individuals and agencies, including RDC, under oath to Her Majesty's Senior Coroner for East Sussex, Alan Craze, at the inquests into the deaths held at Hastings on 1 November 2016 and between 26 and 30 June 2017. The proceedings of the inquests and findings are described in paragraphs 44 – 53 of this report.

## **Background**

5. Camber Sands is in the easternmost part of Rother district and as the only sandy beach in East Sussex is a major draw to visitors throughout the year, with as many as 25,000 visitors descending on the village of Camber on fine days during the summer season from Greater London and across the South East. It is estimated that Camber receives between 1.2 and 1.5 million visitors every year.

6. The Council holds a lease for Camber foreshore from the Crown Estates Commission and has managed the beach in line with its obligations since 1974. In addition, the Council owns and operates three car parks and associated facilities at Camber in order to manage the volumes of visitors and traffic congestion on Camber's busiest days. Keeping the beach and surrounding areas clean and well-maintained form part of the Council's duties as operator and leaseholder.

### **The Duties of a Beach Operator**

7. The Council has always taken its responsibilities as beach operator at Camber seriously, dedicating resources to the task of maintaining a well-ordered amenity. Responsibility for the safety of the visiting public and assistance in the event of an emergency has been at the heart of the Council's undertaking and its co-operation with the many other agencies and landowners involved. These include:
  - Maritime and Coastguard Agency
  - East Sussex Fire & Rescue Service
  - Sussex Police
  - Camber Parish Council
  - Royal National Lifeboat Institution (RNLI)
  - Environment Agency
  - East Sussex County Council
8. Under health and safety, occupier and public liability legislation, officers have managed identified risk since the Council took over the beach at its inception in 1974. Notwithstanding, given the nature of the beach and marine environment and the difficulty in identifying fixed boundaries, there is a certain degree of ambiguity surrounding issues of liability at the coast that is not present for instance in our management of other open spaces.
9. With regard to the Council's duties at Camber, James Maxwell Scott QC, the barrister appointed by our legal team to represent the Council at the inquest produced a Legal Note, attached at Appendix 1. The following is a notable extract:

*"At all material times, RDC was under no statutory duty to take any steps to prevent persons drowning in the sea at Camber Sands or to take any steps to rescue persons who were drowning or in difficulties".*

Further, Mr Maxwell Scott cites the case of Tomlinson v Congleton BC (2004) to show that this Council owed no relevant duty of care to visitors to the beach, quoting Lord Hoffman:

*"It will be extremely rare for an occupier of land to be under a duty to prevent people from taking risks which are inherent in the activities they freely choose to undertake upon the land. If people want to climb mountains, go hang gliding, or swim or dive in ponds or lakes, that is their affair."*

10. The Council used its powers to enact byelaws creating the Camber Seashore Byelaws in 2012. These byelaws control dangerous activity and public nuisance, attached at Appendix 2.

## **Beach Management**

11. The Council provides a Coastal team with a year-round presence to manage the beach, car parks and ancillary facilities. The full time, permanent Coastal Officer has a wide range of duties looking after the public on the beach and coastal areas. Among this range of duties, the Coastal Officer must ensure safety procedures, signs and notices are in place and carry out/arrange for repairs and maintenance of shore based lifesaving and first aid equipment and provide information and advice to members of the public, regarding tides, beach facilities, activities and safety restrictions. The Coastal Officer has a full time Deputy Coastal Officer and receives management support from the Neighbourhood Services Manager and the Service Manager - Community and Economy.
12. The Coastal Officer is responsible for a team of RDC staff and a number of contracted personnel during the peak season. The team comprises:
- 1 Coastal Officer (in post since 2004)
  - 1 Deputy Coastal Officer (previously seasonal, now a permanent position since March 2017)
  - 9 seasonal Beach Patrol
  - 5 seasonal car park attendants
  - RDC property maintenance team, attendance as required
13. In addition, the following are in attendance under the supervision of the Coastal Officer:
- Operation Radcott: 1 Police sergeant, 2 PCs
  - Cleaning contractor staff
  - Public toilet cleaning contractor staff

