

Phoenix Register of Shipping (PHRS)



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Subject:	PHRS Guidelines on the Assessment of Safety Management System Implementation On-board Ships
Addressed to:	PHRS ISM/ISPS Auditors and MLC Inspectors

ISM Code, Section 2:

Safety & Environmental Protection Policy

The top management must produce a Safety and Environmental Protection policy, which must be well understood and supported ashore and onboard the ships by the crew, in order to provide strong motivation for the overall effective implementation of the company's SMS.

Verify that:

- The policy statement is signed off by the top management,
- The policy is properly controlled and the latest revision is in use,
- The policy posters are displayed at prominent locations ashore and onboard,
- Crew members are able to demonstrate a general awareness of the contents of the policy,
- Safety and environmental objectives and targets established in the SMS are consistent with those contained in the policy statement,
- Onboard procedures and practices support and contribute to the achievement of the objectives and targets established by the company

Company Responsibilities & Authority

The provision of support, allocation of resources and overall commitment of the company is vital for the effective implementation of the SMS on board the vessel.

Verify that:

- Responsibility, authority and lines of communication of key personnel involved with the SMS implementation are clearly defined and documented in the SMS,
- Crew is able to demonstrate an awareness of their duties and responsibilities under the SMS, and records of their familiarization with the duties/responsibilities exist,
- If the day-to-day operations of the vessel have been delegated by the ship-owner to a ship manager, evidence of this delegation by the ship-owner is available, including the reporting of the full name and details of a ship manager to the Administration, copy must be provided onboard,
- Requisitions for supply of stores and spares and requests for repairs are being followed up by the shore-based management without undue delay from the shore management,
- There is evidence of follow up action and monitoring by shore-based management over all outstanding non-conformities and deficiencies

ISM Code, Section 4:

The ISM Code places a special responsibility on the designated person ashore (DPA), as he/she the nominated person responsible for the implementation of the SMS ashore and aboard.

Verify that:

- Identification and contact details of the DPA have been reported to the flag Administration, if required,
- Posters with the identification and contact details of the DPA, are displayed at prominent locations onboard,
- Crew is aware of the identity and contact details of the DPA
- DPA has direct access to the top management,
- Qualification, experience and training of the DPA meet the IMO guidance contained in the Annex to MSC-MEPC.7/ Circ.6
- There is evidence that the DPA is engaged in monitoring the safety and pollution prevention aspects of vessel operations and ensure that adequate resources and shore based support are applied, as required

ISM Code, Section 5:

The Master has the responsibility to ensure that the requirements specified in the company's SMS are being observed.

Verify that:

- the Master is completely familiar with the SMS and is able to demonstrate his familiarity with his role and responsibility under the ISM Code,
- The SMS contains a clear statement giving the Master overriding authority to take decisions relating to safety and pollution prevention and to ask for assistance from the company when needed,
- Master is aware of and knows where this overriding authority is documented,
- Master's review of the SMS has been carried out as specified in the SMS and that it is effective,
- Master's standing and night orders are current and in accordance with SMS,
- Master is verifying that his crew is observing the procedures and processes specified in the company's SMS,
- He must be given the necessary shore-side support to execute his duties

ISM Code, Section 6:

The SMS must ensure that all personnel including the crew complement are competent, properly qualified, medically fit and given the proper training and familiarization to safely and efficiently perform their assigned responsibilities.

Verify that:

- The Crew on board meets or exceeds the minimum safe manning criteria established by the flag Administration. Verify the Crew List,
- Officers and ratings hold valid certificates and flag endorsements as per the International Convention on STCW,
- All crew hold valid medical fitness certificates,
- Master is fully conversant with the company's SMS and records of familiarization to support it are available,
- Safety induction, shipboard familiarization and safety training of crew have been carried out as per SMS,
- Crew is able to demonstrate their familiarity with the SMS commensurate to their role and responsibility,
- Shipboard officers are familiar with relevant Rules and regulations covered by the SMS
- Company (CSO) and ship security officers (SSO) are qualified and hold valid certificates as required by the Administration,
- Watch-keeping schedules have been established and a record of hours of rest is being maintained as per STCW 95,

The ship's personnel receive relevant information on the SMS in a working language or languages understood by them,

- Crew members are able to effectively communicate as a team in the execution of their duties,

ISM Code, Section 7:
Shipboard Operations

Documented procedures, plans, instructions and checklists for key shipboard operations concerning the safety of the personnel, ship and protection of the environment must be available and the various tasks should be defined and assigned to qualified personnel.

Verify that:

- SMS contains documented procedures for key shipboard operations relevant to the type of ship,
- Roles and responsibilities are clearly assigned to qualified personnel who are able to demonstrate their familiarity with assigned tasks,
- Voyage passage planning is carried out from berth to berth,
- Navigational charts and publications for the intended trade areas are available on board and have been updated to the latest notices to mariners,
- Ship stability and stress calculations for different stages of the voyage are being carried out,
- Bridge and engine room checklists (arrival, departure, testing controls, watch-keeping, etc.) are being followed,
- Permit to work system (hot work, entry into enclosed spaces, working aloft, lock out-tag out, etc) are implemented and conditions are being complied with,
- Suitable personnel protective equipment (PPE) is being used by the crew,
- Bunker and fuel transfer procedures are complied with,

- Ballast exchange plan is complied with as per regulations,
- Garbage management plan is properly implemented,
- A safe means of embarkation and disembarkation is available.

