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Mr Ben King,
Head Eircode Division,
Dept. of Communications,

12th Jan 2021

Mr King,

EIRCODE MIS-ROUTING - REQUIREMENT FOR WARNINGS ON EIRCODE AMBULANCE ADVERT

My letter of 15th October 2019 to former Minister Bruton refers. (**copy attached as Annex A**) This letter specifically warned your Department of Eircode mis-routing and the associated dangers in relation to ambulances being delayed getting to their patients.

No action was taken by the Minister or by his Officials as a result and, since then, there have been multiple reports of ambulances being mis-routed using Eircode.

From the Eircode website dated 4th Jan 2021, there is an indication that the advert is again being run on RTE and I have separately seen it on social media. The advert contains no warnings for the public to check their code in case it is wrong or causes mis-routing. Furthermore, it states that using an Eircode "**May Help**" the ambulance service but it fails to state that it **may also make things worse than if just an address was used**, as demonstrated in the article dated 7th January 2021 on the "NewsBlog" at the www.checkyourcode.ie website. Articles at that NewsBlog also show many examples of Eircode mis-routing as reported by members of the Public.

I have been advised by RTE that it is the Eircode Division in the Department of Communications that has approved the advert and allows it be broadcast as a Public Service Announcement (PSA). As you are the head of that Division, this is, therefore, done under your authority.

This being the case and since:

- a. your Department was formally made aware of this issue and did not dispute that it exists in its response

- b. one of the Department's Eircode contractors has admitted publicly that Eircode mis-routing does occur
- c. there are multiple examples of ambulances & CFR personnel being mis-routed by Eircode in the public domain (***examples attached in Annex B***)
- d. I warned about this issue in evidence to an Oireachtas Committee in 2015 and many times publicly since (As you will be aware, I am a professionally recognised expert in the disciplines of Navigation & Positioning, with nearly 2 decades direct experience in the specific area of electronic road navigation)
- e. this issue can be technically explained and predicted
- f. the fact that the issue could result in harm to patients of the National Ambulance Service awaiting emergency care (***as suggested in the tweet attached as Annex C***)
- g. there is a remedy already available in the public domain that the Public can apply easily themselves if informed about it (see www.checkyourcode.ie)

you could reasonably be accused of contributory negligence by a patient, or their representatives, if they came to harm as a result of a CFR or an ambulance being mis-routed and delayed if you had not taken reasonable steps to warn & inform the Public of the issue. Placing a warning on the Eircode ambulance advert would be creditable start.

Furthermore, since

- h. you personally have specific professional geospatial knowledge which gives you the foundation to understand & confirm the technical aspects of the mis-routing issue
- i. your geospatial know-how is confirmed by your Fellowships of the Society of Chartered Surveyors of Ireland & The Royal Institute of Chartered Surveyors which both expect high professional ethical standards of their members
- j. the above memberships & fellowships allow you recognise the professional knowledge, expertise and insights that I, also a Fellow of both organisations, as well as a Fellow of the Royal Institute of Navigation, bring to the understanding of the issue.
- k. it is already a matter of record in the Oireachtas that, in evidence to the Oireachtas Communications Committee in 2017 and 2018, you gave evidence on the subject of Eircode which was incorrect and you then chose not to correct this when given the opportunity to do so. Appropriate confirmations are contained in correspondence from the Committee Chairperson to myself.
- l. the Eircode ambulance advert is being approved for broadcast as a Public Service Announcement (PSA) under your authority, even though it was previously found misleading by the Advertising Standards Authority for Ireland (ASAI)

- m. the Eircode ambulance advert is being approved for broadcast as a Public Service Announcement (PSA) under your authority, even though there is a direct conflict of interest as your responsibilities include: "*Overseeing the Eircode Division, including working with the Eircode Management Licence Holder to increase usage across the public and private sectors in accordance with the Departments strategy*" (as stated on your Department's website) and the increased usage referred to will benefit both the commercial license holder, Capita PLC, and your Department through increased revenue for both. Exposure & market penetration through the free broadcast of the Eircode ambulance advert can help to achieve this. Therefore, there is no independent oversight applied in having the advert approved as a PSA; - as would normally and reasonably be expected in such matters.
- n. previous correspondence referenced in Annex A has highlighted to your Department that the Eircode ambulance advert is not a genuine PSA and is anti-competitive

these issues would not stand well in your favour if you had to defend yourself against allegations of contributory negligence or similar.

I, therefore, strongly urge that you would immediately apply appropriate warnings and related information to the advert and, as requested in my letter attached as Annex A, commence cooperation with my organisation as soon as possible in the best interests of Public Safety.

Yours Sincerely

Gary Delaney
MSc (NT), FRIN, FSCSI, FRICS, Lt NS (Ret'd)
CEO



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Minister Richard Bruton TD,
DCCAE,
Adelaide Road,
Dublin

15th Oct 2019

Minister,

FAILURE TO ADVISE PUBLIC OF POTENTIAL FOR ERRORS IN EIRCODE “PUBLIC SERVICE ANNOUNCEMENT” COULD RISK LIVES

My correspondence of 12th Feb 2018, 13th Feb 2019 and your response of 19th July 2019 refer. These are all attached as Reference A.

In your response in Reference A, you argue that as Eircode is owned by the State, a related Public Service Announcement could not be commercial advertising. I believe this premise to be false and again direct you to the arguments in my previous correspondence.