## **Beach Safety**

14. Prior to the events of 2016, Camber was known as a benign beach where the shallow waters and gently sloping beach provided a three mile expanse of sand for its many visitors to enjoy.
15. Safety on the beach is continually reviewed by the coastal team and departmental managers against the backdrop of the previous season's experience, reported incidents and available resources. Officer assessment of the beach environment then directs RDC investment into the provision of appropriate and reasonable control measures. Safety monitoring is carried out by the Coastal Officer and his staff at the beginning of each season and daily throughout the year. The Coastal team is very experienced and aware of the natural hazards. The use of inflatables, missing/lost children and first aid incidents formed a significant part of the risks staff were dealing with on a daily basis.
16. Staff had also become aware of the changing demographic profile of visitors in the past decade or so and had taken steps to promote the safety of those

from other cultures and non-English speakers. More detail on this is provided in the section on beach safety below.

17. During the summer period, the Coastal Officer employs a Beach Patrol on a seven day shift pattern. These officers work under the direction of the Coastal Officer to advise and guide beach users. All members of the Beach Patrol receive annual health and safety training with an Institution of Occupational Safety and Health (IOSH) qualified trainer. The primary duties of the beach patrol are:
  - Missing children search and safeguarding vulnerable people
  - Safety patrols and manning patrol stations
  - Public safety advice and guidance
  - First Aid, including CPR
  - Ushering visitors off sandbars on an incoming tide
  - Reporting criminal and anti-social behaviour
18. The beach patrol has access to a range of specialised equipment including two defibrillator units available at the Coastal Office and on board the RDC safety vehicle. The lookout situated on the first floor of the Marina Café has a good view of most of the beach for use in an incident. The Beach Patrol is responsible for issuing identification wristbands to families with children whilst offering safety advice and conducting search patterns under the guidance of the Coastal Officer for missing child scenarios.
19. The beach has an extensive system of safety and information signs to RNLI national standards at all primary beach entrances and access points. Life rings are located at strategic points. The alphabetised zoning system is used to direct emergency services to the correct location in the event of an incident. An electronic dot matrix sign (like those used on motorways) with the ability to show a short topical message has been purchased and used to convey information to the public at the main entrance to the village.
20. Off-shore winds during peak visitor season can give rise to problems with inflatables. Many users are not aware that inflatables can be difficult to control under windy conditions and they can be carried out to sea on an offshore wind. A system of safety warning flags using national conventions is in operation at Camber. Coastal staff are in direct communication with HM Coastguard and the inshore lifeboat facilities at Rye Harbour and Pett Level.
21. The Coastal Office provides a range of safety and information services and is staffed every day 08:00 to 17:00 from Easter to September. Outside the peak season the office operates at weekends and days where very good weather is forecast, in accordance with resources and demand.
22. The Coastal Office also accommodates a Police office which is attended at peak times under an agreement known as Operation Radcott. This is a joint venture with Sussex Police whereby the Council funds additional police presence during peak periods. This arrangement has proved successful in ensuring any incidents requiring police involvement are dealt with quickly and effectively, supporting the Coastal Officer where necessary and appropriate. It avoids unnecessary call-outs and associated costs for Sussex Police.

23. The Coastal Office accommodates a First Aid room, with trained personnel on-site during the season, a facility to receive and safely look after 'found' children. The office acts as a central location to post information on weather, tides and other safety matters