ISM Code, Section 8:

Emergency Preparedness

The company should identify all potential emergency situations that can affect its fleet, develop contingency plan to mitigate the adverse impact of these emergencies and periodically test the contingency plans to validate their effectiveness and to train and familiarize the crew.

Verify that:

- Muster lists are current and up-to-date,
- Contingency plans for potential emergency situations and program for drills and training are available,
- Personnel are familiar with their muster stations and assigned duties for each emergency situation,
- Drills as required by the company's SMS have been carried out as planned,
- Emergency exercises with shore-based emergency response team have been carried out as required by the SMS,
- Post-drill analysis and evaluation to identify weaknesses and lessons learned is carried out for continual improvement,
- Personnel are able to satisfactorily demonstrate emergency drills,
- Emergency contact information of shore-based emergency response team is updated and kept current,
- All safety equipment is readily available and adequately maintained,
- Fire control plans are up-to-date and current,

- Means of escape and access are unobstructed

ISM Code, Section 9:

Reports & Analyses of Nonconformities, Accidents & Hazardous Occurrences

Non-conformities, accidents, incidents and near misses must be reported and analyzed to determine the root cause. Appropriate timely corrective actions must be taken to prevent recurrence. Data collected is to be used for trending and continual improvement.

Verify that:

- Accidents, incidents, injuries and near misses are being recorded and investigated to determine the root cause,
- All accidents, incidents, injuries and near misses are being reported to the company,
- Timely corrective and preventive action is being taken and records maintained,
- Reported accidents and incidents are being closed out in a timely manner after verification of effectiveness of action taken,
- monitoring by the shore-based management of reported cases and actions taken is evident,
- Following a PSC detention, corrective action taken by the ship must not be limited to the PSC deficiencies. Action has been taken to identify and resolve other similar deficiencies existing on board.

Maintenance of Ship & Equipment

The Company should establish procedures to ensure that the ship is maintained in conformity with the provisions of the relevant rules and regulations (Class, Flag, National, etc) and with any additional requirements which may be established by the Company. This element deserves special and focused attention. A vast majority of detainable PSC ISM deficiencies relate to maintenance of ship and equipment.

Verify that:

- The ship has a planned and preventive maintenance system (PPMS) that is ship-specific and commensurate with the age of the vessel,
- PPMS is up-to-date with minimum overdue maintenance items
- Inspection of vessel is carried out as established in the SMS and identified defects are being dealt with
- All class, statutory surveys and servicing of all LSA/FFA/GMDSS items are being carried out within the appropriate periods and all certificates are up-to-date,
- Vessel is clean, tidy and well illuminated,
- There is no evidence of excessive corrosion and wastage on exposed decks and fittings,
- No unauthorized repairs, additions or alterations have been carried out

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- Any non-conformity, machinery / hull defects and breakdowns have been reported to the company with its possible cause, if known,
- Reported defects are being monitored by the company and appropriate /timely corrective action is taken to rectify them,
- There is no excessive accumulation of oil in the bilges
- Air pipes, sounding pipes, ventilators and closing appliances are properly maintained and serviceable
- Lifeboat/rescue boat lowering winch/davits were well maintained and in good operational condition
- Critical and standby equipment and systems have been identified in the SMS and routine testing is being carried out
- A sufficient stock of spares and stores is available on board as required by the SMS
- Records of maintenance and test activities are available

Documentation

All documentation relating to the SMS must be controlled and available at all relevant locations.

Verify that:

- All class, statutory and trading certificates relevant to the ship are available,
- The SMS manual issued by the Company is available to the appropriate holders/locations as prescribed in the SMS,
- Latest revisions of the SMS manuals, procedures and records are readily available at relevant locations,
- Latest editions of publications required by the Company and flag Administration are available,
- Copy of the ISM Document of Compliance with the latest endorsement is available,
- Deck, engine, radio and official log books are maintained and up-to-date,
- The correct format of the oil record book is in use on board and kept up-to-date

ISM Code, Section 12:

Company must ensure that the SMS is effectively implemented and fosters continual improvement through a system of internal audits and management reviews.

Verify that:

- Internal audits have been carried out at intervals not exceeding 12 months (in exceptional circumstances, this interval may be exceeded by not more than three months) by auditors who are independent of areas audited, as far as practicable,
- External audits (Recognized Organization) have been carried out as required by the ISM Code,
- Timely corrective action has been taken to close out audit findings
- The shore-based management is monitoring and providing the necessary support in implementation of corrective actions,
- Audit reports and possible corrective actions should be carried out in accordance with documented procedures and records are available ashore and on board,
- The results of the audits and reviews should be brought to the attention of all personnel having responsibility in the area involved
- Company has developed and implemented a procedure for risk assessments, and appropriate safeguards have been

and the environment,

- The Company should periodically verify whether all those undertaking delegated ISM-related tasks are acting in conformity with the Company's responsibilities under the Code.

