



Italian Coast Guard

EMSA

Training on ISM Simulated Audit

HOW TO PLAN AN AUDIT?



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The Safety Management System

In order to comply with the requirements of the ISM Code every Company should develop, implement and maintain a SMS.

The SMS should embrace the objectives of the Code 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.



Compliance with the requirements of the ISM Code should be verified by determining:

- that the SMS meets the requirements of the ISM Code; and
- that the objectives laid down in paragraph 1.2.1 of the ISM Code are met.
- that personnel have received the appropriate training and familiarisation in the tasks for which they are responsible
- that they are carrying out their work in accordance with the Company's procedures
- that tasks are being carried out with due regard for safety



The Audit Plan

In preparation for the audit the lead auditor should prepare and agree an audit plan with the Company.





The audit plan should include the following:

- the dates and times at which the audit will be carried out
- the location of the office(s) to be audited
- timing of the Opening Meeting
- company personnel to be interviewed
- areas to be audited
- members of the audit team and
- timing of the Closing Meeting



The auditors should examine the Company's documentation, files and procedures taking into consideration that auditing is a sampling process and that not every file and procedure can be examined within the time allocated for the audit. In addition to the audit of files and other appropriate documentation, time must be allocated for interviews and discussions with members of the management team. The time allocated for the audit will be dependent upon the size and complexity of the Company and the number of ships in the fleet.



Responsibilities of Lead Auditor

The responsibilities of the lead auditor include the following:

- liaising with the Company
- reviewing the Company's documentation
- raising the company /ship file
- preparing an audit plan
- selecting the audit team, including verifying their auditor qualifications
- chairing the Opening Meeting
- co-ordinating the audit
- chairing the Closing Meeting
- agreeing corrective action with the Company and the timescale for completion
- completing the declaration
- preparing the certificate(s) for issue
- preparing the audit report



Typical Agenda for Opening and Closing Meetings

A typical Opening Meeting Agenda will include the following elements and be applicable to both DOC and SMC audits. The meeting should be chaired by the lead auditor.

Introductions should be made between members of the audit team and the Company's management.

A record of Company personnel who attended the meeting should be kept and included in the Audit Report. The purpose and scope of the audit should be explained.



The audit plan, drawn up in advance, should now be approved and any changes agreed. This will include, but not be limited to, the sites to be visited, persons to be interviewed, documentation to be reviewed and the timing of meetings and meal breaks.

Flexibility is essential.



The method of carrying out the audit should be outlined and will include, but not be limited to, the following:

- interviews with key members of the management team as laid down in the audit plan
- a detailed examination of the SMS; familiarity with and understanding of the safety and environmental policy, manuals, procedures and instructions, working practices, recruitment and training records, management reviews, internal audits, classification records, accident and non-conformity reports
- discussions with members of staff at all levels
- the raising of non-conformities and that they should be drawn to the attention of a Company representative at the time that they are identified



The disclaimer should be clearly explained in as much as that if no non-conformities are identified in a particular area it does not necessarily mean that none exist.

Similarly if non-conformities are raised it does not necessarily mean that these are the only ones in that particular area. Auditing is a sampling process and the auditor(s) may not identify all existing non-conformities.

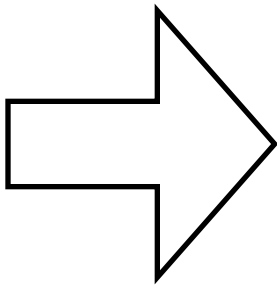
Company representatives should be given an opportunity to raise questions.

The meeting should be formally closed.



Audit Plan1

inserire audit plan



Audit Plan2

inserire audit plan



Assessing the Safety Management System

The objective of the audit is to verify that the SMS has been effectively implemented within the Company's management structure both ashore and on board. The methodology of the assessment will include the verification of compliance with procedures by means of interviews with personnel at all levels within the organisation and the examination of records etc. During the course of the audit the auditor(s) may raise non-conformities against the SMS.