### **Risk assessment**

24. The Council's approach to managing risk is based on the principle that frontline staff and their managers are responsible for using their knowledge and experience in assessing hazards and mitigating their impact.
25. In 2004, RDC's Coastal Activities Project Board (a task and finish group), under the leadership of Councillor Robin Patten commissioned a management study of Camber from Atkins, an internationally respected consultancy. Atkins was guided in this work by Defra's report *Managing coastal activities: a guide for local authorities* (2004). The Atkins study was acknowledged as the first of its kind to involve participation from a wide range of users of the beach and public agencies including the Coastguard, Police, RNLI, recreational sports clubs and private businesses.
26. The resulting report provided the foundation for all the Council's later beach management activity at Camber. Atkins' approach to the study included:
- a site specific risk assessment performed by RNLI
  - a consideration of relevant byelaws performed by Fenner's Chambers;
  - a review of current stakeholder experiences and options for the future (through a participatory stakeholder workshop)
  - a Safer Sands Management Scheme framework
27. Following the involvement of the RNLI in the Atkins report in 2006, a good working relationship between RDC and the RNLI developed, with regular contact between officers of both organisations maintained over many years.
28. The Council has routinely conducted its own risk assessments at Camber Sands, noting the range of hazards that occur either naturally and through human behaviour. A range of mitigating actions has been put in place against known risks and pre-season and daily checks are maintained to ensure the measures remain in place.
29. In 2009, 2013 and again in August 2016 the RNLI undertook risk assessments of the locality based on their standard approach to assessing safety. These reports form part of the overall picture of safety management at Camber and are based on a visit to the beach and discussion with the coastal staff.
30. The RNLI Risk Assessments in 2009 and 2013 suggested a number of potential risk control measures, of which the following is an extract:
- *Review Public Rescue Equipment (PRE) to ensure it meets new national guidelines*
  - *Record incident statistics and visitor/activity numbers for future analysis*
  - *Ensure suite of standard and local operating procedures are in place for all activities performed or managed*

- *Provide beach safety information to targeted groups such as school groups and Tourist Information Centres*
- *Consider the option of on-going access to RNLI resources*
- *Consider the introduction of a seasonal lifeguard service.*
- *Use National Water Safety forms for recording of incidents and actions.*

*It is further recommended that the following additional reports are undertaken:*

- *Signage recommendations report*
  - *Public Rescue Equipment (PRE) recommendations report*
  - *Lifeguard service level assessment*
31. Consideration of the RNLI reports by the relevant officers concluded that the most important area to invest the Council's available resources was in the direct supervision provided by the beach patrol and provision of detailed signage and information to visitors. This position was informed by a long experience of the beach conditions and an understanding of the behaviour of the visiting public.
  32. Prior to 2016 there had been two tragic drownings at Camber, both similar in nature. In 2012 Tanzeela Ajmal, a non-swimmer who had entered the water fully clothed, lost her footing and although resuscitated unfortunately died later in hospital. In 2015 Thatchayiny Segar, also a non-swimmer entering the water clothed, was knocked down by a wave whilst paddling and efforts to resuscitate her were unsuccessful.
  33. The inquests recorded verdicts of misadventure and accident. At neither of these inquests was the suggestion made by the Coroner or other parties that the Council should have had a lifeguard service on duty. Emphasis was placed by the Coroners on the role of public education. The Council focussed on delivering the message about not entering the sea in inappropriate clothing and/or if unable to swim through the beach patrol and additional signage.

## **Events of summer 2016**

34. On 24 July 2016 in two simultaneous incidents at Camber, a young Brazilian visitor, Gustavo Silva da Cruz, drowned and a father and son were found unconscious on the shore. The father, Mohit Dupar, later died in hospital and his teenage son, Ankush Dupar, is now we understand recovered after a period of time in a coma.
35. The events of 24 July did not reflect the pattern of previous incidents and in response, the Council called an emergency meeting, which took place on 8 August 2016, of relevant agencies including the RNLI, Coastguard, Police and Ambulance Service to put in place any necessary response and identify any preventative action.
36. Due to the unprecedented nature of the July incidents and for public reassurance, RDC requested the RNLI to provide a temporary lifeguard service for the remainder of the season. The RNLI advised it was unable to commence a service as their resources were already fully committed for the 2016 season. They agreed to attend the beach on a busy day to assess

requirements for a possible service for 2017. Coincidentally, the RNLI was on the beach carrying out this assessment on 24 August when five fatalities occurred.

37. In light of the RNLI not having spare resource to provide a temporary lifeguard service at Camber for August, the agencies agreed the following actions at their meeting on 8 August:

- A large matrix sign was located at the entrance to the Western car park set to read “*SEA SAFETY CAN’T SWIM? DON’T GO IN!*” This sign would have been visible on entering Camber on 24 August 2016.
- Additional hand written chalkboards on the beach to convey local safety information.
- MCA to make available a number of throw lines and provide the associated training for the Beach Patrol’s use
- Beach Patrol will continue to engage with poor/non-swimmers to ensure sea safety is considered
- The RNLI to look at the wider issue of targeting safety messages at young adult males and IC4 (Asian) ethnic group
- RNLI to lead a programme to bring longer-term, generational change in attitude using websites, press, radio, social media
- RDC to task its Communications team to investigate how a sea safety message can be conveyed to target groups; to see how existing media channels can be best used and to liaise with the relevant government agencies and departments to drive a national response to the issue.
- South East Coast Ambulance service suggested ESCC mark box sections along road to allow safe and rapid response against on-coming traffic under peak flow conditions.