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Steps	To do	To do	To do	To do	To do
Audit preparation	Check status of ship, company	Prepare timetable	Prepare Checklists/ Forms / Check Standards/ Guidelines	Note documents to review / Identify records to sample	
Opening meeting	Introduce the auditors	explain scope of audit	Note participants		
Conducting the on-site audit	document review: Quality manual / Procedures/ Work instructions / Other documents	Looking at records	Interviewing people at all levels	Physical tour onboard	Operational tests, drills
	Preparing audit conclusions				
Closing meeting	Conducting the closing meeting	explain findings, discuss corrective actions	Note participants	Suggest improvements	Deliver reports, findings

Effective writing of non-conformances:

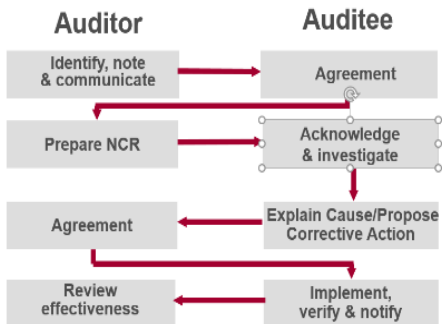
Non-conformity (Minor) means an observed situation where objective evidence indicates the non-fulfilment of a specified requirement.

Major non-conformity means an identifiable deviation that poses a serious threat to the safety of personnel or the ship or a serious risk to the environment that requires immediate corrective action or the lack of effective and systematic implementation of a requirement of this Code.

Objective evidence means quantitative or qualitative information, records or statements of fact pertaining to safety or to the existence and implementation of a safety management system element, which is based on observation, measurement or test and which can be verified.

Non-conformity Report	
The requirement (what was supposed to be)	The evidence (what actually is)
	Examples of Objective Evidence <ul style="list-style-type: none">• Factual evidence of differences between the Safety and Environmental Manual and associated procedures,• Factual evidence of differences between procedures and working practices,• Lack of evidence to support implementation of various standards,• Lack of evidence to show continuous implementation of various parts of the system
Corrective Actions “Action(s) need to be taken to eliminate the cause(s) of a detected non-conformity or other undesirable situation”	Preventive Actions Action(s) to eliminate the cause of a potential non-conformity”

Non-conformity Report and Corrective Actions



ISM Code interrelation with the International Ship & Port Facility Security (ISPS) Code:

- The ship is provided with an approved Ship Security Plan (SSP),
- The company has assigned a Company Security Officer (CSO),
- Crew is aware of the identity and contact details of the CSO,
- Posters with the identification and contact details of the CSO, are displayed at prominent locations onboard,
- Access to the ship must be controlled through an efficient system of gangway watchmen, visitor identification and checking of personal belongings,
- Restricted areas must be identified (are listed in the SSP) and access to these compartments is forbidden/controlled,
- The ship security officer and crew assigned with security duties should be familiar with the security procedures and their individual security duties.
- Stores, spares and provisions should be liable to search as required,
- All security equipment must be in good operational condition,
- The ship is provided with Ship Security Alert System (SSAS) frequently tested with the Company Security Officer (CSO),
- Drills and exercises must be carried out and recorded as required by the SSP.

ISM Code interrelation with the Maritime Labour Convention, (MLC 2006):

- The ship is provided with a Declaration of Maritime Labour Compliance Part-I (DMLC P-I) issued by the Flag Administration,
- The ship is provided with a Declaration of Maritime Labour Compliance Part-II (DMLC P-II) issued by the ship-owner and is approved by the RO,
- no under-age (16 y) persons work on a ship,
- All crew hold valid medical fitness certificates,
- Officers and ratings hold valid certificates and flag endorsements as per the International Convention on STCW,
- Safety induction, shipboard familiarization and safety training of crew have been carried out as per SMS,
- Crew is able to demonstrate their familiarity with the SMS commensurate to their role and responsibility,
- All seafarers are issued with employment agreements meeting the provisions of the MLC2006, signed by them and must be available onboard,
- All seafarers shall be paid for their work regularly and in full in accordance with their employment agreements on monthly intervals,
- Watch-keeping schedules have been established respecting the requirements of STCW'95 & MLC2006 and a record of hours of rest is being maintained, (maximum hours of work: 14 hours in any 24-hour period, minimum hours of rest shall not be less than 77 hours in any seven-day period)

- Verify valid financial securities (e.g. P&I) for repatriation of the seafarers in case of abandonment, in the case of sickness and injury, loss or unemployment arising from the ship's loss or foundering,
- The Crew on board meets or exceeds the minimum safe manning criteria established by the flag Administration. Verify the Crew List,
- Adequate food and drinking water supplies, having regard to the number of seafarers on board, their religious requirements and cultural practices as they pertain to food, and the duration and nature of the voyage, shall be suitable in respect of quantity, nutritional value, quality and variety;
- The ship is provided with qualified cook (if crew>10p) or instructed persons engaged in food preparation (if crew<10p)
- The ship is provided with medicines and medical guide, properly maintained and inspected at regular intervals, not exceeding 12 months