# Safety Management in Sail Training: Guidelines for vessels under 200gt

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## What is a Safety Management System

A Safety Management System (SMS) is an organisation wide process that ensures policies and procedures are appropriate and followed. Contrary to popular belief, it is not another file to put on the shelf, but more of a system to encourage and improve safety culture across the whole organisation. It requires commitment from the Chairman at the top of the organisation through to the newest trainee Boatswain's Mate.

**CREATING A SMS IS NOT A PAPERWORK EXERCISE** instigated by the 'office'. It cannot be denied that documented policies and procedures are central to a SMS. However, organisations will have most of these documents already in place. The SMS merely identifies which of the policies are central to the safe management of vessels and puts them in one place. Sea staff should not need to read through the procedure for claiming expenses or wearing corporate shirts when trying to find the seacock location plan.

An MCA report into safety culture[1] identified the top three barriers to safety as:
1. Undermining the authority of the skipper by micro management from ashore
2. Financial constraints resulting in lack of critical resources
3. Increased paperwork

An effective SMS should involve people from all sections of the organisation; senior management, office staff, sea staff and volunteers are all essential to ensure the system's usefulness, and to encourage buy-in from the whole organisation. The barriers identified above should be avoided in your system by (1) defining who has what responsibility and authority, clearly showing the lines of communication to ensure operational staff have sufficient leverage for (2) addressing lack of safety critical resources, and (3) should not put priority on completing paperwork saying you have done something above **actually doing something.** It should also provide comfort to those with a legal responsibility that management of safety is being carried out.

### Where does it come from?

The ISM[2] Code was introduced in 1998 and is compulsory for all vessels over 500GT. The Large Yacht Code incorporates guidelines for the implementation of a safety management code for vessels between 200GT and 500GT. Domestic passenger ships (e.g. the Gosport Ferry) have their own safety management code, but at present there is no provision for a SMS in the Small Commercial Codes of Practice, although it is likely they will be included, in some form, in future editions.

It should be noted that it is not being suggested that full ISM, or anything like it, be implemented on any Sail Training vessels that do not already do so. ISM is a large and complex system designed for large vessels, and would be far too difficult, and unnecessary, for most organisations to implement. There is a reason that only vessels over 500GT have to comply!

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[1] http://www.mcga.gov.uk/c4mca/mcga-research_report_521.pdf
[2] International Safety Management

### Why do we need to do it?

The lack of a SMS in SCVs[3] is at odds with the norms within the rest of the maritime world. A recent MAIB investigation[4] focused on this fact, resulting in a working group being set up, consisting ASTO and MCA representatives, to draft a best practice document with regard to safety management in Sail Training. This is the document you are currently reading.

ASTO members are invited to trial the system and suggest changes and improvements. This is an opportunity to shape a system that is appropriate and workable in the Sail Training industry.

## Overview of the proposed system

There are three main areas to the proposed system:

1. Centralising documentation already in existence, (updating and adding to it as necessary) into one Safety Management System
2. Defining the communication structure within the organisation to facilitate learning and dissemination of information
3. Defining the methods of monitoring the success of the system, with a mechanism for improvement as required.

### Centralising Documentation

**The basic principle of SMS is: Say what you do, do what you say, record it.**

### Say what you do and do what you say

Annex 1 provides a trigger list of policies and procedures that you may need in your organisation. It is not exhaustive or definitive, but is grouped under the broad headings of the Domestic Passenger Vessel Safety Management Code (see "Further Reading"). If you do not have one of the items on this trigger list, consider whether you need to add it. If you decide not to, then it should be an informed decision that you can defend.  It is recommended that a working group made up of a cross-section of staff and management undertake this review to ensure it matches real life. **Do not be fixated with creating new policy – your old ones have served you well so far.** It is possible that in some instances what you currently have written down is not what really happens, so you either change what happens or change what is written. There may also be common practices (procedures )which everybody knows about but which are not documented anywhere. These should be added. At the end of this review you should have a list of current documents that will form part of your SMS, and a list of things to add. Do not get too focused on adding all deficiencies over night.

At the end of the initial review you will be able to recognise the policies and documents, which make up the 'paper' side of your SMS. E.g. Our SMS consists of our Child Protection Policy, Health and Safety policy, Standard Operating Procedures, Standing Orders and the Staff Training Handbook Assessment Annex.

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[3] Small Commercial Vessels
[4] See TS Royalist report on www.maib.gov.uk

### Record it

As part of the monitoring of the system there should be a record that tasks are carried out – hence recording actions. A key word here is 'appropriate', as the last thing we need to do is create more forms and paper work that aren't necessary (remember barrier number three at the beginning?). In many cases recording will already take place E.g. Fuel and water level checks recorded in a notebook, a defects book, or crew lists updated when new crew arrive, but there will be others that are not. In most cases a simple entry in the logbook would suffice – 'MOB drill carried out', 'changes of watch', 'navigational lights switched on', 'sail changes'. The importance of the logbook as a legal document should not be forgotten.