38. In a further incident at Camber in 2016, a party of young Sri Lankan men lost their lives to drowning on 24 August. Evidence as to the precise circumstances is scant, but it is believed that they may have been caught by the incoming tide whilst playing volleyball out on the furthest reaches of the low tide. The young men were identified as Kenugan Saththiyanathan, aged 18 years; Nitharsan Ravi, aged 22 years; Kobikanthan Saththiyanathan, aged 22 years; Inthushan Sriskantharasa, aged 23 years; Gurushanth Srithavarajah aged 27 years.

### **Actions taken following the incidents**

39. Following the incidents of 24 August, the Council requested RNLI to provide lifeguards at Camber for the Bank Holiday weekend and the remainder of the season. The RNLI were able to reallocate resources from elsewhere in the country and 6 lifeguards were stationed on the beach with responsibilities to supervise visitors in the water and at the tideline.
40. RDC officers sought urgent advice and guidance from the National Water Safety Forum, whose fire service representative is the Chief Fire Officer for East Sussex, Dawn Whittaker. In addition, the CEO of Durham County Council was contacted for advice on their recent campaign on water safety following a number of deaths by drowning of Durham University students.
41. Shortly after the incident, officers of the Council visited the RNLI HQ in Poole for a meeting with their senior team to discuss the way forward for Camber.

The role of both local and national campaigns in promoting beach and water safety was discussed. The proposal for a lifeguard service for 2017 at Camber was discussed and cost information subsequently received. The Council also requested a review of the Camber risk assessment from the RNLI to identify any new hazards contributing to the 2016 events. The Council put in place an action plan in response to the review and commissioned a lifeguard service from the RNLI for 2017. Whilst representing a significant additional cost from the Council's limited resources, the service provides additional public reassurance alongside the work of the Beach Patrol.

42. As part of the effort to inform and involve a wider group of agencies in a campaign for public education, Cllr Sally-Ann Hart, the RDC portfolio holder for Tourism, Culture and the Public Realm and Brenda Mason, Service Manager Community and Economy attended the LGA Coastal Special Interest Group meeting in London on 16 September 2016 and presented a paper. Coastal authorities were urged to submit their experience to the LGA for consideration of a high level policy review on beach and water safety. This information was collated with a view to learning from the experience of other authorities. It has become clear from this investigation that the level of investment by RDC in its coastal team is significant in comparison with a very mixed pattern of provision amongst the 68 coastal authorities. Most coastal safety initiatives would seem to be led by upper tier authorities rather than district councils. The LGA has also mounted a web-based awareness campaign for members.
43. The Council formed a Beach and Water Safety Group with a multi-agency membership aimed at learning the lessons from 2016, (Terms of Reference are attached at Appendix 3). The Group formed a Community Risk assessment and Safety Plan and has put in place all its recommendations. This group first met at Camber on 12 October 2016 and most recently on 16 June 2017. The strategic co-ordinator for the National Water Safety Forum, as well as a number of other highly placed professionals, has signalled his commitment to the aims and objectives of this Plan.

### **Inquest 2017**

44. The inquest into the deaths of the five men took place in Hastings from 26 to 30 June 2017 and was preceded by an adjourned inquest in November 2016 into the deaths of Silva da Cruz and Dupar as well as two pre-inquest reviews. The inquest of Silva da Cruz and Dupar was resumed at the June hearing. The families, the Council, the RNLI and the Maritime and Coastguard Agency were named as Interested Persons and were in attendance at the hearings. Our legal team comprised Julian Dexter from Keoghs, appointed and paid for by our insurer, Zurich. Julian Dexter selected James Maxwell Scott QC, an experienced barrister from Crown Office Chambers, to represent the Council at the inquest.
45. Evidence was heard from the families of the deceased, members of the public, medical practitioners and pathologists, the emergency response agencies, our Coastal Officer, two beach patrol staff and the Executive Director, the RNLI and a number of expert witnesses. In total 49 witnesses were called and/or their statements read. Rother District Council submitted an extensive array of information regarding the beach operation as well as



personal statements by Dr Leonard and Mr Cass, Coastal Officer, covering our operations and response to the incidents.

