

## Seafarers Guide To ISM

### Background

As the responses to the survey started to be returned it became apparent that there were many, and widespread, misunderstandings and misconceptions held about some very basic ISM related issues. It seemed that much of the resentment and negativity being expressed by many of the respondents stemmed from misunderstandings about basic concepts. I tried to establish where these misunderstandings were coming from – was there a common source?

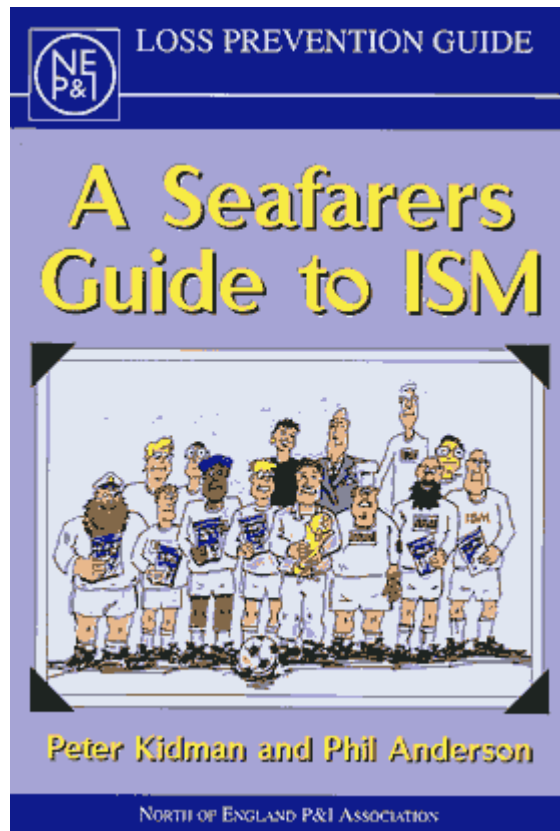
What I found caused me much concern and necessitated me breaking off from the main research project for a little while. I did not find a 'common source' but what I did find was a lack of any widely accessible 'introduction' to the principles and concepts of the ISM Code. There was the Code itself, published by IMO, there was an excellent commentary on the Code by the ICS / ISF and there was my own Practical Guide to the Legal and Insurance implications of the Code – but there appeared to be little else available, other than perhaps literature produced by individual ship operating companies for internal consumption, which would provide an easy route into the philosophy behind the ISM Code and how it was intended to work. The first chapter, as it were, appeared to be missing.

Bearing in mind the alarming misunderstandings that were coming to light in the research and the fact that we were rapidly approaching the deadline for phase 2 implementation of 1st July 2002 - I considered this omission so serious that I decided to produce something that would possibly fill that gap.

### **A SEAFARERS GUIDE TO ISM - Background**

Whilst many companies and seafarers have embraced the ISM Code as it was intended – it would appear that there are some who have still not quite grasped the fundamental ideas behind the Code and the way in which a Safety Management System should be structured and operated. There are a number of quite serious misconceptions and misunderstandings around and the guide attempts to provide an opportunity for overcoming some of those misunderstandings.

There are many different ways to communicate the same message. The 'Seafarers Guide to ISM' took the unusual step of presenting the same message in three very different styles.



A Seafarers Guide to ISM  
Anderson, Phil and Kidman, Peter  
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The first part of the book explains, in a no-technical and straightforward way the underlying concepts and philosophy behind the ISM Code. It is written in such a style that the Master, or onboard safety or training officer could use it as a basic structure for an onboard training course.

The second part sets out a whole range of 'frequently asked questions' – along with some answers. These questions were derived from the responses I had received from my survey into ISM implementation.

In my capacity as head of loss prevention and risk management at North of England P&I Club I had used cartoons in posters, calendars and presentations for many years with great success. Although the subjects are most serious – Seafarers do tend to have a great sense of humour and appreciate this type of approach. The third part of the guide uses a cartoon strip book to explain the concepts in a humorous and entertaining way – this is a new but also a logical development of the general idea. The cartoon strip book was also produced as a stand-alone publication for much wider distribution.

Because the guide had to be produced with some expedition I recruited two colleagues to assist me with its production. Peter Kidman is a Master Mariner and was Safety, Environmental and Technical Manager with Intercargo in London. I had been very impressed with his clear and easy to follow writing style from an earlier publication where he provided a guide to port State control. In the spirit of teamwork Peter made a significant contribution to the written text of the book using material I supplied from the research. My artistic abilities are not my strongest point – however, I have been fortunate to work with a number of brilliant illustrators on various projects in the past. One such individual was Peter Dixon. Peter who is not only a very talented artist but also capable of understanding the concepts which were developing in my mind's eye. Together we were able to convert the concept behind the ISM Code into a format that is much closer to home for many people – the necessity of teamwork in a football game if they are to be good enough to win the cup.