As you know, Loc8 Code is supported by the National Ambulance Service (NAS) for places with no Eircode. This includes places where an Eircode is wrong or not functioning correctly. The HSE also uses Loc8 Code for major emergency planning for the same reasons. In the interest of Public safety, Loc8 Code continues to make its code available to State agencies for Public safety at no commercial cost.

For some time now, I have been highlighting how Eircode can misguide due to the failure in its design to recognise well known navigation/mapping requirements and to have the flexibility to deal with them. I have been highlighting these issues for several years and my concerns have been confirmed to me on numerous occasions by Community First Responder Groups and members of the Public.

It is for this reason that I have been writing to you and your predecessor to request cooperation in the interest of Public safety. In support of the Public’s use of Loc8 Code as a back-up to Eircode, we produced the Guide, attached as Reference B, several years ago and made you/your Department aware of it. However, to date your Department has failed to interact with Loc8 Code in any professional or meaningful way.

That failure has the potential to put lives at risk. See attached as Reference C a copy of a recent tweet from a member of the Public who’s Eircode recently misguided an ambulance. This

confirms again that which I have been warning against for years. If the Eircode “Public Safety Announcement” had advised people to check their code and that Loc8 Code could be used where there was a problem, then this lady would not have had the issue that she is now reporting. Failure to engage and cooperate as sought in my previous correspondence, could have resulted in harm. This is not an isolated issue; it has happened before and it could happen again and result in more serious outcomes on the next occasion. The lady in the tweet is now using a Loc8 Code when calling an ambulance to help resolve the issue. However, there are many more members of the Public that need to be made aware of this issue for their own benefit.

The same lady also reported the issue to Eircode (Capita) and they dismissed her by telling her to make contact with Google to resolve it.

- Firstly, the matter is not something for Google to resolve as Eircode & An Post are solely responsible for the location identified by their code and that location’s suitability for emergency response navigation as promoted in the “Public Service Announcement”. There is evidence in the Public domain that Eircode & its contractors are fully aware of the technical issue that caused this problem and know that Loc8 Code is the immediate & NAS recognised solution to it.
- Secondly, if Eircode (Capita) did produce a genuine “Public Service Announcement” for Eircode and ambulances aimed at enhancing Public Safety, then they would have acknowledged immediately their related Public Safety responsibilities and taken immediate direct action on behalf of the lady to resolve the issue there and then rather than directing her to a non-connected, commercial 3rd party. That 3rd party has made no Public Safety claims in relation to Eircode. As Eircode (Capita) had failed to deal with the issue, I made contact with the lady and explained how she could go about resolving her problem herself.

The above could be construed as evidence of wilful neglect on behalf of those claiming to create and broadcast “Public Service Announcements” to promote their product with the support of your Department.

Minister, given the record of my correspondence with you and your predecessor on this matter and, given the serious nature of the issues raised, it cannot be denied that cooperation is urgently required.

I, therefore, once again request an urgent meeting at your earliest possible convenience so that I can brief you in detail on all the matters raised above and set out the joint cooperation I believe necessary to assure public safety in relation to these matters.

Yours Sincerely,

Gary Delaney
MSc(Nav Tech), FRIN, FRICS, FSCSI, Lt NS (Ret'd)
CEO Loc8 Code Ltd

Annex B

CFR Ireland related Chat Group - Facebook
9th January 2021



Keith Burke

James Butler well, to be fair, loc8 is far superior and eircode is, at best, barely fit for purpose 😊 loc8 will get you to your destination everytime. Eircode cannot claim that. We operate in Naas urban. We have been mislead on directions more than a handful of times by eircode and we're not even operating that long. So, what are your products so I can stop using them? 😊

Like · Reply · 3 d



Dr. David King

@DavidKWfd



#Christmasmiracle (thread):
Sunday evening Adam was playing with his siblings and broke his left femur. A serious break, complete snap. We called an ambulance, Eircode took it to the WRONG place, got stuck up a lane past my house. Had to be pulled out of the mud by a tractor...

@GMapsPlatform please help. Your map location for my mother's house based on eircode is WRONG. Causes huge problems eg ambulance went to wrong place. How can I get you to fix it?

7:41 PM · Aug 20, 2019 · Twitter for iPhone

The building is correct but the acces is incorrect so people go to the wrong road.

5:00 PM · Aug 21, 2019 · Twitter for iPad



Shercock CFR

@ShercockCFR

Replies to @loc8ccde and @irishheart

Thanks, yes we did offer checks to see if it brings you to the door - and recently did obtain and leave a #loc8code with a family where #Eircode was not suitable for navigational purposes.

18:32 · 12 Oct 19 · Twitter for Android

21:28 · 24 Dec 19 · Twitter for Android

Our folks in North Louth recently called on the ambulance service and gave the eircode. However, the ambulance crew struggled to find the correct road and house, and passed by twice before being brought up assisted by the local postman! Not sure if crew or systems failure.

21:32 · 18 Feb 20 · Twitter for Android



Annex C

clairebear

@clairebear2838



Replying to [@loc8code](#) [@tazelhunney](#) and
[@Eircode](#)

Unfortunately this happened
to someone close to me in
October, Eircode sent the
ambulance to the direction & the
person passed away, paramedics
even said if the eircode directed
them right they would have
arrived sooner & there was a
huge possibility he would have
survived [#eircode](#)

9:38 · 12 Dec 20 · [Twitter Web App](#)