46. Most witnesses called were cross examined by each of the lawyers. Expert evidence was produced by the Council from the University of Plymouth who had been commissioned by RDC in December 2016 to undertake a Bathing Hazard Assessment. Further expert evidence was provided by Professor David Ball, from the University of Middlesex, on risk issues at Camber. Professor Simon Boxall from the University of Southampton provided a report on the physical topography and conditions at Camber Sands. Prof Ball's report is attached at Appendix 4 in full as giving an insightful account of the nature of the risk and the appropriate mitigation. The expert evidence emphasised how important it was that frontline staff are involved in assessing hazards and mitigating their impact. This has long been our approach to managing risk across the coastal operation.
47. The role of the inquest is to investigate and record the circumstances of the deaths. The Coroner recorded conclusions of misadventure for the seven deaths with the following narrative to explain the circumstances of the deaths of the Sri Lankan party:

*The deceased was one of a party of 5 Sri Lankan men who travelled to Camber to enjoy a day at the beach on 24<sup>th</sup> August 2016. They all went into the sea, at a time when the tide had started to come in. It is thought they were all on a sandbar when they were overtaken and cut off by the incoming tide. All five bodies were recovered to the shore deceased or found after the tide had receded. The RNLI has recommended deploying lifeguards at the beach in 2013 but this had not happened. Of course it is not known whether such a step would have prevented his death, but it has since been implemented.*

48. The decision in 2013 not to deploy lifeguards was taken by experienced officers with a full knowledge of the specific conditions at Camber, continuing a policy that had been established in 2006 and with the full knowledge of the RNLI and other agencies. The decision was founded on the safe record of the beach and an understanding of the nature of the identified risks, including the lessons learned from the previous fatal drowning in 2012 and the associated inquest (which took place in April 2013). The decision to deploy lifeguards from 2017 was taken in the face of unprecedented loss of life and with concern to reassure the visiting public. The expert witnesses at the inquest were concerned to convey that a lifeguard service at Camber could not be guaranteed to prevent future deaths.
49. Camber Sands was (and remains) a safe beach, and this is borne out by the incident statistics prior to 2016. Specifically, there had been no drownings and no reported incidents of bathers getting into difficulty in the sea (except in relation to the use of inflatables in offshore winds) since the Council assumed operational responsibility for the beach in 1974 until 2012. There had been no reported drownings since 1957 to our knowledge. There are an estimated 1-1.5million visitors to Camber Sands every year, and therefore between 1974 and 2012 there will have been a minimum of 38 million visitors, and potentially up to 50 million, with no drownings. Professor Ball has calculated that the risk of serious incident is very rare and has stressed that actions taken in mitigation need to be proportional to the size of the risk.

50. Following the inquest, the Coroner has written a Prevention of Future Deaths letter under powers given to him through the Coroners and Justice Act 2009 and regulations 28 and 29 of the Coroners (Investigations) Regulations 2013 to the following agencies asking for their response by the 18 September:
- i. The Secretary of State for Transport
  - ii. The Health and Safety Executive
  - iii. The Chairman of the National Water Safety Forum
  - iv. The Operations Director of the RNLI
  - v. Irena Dupar (widow of Mohit Dupar)
  - vi. Ankush Dupar
  - vii. Messrs Birnberg Pierce, Solicitors for the families
  - viii. Royal Society for the Prevention of Accidents
  - ix. Local Government Association
  - x. The Chairman, Rother District Council
  - xi. Maritime and Coastguard Agency
  - xii. East Sussex Divisional Commander, Sussex Police
51. Recipients of the letter are required to respond to the Coroner with details of the actions they intend to take to prevent future drownings. Rother District Council has previously submitted extensive documentation to the Coroner and has submitted a response to the Coroner's letter including an account of the action taken since the inquest and future plans. The Coroner's letter and our response are attached at Appendices 5 and 5a.
52. The Coroner took full note of the actions taken by the Council since the summer of 2016, in particular the commencement of the lifeguard service. In addition he commended a small number of further actions that the Council is implementing including the use of megaphones and foreign language signage. His recommendation for a watercraft stationed offshore is being investigated by the RNLI and the suggestion of surveillance drones is being looked at by the Police.
53. The Council's media team were active in responding to press and media enquiries following the incidents and around the inquest. National media took a keen interest in the story and, with the pace of events, inevitably some inaccuracies and imbalance crept into the reporting.

