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Guidelines for Internal Audit of ISM Code

Co-funded by the European Union

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IMO ISM Code: Before Audit Check-list

The objectives of the IMO ISM Code[1] are to ensure safety at sea, prevention of human injury or loss of life, and avoidance of damage to the environment, in particular, to the marine environment, and to property.

Before conducting the audit/inspection the following questions should be answered.

Has the company provided:

- Procedures for safe practices in ship operation and a safe working environment; an assessment of all identified risks to its ships, personnel and the environment and establish appropriate safeguards? Yes No
- A means for continuously improve safety management skills of personnel ashore and aboard ships, including preparing for emergencies related both to safety and environmental protection? Yes No
- A verification system for ensuring compliance with mandatory rules and regulations? Yes No
- A check-list that applicable instruments/codes, guidelines and standards recommended by the Organization, Administrations, classification societies and maritime industry organizations are taken into account? Yes No

[1] ISM Code Part A contains 12 elements related to implementing the code. These prescriptive elements place responsibility for the safe and clean operation of ships on the Master, the DPA and the company, without giving explicit instructions. The 12 elements are: General which includes definitions, objectives and application of the ISM Code; Safety and environmental protection policy; Company responsibility and authority; Designated person ashore; Master's responsibility and authority; Resources and personnel; Development of plans for shipboard operations; Emergency preparedness; Reports and analysis of non-conformities, accidents and hazardous occurrences; Maintenance of the ship and equipment; Documentation; Company verification, review and evaluation.

ISM Code Part B pertains to certification and verification of compliance with the code. Part B elements are: Certification and periodical verification; Interim certification; and Verification (The ISM certification process, initiated at the request of a company, consists of the following stages: Initial verification, after which interim and, eventually, full certification will be issued; annual verification of the company DOC; Intermediate verification of the Safety Management Certificate (SMC) between the second and third anniversary of the issue; Renewal verification for both on the fifth anniversary of the issue; Additional verification whenever further surveillance is deemed necessary by flag or port state inspections

For a properly functioning ISM safety management system, preparations for an ISM audit should be minimal. Preparations should be limited to ensuring that the correct documents, certificates, procedures, records and reports are on hand and can be accessed during the briefing interview with the auditor. These include:
PM records; Hours of rest; Officer and crew certificates; Record of non-conformities and master's review; Crew training and drill record; Checklist folders for procedures; Crew familiarisation records; Bridge and navigation records; Up-to-date bridge p/ps, corrections and publications; Drill and training records; Procedures in place for principal operations; and Procedures being followed.

The ship's master would implement the environmental protection policy by ensuring that he has an overview of the tenets of MARPOL annexes 1 to 6 and verify that these are being followed. He should check that all associated documents and certificates are being correctly observed. The ship's master should also motivate the crew to meet the following requirements: Anti-fouling certificate is in place and good order; Ballast water management plan is in place and being demonstrably observed; Garbage management plan is in place and is being met; SEEMP is in place and being incorporated; ODME equipment is functioning and being correctly recorded in the ORB; Fuel SOX change-over records are complete.

- A safety and environmental protection policy? Yes No
- Instructions and procedures to ensure safe operation of ships and protection of the environment in compliance with relevant international and flag State legislation? Yes No
- Defined levels of authority and lines of communication between, and amongst, shore and shipboard personnel? Yes No
- Procedures for reporting accidents and non-conformities with the provisions of this Code? Yes No
- Procedures to prepare for and respond to emergency situations? Yes No
- Procedures for internal audits and management reviews? Yes No
- Handover procedures Yes No

Has the company provided the:

- List of ship's crew members? Yes No
- Details of the Designate Person(s)? Yes No
- Details of minimum level manning/Safe Manning Document for the vessel? Yes No
- List of all STCW certificates and medical fitness for each crew member including the Designated Person(s)? Yes No
- Appraisal records of officers and ratings Document of Compliance (DOC) as per SOLAS Annex 1, MSC 1462, MEPC Circ. 817 ad Fal Circ. 177? Yes No
- Safety Management Certificate (SMC)? Yes No
- Is the SMC an Interim Certificate? Yes No
- Is there an International Security Certificate? Yes No
- Document / Letter copy to Flag delegating responsibility of ship management (where relevant), and do the details of ship management corelate with the details in the DOC and CSR? Addition requirements due to the type of ship or cargo? Yes No
- A record of all its corrective actions? Yes No
- A record of all preventive actions? Yes No

Depending on the ship type are the following certificates available:

- International Noxious Liquid Substances (NLS) Certificate and IOPP (International Oil Pollution Prevention) Certificate? Yes No
- International Air Pollution ~~and~~ Prevention (IAPP) Certificate? Yes No
- Evidence for the requirements of MARPOL Dangerous Goods and Annex IV 4 Reg 5 MEPC Circ. 408? Yes No
- Energy Efficiency Certificate(s)? Yes No
- Passenger Ship Safety Certificate? Yes No
- Special Trade Passenger Ship (STP/SSTP)? Yes No
- Single Hull Tankers >15 years old Certificate of Compliance Yes No

With regard to maintenance requirements:

- Is there evidence of an effective maintenance system? Yes No
- Has the ship carried out 5 yearly CAS (Condition Assessment Scheme) Yes No
- Carried out an Enhanced Survey Programme (CAP) Yes No
- Has all the maintenance Documents to date? Yes No

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2. IMO ISM Code: During Audit Process

Is there evidence of:

- The Master having overriding authority for the safety of the crew,
- Ship and the environment Yes No
- Are details of company organisation chart, lines of communications,
- and job descriptions available? Yes No
- Are Clear and simple set of instructions available to crew including
- officers e.g., Master's standing orders, night orders, Master's
- circulars, etc.? Yes No
- SMS familiarisation of the crew including officers Yes No
- Motivation to follow SMS along with evidence with the aim of
- promoting motivation by organising safety debates, lectures,
- competitions, presentation of safety awards etc.? Yes No
- Review of previous audit reports, non-conformities
- Accidents/incidents or hazardous occurrences? Yes No
- Regular review of SMS and suggestions for changes to shore
- management? Yes No

Additional questions:
Has there been recent changes in ownership, flag State and classification society?
Is updated CSR available? Yes No

If yes, is company fully aware of implications associated with ISM Code and corresponding SMS requirements? Yes No

Could you also verify the following during the audit/inspection:
. Are auditors' report(s) on non-conformities, accidents and hazardous occurrences followed-up? Yes No
. Are non-conformities clearly linked to ISM Code requirements and the SMS? Yes No

. Are relevant Conventions, Regulations, Codes, Standards and Industry Guidance available on the ship, or can be accessed digitally? Yes No
. Does the ship's SMS have a maintenance routine, which includes the testing of stand by equipment and critical equipment/systems, and are records available? Yes No
. Are records of risk assessments and appropriate safeguards available? Yes No

. Are procedures/records of how the company deals with request for resources available? Yes No.

. Is relevant documentation regarding the SMS in a working language understood by crewmembers? Yes No
. Are programmes and records for drills and exercises to prepare for emergency actions available? Yes No
. Are introduction/familiarization procedures for crewmembers carried out in accordance with documented procedures? Yes No
. Are crewmembers able to communicate effectively in the execution of their duties related to SMS? Yes No
. Is there evidence of repetitive observations or non-conformities from previous

ISM Code audits? Yes No

. And have these been considered at safety committee meetings and SMS review? Yes No

. Does the company keep the Safety Management documentation on board? Yes No

. Is there evidence that the master has carried out the review of the SMS? Yes No

. Can senior officers identify the “designated person” responsible for the operation of the ship and the means to contact that person? Yes No

. Have the procedures for establishing contact with shore management in an emergency been tested? Yes No

. Are emergency plans/procedure available on board, along with evidence of shore-based company emergency response and contract with ERS? Yes No

. Are records of inspections, condition and maintenance reports available? Yes No

. Are records to tests, sample analysis, calibration records, outcomes of routine checks, completed checklists, etc., available?" Yes No

. Are records available related to amendments, upkeeping, retrieval, storage and destruction of documents. Yes No

. Does the company consider that the incident and accident assessors including investigation agencies should standardise their reporting system and focus on human performance? Yes No

Do you apply any of the KPIs listed below when assessing/monitoring the ISM Code implementation?
(The list of KPIs below is not exhaustive and other relevant KPIs may also be considered).

- The number of ships registered with the Administration implementing the ISM Code. Yes No

- The number of ships inspected by the Administration implementing the ISM Code. Yes No

- The number of non-conformities identified during ISM audits. Yes No

- The number of accidents and incidents involving ships registered with the Administration implementing the ISM Code. Yes No

- The number of accidents and incidents attributable to human error. Yes No

- The number of SMS certificates issued by the Administration. Yes No

- The percentage of ships holding valid SMS certificates. Yes No

- The number of inspections carried out by the Administration. Yes No

- The number of deficiencies identified during SMS verification. Yes No

- The number of accidents and incidents involving ships with valid SMS certificates. Yes No