Checklists deserve a brief mention now. Most of you will use checklists within your organisation – e.g. daily cleaning routine on a laminated list, but a checklist can also be used to greatly reduce the need for form filling, and act as a useful aide memoir. Perhaps most obvious is the pre-voyage safety brief – have it on a checklist (NB just a laminated trigger list to remind you, not necessarily a form to fill in and file) and once complete a quick note made in the logbook - Pre-voyage safety brief complete accompanied by a signature.
THE CREATION OF NEW RECORDING BOOKS OR LOGS MAY BE REQUIRED, but it should not be the default position.

### Defining the Communication Structure

A clear organisational chart should exist so that everybody knows who answers to whom, where lines of communication exist and how everybody fits together. Annex 2 gives a very simple example. The contact details and preferred methods of communication should be clear.
An example of important communication is that between skippers from one voyage to the next. The skipper, as a commercially qualified seafarer, takes on a huge amount of responsibility. It is important that skippers know the material state of the vessel and any information of importance during their time in command. Skipper handovers may not always be face to face, but the method of communication used, and the content to be transferred should be clear. It could be based on an electronic document held on the vessel's computer, it could be a paper pro-forma to fill in and leave onboard, or it could be a phone call covering the required information as detailed in a checklist. There isn't one best way, but the method should be clear, and the fact that the handover occurs should be recorded – all a phone call would require is a note in the logbook to say, 'handover brief received'. In summary, your SMS should identify what needs to be communicated and how it is communicated, and then have a simple way of recording it has happened.

The dissemination of information, particularly policy information or how to operate new equipment, becomes much harder when volunteers or occasional staff are used. The following two elements are considered to be important in achieving this:

- It is strongly recommended that annual updates take place. Meetings or training days are the ideal way, although much information can be provided via newsletters and/or websites
- Methods of dissemination of updates to procedure, policies or of lessons learnt from incidents must be carefully considered. Email, website and newsletters should all be considered as methods of disseminating information.

Assuming you are able to pull together the various documents into one recognisable SMS file, then it will be possible to make an annual edition available to each volunteer and/or occasional staff member. This could be very cost effectively produced in an electronic format available from your website. This would enable them to refresh themselves of the policies and procedures before joining the vessel. The primary copy onboard could include a log at the beginning for each member of staff to sign to say they have read this year's edition.

The only element to consider is updates or lessons learnt through the year, post publication of the annual edition.

The recommended approach is that the updates are not only entered into the primary copy onboard, but a duplicate of the changed text be filed onboard in a separate folder, filed in date order. From this staff need only read the entries in the updates folder from the their last date onboard to be up to speed. It is worth bearing in mind that updates are not likely to be arriving on a weekly or monthly basis so this should not involve large amounts of work.

## Monitoring the Success of the System

An audit is a snapshot of how well the system works, and this can be a simple tool to get a general feel of how a vessel is run. It is worth emphasising that an audit is of the system, not of the people using the system.

One element of an audit is ensuring the relevant paper orientated actions have taken place: Correct use of logbook, passage planning, handovers, accurate crew-list information etc. The audit need not be carried out in full in one 'sitting', various elements of the system may be checked periodically throughout the year. This can be carried out in maintenance periods or change over days and need not be intrusive.

Of more importance is the appraisal of the system in practice i.e. going to sea and ensuring what really happens, is what is supposed to happen (Say what you do, do what you say). Wherever possible, each vessel should be audited annually, which may be carried out by an internal member of staff, a volunteer with appropriate sea going expertise or by an external third party. In many ways an external third party is preferable, as they will not only assess the actions against the policy/procedure, but they will be viewing the policy/procedure with a fresh eye. This is not the senior staff checking the junior staff – anybody who can interpret the procedures can judge if they are being followed, and if not everybody should have an input into why not – it is just possible that it is a stupid procedure and that it should be changed.

In addition to these audits, the appropriateness of the system should be reviewed periodically. Assuming the audits and lines of communication are working, unworkable or irrelevant procedures should be identified, modified, removed or updated on an ongoing basis. Regardless of this, a review should occur at least every three years.