### **Camber beach management 2017**

54. Operations and procedures were extensively reviewed before the commencement of the 2017 season. After a period of mobilisation the RNLI lifeguard service commenced on the spring bank holiday weekend and quickly settled into a good working routine with the coastal team. There was much learning for the lifeguards during set up, assisted by our own staff.
55. The RNLI conducted a review of signage for the Council in April 2017 and the changes recommended were implemented in full. In addition the Council purchased two new static dot matrix signs that convey bespoke safety messages to visitors at the access points to the beach from the main car parks. These carry information in other languages as required.
56. Staff have enhanced the weekly and incident recording process, in co-operation with the RNLI. This will be used in the routine end of season review. We have similarly refreshed the protocols and procedures for risk

assessment using software to store data and trigger reviews to the relevant staff. Throughout the period since the incidents we have been concerned to look after the welfare of the staff involved, offering debriefs and support services to those affected.

## **Future Plans**

57. It is our intention to continue with a streamlined Beach and Water Safety Group to maintain the multi-agency approach to identifying risk and dealing with the changing nature of the operation at Camber Sands. We are contracted with the RNLI lifeguard service for an initial period of three years with regular review and adaptation of the service as required. We are continuing with the very valuable role of the beach patrol, over and above the service provided by the RNLI lifeguards, in engaging with the public and offering advice, guidance and assistance as necessary.
58. The invaluable work of the coastal team, particularly that of Mr Cass as Camber's Coastal Officer is continuing, and Members are requested to show their support for the dedicated and loyal service shown by this officer and his staff.
59. We will play a part in the promotion of water safety education alongside the work of the LGA, the National Water Safety Forum, the RNLI and East Sussex Fire and Rescue Service. The Fire Service has initiated a programme of visits to local schools to ensure that children have an understanding of the risks associated with sea bathing. Dawn Whittaker, the Chief Fire Officer for East Sussex, has been a valuable support to the Council in the year since the incidents. The RNLI has been working to make young men aware of the risks of drowning with a hard hitting media campaign, Respect the Water [www.respectthewater.com](http://www.respectthewater.com).
60. Civil claims have very recently been intimated on behalf of the families of the five victims of the August 2016 incident and Silva Da Cruz (but not Dupar). Our insurance company, the legal team and staff are considering these claims, and Members will be kept informed of any liability arising. As noted previously, our barrister James Maxwell Scott, QC has written a robust Legal Note concerning the Council's liabilities, identifying that there are no statutory requirements to provide a lifeguard service at beaches operated by local authorities, and therefore it is anticipated that the civil claims will be robustly defended.
61. The future of tourism at Camber is a topic worthy of consideration. The sheer volume of visitors is arguably unsustainable, with levels of traffic congestion that make residents lives very difficult at peak times. We have recently commissioned a study into how this level of car-borne visitors might be best managed and would hope for the co-operation of the highways authority and police in containing the worst of the impacts. Visitor management is a subject for the involvement of many agencies, public and private and invites a degree of community leadership from this Council.

## **Conclusion**

62. The events of the summer of 2016 at Camber Sands were unpredictable and unprecedented. We remain deeply aware of the impact of the drownings on

the families of the deceased and our thoughts and condolences have been offered to them.

Dr Anthony Leonard  
Executive Director of Business Operations

### **Risk Assessment Statement**

There are operational, health and safety and reputational risks associated with the beach management operation at Camber Sands. This report sets out the control environment for the management of these risks and invites scrutiny of the controls in place.

### **Appendices:**

1. J Maxwell Scott QC Legal Note
2. Camber Byelaws
3. Camber Beach and Water Safety Group Terms of Reference
4. Prof David Ball report to the Coroner
5. HM Coroner's PFD letter and RDC response