Non-conformities are identifiable deviations within the SMS. All non-conformities and observations must be supported by irrefutable objective evidence. Any perceived non-conformities and observations must be discussed with the Company's representatives before a Non-Conformity Note is raised. Non-conformities fall into three categories:

- | | | | |
|----|-------|-----|---------------|
| a) | major | non | conformities; |
| b) | | non | conformities; |
| c) | | | observations. |



Human

Element

The objectives of the ISM Code 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. The achievement of these goals is heavily dependent on the human element i.e. the people who operate the system. The knowledge and experience of the officers and crew, their familiarity with the Company's SMS, their training and records thereof should be checked by observation and interview.



Where practicable, the auditor(s) should witness as many on board procedures as practicable and these may include, but are not limited to:

- pre arrival and departure checks on the Bridge and in the engine control room;
- securing the vessel for sea;
- voyage planning;
- navigational briefing;
- mooring stations fore and aft;
- bridge procedures in harbour;
- engine room operations;



preparation of machinery for sea;

- machinery maintenance including system preparation;
- anchor stations;
- bunkering operations;
- pilot embarkation/disembarkation;
- passenger musters and handling;
- cargo operations/handling;
- watch handover;
- onboard training;
- new joiner (crew) instructions;
- emergency drills;
- safety committee meetings;
- routine inspections;
- navigation under pilotage; and
- watchkeeping at sea.



Observation

An observation means a statement of fact made during a safety management audit and substantiated by objective evidence.



Non-Conformity

A non-conformity means an observed situation where objective evidence indicates the non-fulfilment of a specified requirement of the ISM Code.



Major

Non-Conformity

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



Audit Reports

An audit report should be completed to record the audit findings.

The report for Document of Compliance Audit should include the following:-

- a list of the audit team members;
- a list of personnel interviewed and positions held within the Company;
- an assessment of compliance with each relevant section of the ISMCode;
- the types of ships managed by the Company;
- the operational patterns of the Company's ships; and
- any non-conformities and observations raised



Audit Report for Safety Management Certificate Audit

The report should include the following:

- names and ranks of auditees
- names of audit team members;
- an assessment of compliance with each relevant section of the ISM Code;
- the type of ship and employment patterns; and
- any non-conformities and observation raised



Close-out of Major and Minor Non-Conformities

When a major non-conformity is raised corrective action must be implemented before a new certificate can be issued or an existing certificate endorsed at annual (DOC) or Intermediate (SMC) verification. A major non-conformity may be down graded to a minor as soon as appropriate initial corrective action has been taken. Corrective action against this minor non-conformity may then be agreed and a corrective action time-scale agreed. A significant number of minor non-conformities identified against the same section of the ISM Code may be issued as a single major non-conformity.



When an auditor identifies a major non-conformity, agreement **MUST** be sought immediately from the head of the department concerned since it may be possible for corrective action to be implemented prior to the conclusion of the audit. When an auditor identifies a potential minor non-conformity, agreement must be reached with the manager of the department or area concerned that the perceived non-conformity actually exists. Agreement should be reached prior to the closing meeting. Suitable corrective actions and appropriate corrective action time-scales must also be discussed and agreed with the company.



Corrective

Action

The Company is responsible for ensuring that the agreed corrective actions are completed by the agreed dates. Failure to correct non-conformities may affect the validity of certificates. Corrective action and possible follow-up audits should be completed within the agreed timescale.

Closing-out of minor non-conformities will not normally require a revisit by an auditor.



Written notification of the completion of corrective action, accompanied where possible by objective evidence, shall be forwarded to the lead auditor through the Designated Person.

When the lead auditor is satisfied that the agreed corrective action has been completed the Non-Conformity will be closed out. During annual audits the opportunity should be taken to confirm that non-conformity notes raised at the previous audit have been closed out on time. The corrective actions may also be verified. In the case of SMC audits the foregoing may be achieved during the next audit.



Cancellation or Suspension of DOC or SMC

Only the issuing Administration may cancel or suspend a DOC or SMC. When a major non-conformity has been identified the Administration may either suspend or cancel the DOC and require such a certificate to be surrendered. In this case all SMCs associated with the DOC will likewise be invalidated rendering the ship(s) liable to detention.

Thank you!