

ISPO C par2.4.4 WORKING DOCUMENT

During the IUG Meeting of Associates in Kuwait there has been a discussion on the requirements for external auditors as documented in ISPO Part C paragraph 2.4.4.

The IUG Working Group has reviewed this paragraph (action 2016-12) and proposes to amend the text as follows:

Current text:

- 2.4.4 It is the responsibility of the classification society to provide competent auditor(s). The basic requirements of an auditor are:
- Certificate of an IRCA-approved lead auditor-course or similar level approved by the IUG Board.
 - Holds an STCW 78 (as amended) maritime management level qualification and a minimum of at least one year experience in a senior position on board of a vessel
 - Thorough knowledge of the ISPO

Proposed text:

- 2.4.4 It is the responsibility of the classification society to provide competent auditor(s). The basic requirements of an auditor are:
- **Marine Management Systems auditor as per IACS PR10 or IRCA Lead Auditor as mandatory for ISO Certification Scheme Auditors.**
 - Holds an STCW 78 (as amended) maritime management level qualification and a minimum of at least one year experience in a senior position on board of a vessel
 - Thorough knowledge of the ISPO

MORE INFORMATION:

The Working Group has been in contact with the three recognized classification societies (Lloyds, DNV-GL and Bureau Veritas) on this matter.

It appears that:

- An IRCA-approved lead auditor-course is mandatory for ISO Certification Scheme Auditors. IRCA is primarily linked to ISO audits and required when performing these. ISO audits are primarily land-based focused.
- Maritime related management systems (for example ISM) are based on IACS **), since this is what the maritime industry and class societies embrace and what is audited by IACS.
- Lloyds have not distanced their selves from IRCA **) approved courses, but from corporate IRCA registration for their auditors. All courses are and will be fully IRCA approved.

So the current requirements are difficult to comply with as most IRCA auditors in the world cannot relate to the maritime industry and will not meet the other criterion:

Holds an STCW 78 (as amended) maritime management level qualification and a minimum of at least one year experience in a senior position on board of a vessel

IACS PR10 in the proposed amended text is an IACS document on the 'Procedure for the Selection, Training, Qualification and Authorisation of Marine Management Systems Auditors'

By leaving 'IRCA Lead Auditor ' in the text auditing ISPO remains possible for auditors with an ISO background provided they comply with the second dot: 'Holds an STCW 78

**) IRCA = International Register of Certified Auditors.

***) IACS = International Association of Classification Societies.

Attached are pages 3 and 4 of IACS PR10 showing the 'Competence requirements for marine management systems auditors' and the 'Selection Criteria'.

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1. General

1.1 This Procedural Requirement describes the IACS requirements for the selection, training, qualification and authorisation of marine management systems auditors responsible for verifying compliance with the ISM and ISPS Codes. These requirements have been developed in accordance with the provisions outlined below.

1.2 Paragraph 4.2 of Appendix 1 of IMO Resolution A.739(18) *“Minimum standards for recognized organizations acting on behalf of the Administration”* requires Recognised Organisations to provide “a systematic training and qualification regime for professional personnel engaged in the safety management system certification process, to ensure proficiency in the applicable management criteria as well as adequate knowledge of the technical and operational aspects of shipboard operational management”.

1.2bis Paragraph A2.3.5.2 of Appendix 2 of IMO Resolution MSC.349(92) “Specifications on the survey and certification functions of recognized organizations acting on behalf of the flag state” and MEPC.237(65) requires that “the system shall comply with the qualification and training requirements for ISM Code assessors contained in the Guidelines on Implementation of the International Safety Management (ISM) Code by Administrations” adopted by Resolution A.1071(28).

1.3 Paragraphs 3 and 4 of the Appendix to IMO Resolution A.1071(28) *“Standards on ISM Code certification arrangements”* contain standards of competence and qualification arrangements for those who are to participate in verification of compliance with the requirements of the ISM Code.

1.4 Paragraph 4.2 of Appendix 1 of IMO Circular MSC/Circ.1074 *“Interim guidelines for the authorization of Recognized Security Organizations acting on behalf of the Administration and/or Designated Authority of the Contracting Government”* requires “the provision of a systematic training and qualification regime for its professional personnel engaged in the maritime management system certification process to ensure proficiency in the applicable quality and security management criteria as well as adequate knowledge of the technical and operational aspects of maritime security management.”

2. Competence requirements for marine management systems auditors

2.1 Those responsible for verifying compliance with the requirements of the ISM and ISPS Codes must be able to demonstrate knowledge and understanding of:

1. The principles and practice of management systems auditing.
2. The requirements of the ISM and ISPS Codes and their interpretation and application.
3. Mandatory rules and regulations and applicable codes, guidelines and standards recommended by the IMO, Administrations, classification societies and maritime industry organisations.
4. Basic shipboard operations including emergency preparedness and response.

See Appendix 1 for a more detailed list of learning objectives.

2.2 In addition, they must demonstrate that they have the ability to apply such knowledge and understanding and that they are capable of carrying out effective verification audits of the

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shore-based and shipboard aspects of marine management systems against the ISM and ISPS Codes as applicable.

2.3 The competences described above may be acquired as a result of any combination of the following:

1. Previous relevant qualifications and experience.
2. Theoretical training.
3. Practical training.

3. Selection Criteria

3.1 In order to be accepted for training as a marine management systems auditor, the candidate must have, as a minimum:

Either a qualification from a tertiary institution recognised by the Administration or by the Classification Society within a relevant field of engineering or physical science (minimum two-year programme);

Or a qualification from a marine or nautical institution and relevant seagoing experience as a certificated ship's officer.

3.2 In addition, the candidate must have at least five years experience in areas relevant to the technical or operational aspects of shipboard operational management. Such experience may be gained in the following ways:

- ship classification or statutory surveys; or
- sea-going service as a certificated watch-keeping officer; or
- employment in a technical role (for example, technical manager, superintendent, operations manager) in a ship management company; or
- any combination of these three.

3.3 Exceptionally, alternative qualifications and experience may be considered provided that they can be shown to be at least equivalent to those specified in paragraphs 3.1 and 3.2 above, are an acceptable basis for marine auditor training and are sufficient to ensure the candidate's credibility in the eyes of the administrations, the companies and the industry as a whole.

4. Theoretical training

4.1 Theoretical training should address all the areas listed in paragraph 2.1 above. The time spent on each topic and the level of detail that it is necessary to include will depend on the qualifications and experience of the trainees, their existing competence in each subject, and the number of training audits to be carried out.

4.2 The training may be modular in structure, in which case the period over which the theoretical training is delivered must not exceed twelve months.

4.3 A minimum of ten days of theoretical training shall be provided. Where appropriate, some elements may be delivered by means such as distance learning and e-learning. However, at least fifty percent of the total theoretical training days shall be classroom-based in order to allow for discussion and debate and to allow candidates to benefit from the experience of the trainer.