## Further Reading

**SMS for Domestic Passenger Ships:**
'MSN 1754' and 'MGN 158(M)'
*available from [http://www.mcga.gov.uk/c4mca/msn1754.pdf](http://www.mcga.gov.uk/c4mca/msn1754.pdf)*
*and [http://www.mcga.gov.uk/c4mca/mgn158.pdf](http://www.mcga.gov.uk/c4mca/mgn158.pdf)*

**SMS in the Large Yacht Code**:
'MSN 1792(M) Edition 2 Annex 2'
*available from [http://www.mcga.gov.uk/c4mca/msn_1792_edition_2.pdf](http://www.mcga.gov.uk/c4mca/msn_1792_edition_2.pdf)*

**SMS for Domestic Passenger Ships:**
'MSN 1754' and 'MGN 158(M)'

**SMS in the Large Yacht Code**:
'MSN 1792(M) Edition 2 Annex 2'

## Annex 1: Policy and Procedure Trigger List

**Policies**

- Health and Safety
- Child Protection
- Violent or Abusive Behaviour
- Drug and Alcohol

List which policies need to be complied with – Small Commercial Vessel Code or MGN 280, MGN 410 (Working at Heights) MSN 1802 Manning, Solas V, COSWP etc

**Responsibilities and Authority**

- Company

  Organisation Chart
  Trustees' / directors' responsibilities
  Clearly defined (and applied) assessment criteria for appointing staff and volunteers
  Delegation of specific responsibilities to committees, sub-groups or individuals
- Masters Authority
- Other Personnel (Both Paid and Unpaid)
  Shipboard
  Shore-based
  Volunteers
  Training and Assessment
- Records of statutory quals and expiry dates of certificates for all personnel

**Operating Procedures**

**Shipboard – ensure all staff read and sign their understanding regularly**

- Handover to oncoming staff (particularly the skipper) – ideally in person but if not a continuous 'handover log' is recommended
- Pre-voyage safety briefings – to be logged when completed
- Manning
  - o Any special requirements in pilotage or congested waters?
- Passage planning policy (written down either in log or separate notebook) – the passage plan should be approved by the Master.
- Watch Keeping
  - o Minimum manning and qualification levels
  - o Restricted visibility
  - o Watch systems
  - o Standing Orders
- Working Hours
- Sail handling and working aloft
  - o Key positions for staff during sail hoists, drops, tacking, gybing & trimming
  - o Supervision of trainees
- Use of Engines
- Deckwork manning and supervision when coming alongside / departing
- Pilotage
- Regular Emergency drills  - to be logged
- Risk assessments for activities including use of tender, swimming off the vessel, going aloft etc

**Shore-based**
- Supply chain
- Reporting
    - Routine
    - Incident / accidents
- Crew list and emergency contact details of all onboard

**Maintenance and Inspection**
**Record of expiry dates**
- Flares
- Batteries
    - Lifejacket lights
    - EPIRB
    - SART
    - Jonbuoy light
- HRUs
    - Liferaft stowage
    - Lifejackets
- EPIRB
- Fire Extinguishers
- Fire Alarm Systems
- Code Inspection /survey

**Planned Maintenance (checklist/notebook or onboard computer)**
- Period for each check – to be recorded with the date
    - *Daily, weekly, monthly, annual or other period*
- Precautions when carrying out maintenance/checks
    - Isolating machinery
    - Marking /protecting open hatchways, removed ladders etc
    - *COSHH*
- Engine and machinery checks and maintenance
- Rigging checks and maintenance
- VHF (fixed and hand-held), MF, HF, DSC
- AIS
- Inmarsat systems
- Testing of Safety Equipment
    - EPIRB
    - SART
    - Lifejacket inflate test
    - Lifejacket lights
    - Lifebelt lights

**Emergency procedures**
- Stowage and emergency equipment plans
- Grounding / Stranding
- Engine Failure
- Steering Failure
- MOB
- Rescue aloft

- Fire
- Collision
- Flood
- Knockdown
- Loss of Rig
- Abandon Ship
- Frequency of drills
- Accident reporting- both internally and externally (MAIB) – keep some forms on board

**Appendices**
- Checklists for repetitive tasks
- Checklist for Emergency Procedures
- MAIB reporting requirements
- Contact details of Key Staff
- Risk Assessments
- Job Descriptions
- Shipboard assessment forms (for staff promotion)
    - Watch Leader
    - Watch Officer
    - Boatswain
    - Mates
    - Skipper

# Annex 2: Sample Organisation Chart

**TRUSTEES**

**CHAIRMAN OF TRUSTEES**

**OTHER SUB-COMMITTEE**
*E.g. Child Protection Officer?*

**SENIOR STAFF MEMBER**

**SAFETY MANAGEMENT SUB-COMMITTEE**
*Trustee*
*Skipper*
*Office Manager*
*Volunteer*

**OFFICE MANAGER**

**BOOKINGS ADMIN**

**MAINTENANCE CO-ORDINATOR**

**MAINTENANCE VOLUNTEER**

**MAINTENANCE VOLUNTEER**

**SKIPPER**

**BOATSWAIN**

**VOLUNTEER 1ST MATE**

**VOLUNTEER 2ND MATE**

**VOLUNTEER WATCH OFFICER**

**VOLUNTEER WATCH OFFICER**