### Self-regulation and the duties of a shipping company

Irrespective of the duties bestowed on flag States and classification societies, the day-to-day responsibility for the safe, pollution-free operation and proper maintenance of a ship still rests with the shipping company and the crews it employs. The ISM Code now provides the ship and the company alike with a structure of 'management systems' within which to work, and one that places a strong emphasis on self-regulation.

In working with the Code, the task of complying with convention and class requirements should be made much easier. The Code does not add to the ship's regulatory burden, but it helps ensure that the existing rules and regulations can be properly complied with.

### AN INTRODUCTION TO MANAGEMENT SYSTEMS

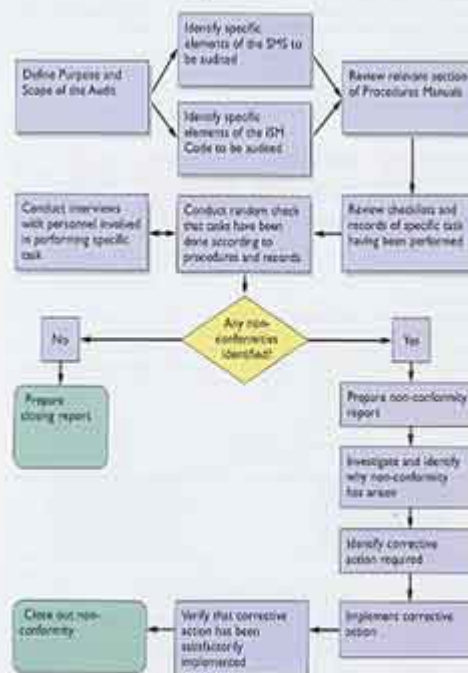
Many companies whom have used management systems to organise their business activities for many years. ISO 9000, a 'quality' management system, and ISO 14000, an 'environmental' management system, are two typical standards that have been widely used. Indeed some ships and shipping companies have started to implement these ISO standards, albeit on a voluntary basis.

In developing a management system, the company first needs to look at what it does and what it wants to achieve. It needs to identify all the important tasks that it carries out in its normal daily operations, and then write procedures describing those tasks to ensure that those tasks can be carried out in the same way on every occasion. Different companies can be expected to run their businesses in different ways, so no two management systems can therefore be expected to be the same. A good management system should always reflect the way the company actually operates with the people it employs. It should also be flexible and responsive enough to change as circumstances change, so at all times it can reflect what is best and current practice. Auditing is used to make sure that the management system is functioning correctly and smoothly at all times.

### Auditing

Auditing as compared to surveying or inspecting, places more emphasis on 'why' something is wrong and 'why' the management system did not prevent it from happening, rather than attempting to measure compliance on the basis 'what' is found to be wrong. The auditor will want to find out if the procedures were correctly followed and, if not, was that because the procedures were not understood.

### A Typical SMS Audit



Copies of the book can be ordered from:

Anchorage Associates  
275 St Margarets Road  
Twickenham  
TW1 1PN

Email: [simon@fullalove.com](mailto:simon@fullalove.com)

### Foreword by IMO

The Secretary General of IMO, Mr. William A. O'Neil, had been instrumental in the development of the ISM Code through its various stages at IMO and an avid supporter of its aims and aspirations. It was felt appropriate therefore to invite Mr. O'Neil to prepare a foreword to the book that would encourage its review and acceptance throughout the shipping community.

### A SEAFARERS GUIDE TO ISM - Forward by Mr. William O'Neil

The ISM Code is one of two features that have been designed specifically to address the human element in safety at sea – which continues to be cited as a causal factor in the majority of all transport accidents. The other 'human element' measure is the STCW Convention, which tackles the training, education and certification of seafarers.

The mandatory ISM Code provides an international standard for the safe management and operation of ships and for pollution prevention. It places direct responsibility on shoreside management to ensure that its ships operate to the prescribed level of safety.

Evidence so far suggests that the impact of ISM implementation has had a positive effect and is beginning to achieve its aim of creating a culture of safety within shipping companies throughout the world. Indeed, the reduction of accidents and incidents following ISM Code implementation reported by some companies and the encouraging results reported by port State control authorities with respect to ISM Code implementation on phase 1 ships, both point to the positive effects of the Code on operational standards.

It is of the utmost importance that the ISM Code is implemented effectively and with the proper degree of commitment from all concerned, and that is one of the major challenges facing the shipping industry during the next few years. It has the potential to make a huge contribution to maritime safety.

However, it will only do so if it is fully understood and embraced throughout the industry, on board ships as well as in the board rooms. It is in that spirit that this new Guide has been prepared for and targeted specifically at seafarers. It provides a straightforward explanation of the basic concepts that underpin the ISM Code and will leave seafarers better positioned to play their part in its successful implementation.

I have said many times that the ISM Code must not be allowed to become just another paper exercise. The shipping industry has justifiably developed high expectations of the Code, and this guide, I believe, can be an important component in ensuring that it fulfils them.

**William A O'Neil**  
**Secretary General**  
**International Maritime Organisation**

### **Foreword by Michael Grey**

It would be no exaggeration to say that Michael Grey is not only one of the most famous maritime and shipping journalists in the world but probably the most highly respected. Best known for his pragmatic and incisive columns in Lloyds List he frequently puts forward a 'seafarers perspective' on many of the topical issues of the day. I therefore decided to try and solicit Michael's help and support for this 'Seafarers Guide to ISM' and am most grateful to him for his agreement to review the manuscript ahead of publication and also to provide an additional Foreword.

#### **A SEAFARERS GUIDE TO ISM - Forward by Mr. Michael Grey**

The International Safety Management Code has been closely connected with a large segment of the shipping industry for more than three years, and this year will become mandatory for that section of the world fleet not hitherto affected. Nobody who has anything to do with the operation or management of ships, ashore or afloat, is thus able to avoid its consequences.

From its inception, it has produced strong feelings. Operators and indeed seafarers aboard well run ships in meticulously operated fleets became very exercised about the concept when it was first devised. "It is all a bureaucratic plot to apportion blame" said others. Thoughtful people recognised that the ISM Code fulfilled a number of important functions, not the least of which was to 'codify' best practice and procedures, raising the game of all to the levels of the excellent. It is designed to help, to promote improvement, to reduce risk of accidents and make the operation of ships safer and by inference, more efficient.

The three years of ISM Code operation have taught the industry a good deal. The best practitioners have had their ideas of excellence reinforced; their enthusiasm for well documented procedures confirmed by a reduction of accidents and an increase in efficiency. But the ISM Code was always going to be a 'team' function, with all aboard ship or ashore involved in some participatory way.

To use a footballing analogy, the best teams function well when their members feel 'ownership' and 'involvement' with the team tactics. Ownership and involvement will have been crucial ingredients in the development of a satisfactory and dynamic ship management system. By contrast, the imposition of an external system, without involvement or consultation is unlikely to bring out the best in the players, who may well be positively hostile.

Research into the implementation of the ISM Code has reflected both poles of opinion, from those who are hugely enthusiastic about its disciplines and order. And by contrast, those who remain unconvinced that it has meant anything other than the imposition of burdensome paperwork. This guide is designed to reconcile these contrasting views and persuade the 'unbelievers' that properly implemented, by understanding owners and managers, the Code is unequivocally a force for good.

It is written in a fresh and light, if not light-hearted manner; because its authors believe that an understanding of the Code and its principles need not be more complicated than common sense. It is written for ships and seafarers, and while basketball players and cricket enthusiasts might not be entirely comfortable with references to the 'beautiful game', they cannot deny that it is an international currency.

It is written in a style that is not remotely legalistic, full of common sense, and shows the Code not as a prescriptive procedure, but something that is designed to help. To promote improvement and to help insulate against accident. Those still sceptical will hopefully be convinced by answers to the most frequently

asked questions about the ISM Code questions drawn from research, and deserving proper answers. And the third part of the guide, designed to be left lying around the messrooms, or as a crew training aid, could be the most important, in that it impresses, by means of cartoons, important messages about the fact that the ISM Code is not something best left to the senior officers, or the superintendent. It involves everyone aboard – the whole ship's team, whose individual contributions help keep hazards at bay.

**Michael Grey**

## FAQ's

Many of the misunderstandings and misconceptions that were coming to light from the survey responses seemed to be shared by different people in different parts of the world and from quite different backgrounds. I therefore took some of the most serious and frequently expressed misunderstandings and put these into either straight or rhetorical questions and provided my opinion by way of an answer. A wide range of issues are covered in the FAQ (frequently asked question) section of the Guide but two examples can be examined through the following link.

### A SEAFARERS GUIDE TO ISM - Frequently Asked Questions (FAQ's)

'A Seafarers Guide to ISM' contains a section in which 19 'frequently asked questions' or FAQ's are set out against which I express my own views by way of answers to the issues being raised. Two examples of the FAQ's are set out below to provide a flavour of the approach taken.

A. "All the ISM Code has done is to shift everything onto the ship so that we will be blamed when things go wrong. Why should we on board the ship have all the responsibility for ISM?"

*This is a fairly common misconception. The fact is that the ISM Code most certainly does not shift all the responsibility or blame onto the ship – quite the contrary! The Code is very specific in the responsibility for developing, implementing and maintaining the SMS falls very clearly upon the Company. The staff of the Company office ashore, including the DP and the seafarers of the ships operated by the Company all have their important parts to play and must accept personal responsibility for their individual participation within the SMS. This is an important factor in the development of a 'safety culture'. There is no question of a Company somehow shifting its responsibilities either onto the ship or its flag state, classification society or anyone else.*

B. "As Captain of the ship I feel that the ISM Code has taken away all my decision making powers and everything must now be done according to the procedures manuals. Shouldn't I be allowed to run my ship the way I think it should be run?"

*There are a number of issues that arise here. Firstly, it is not correct to suggest that the ISM Code has in some way removed the Masters decision making powers – quite the contrary. The Code requires the Company to make it very clear to the Master that he has overriding authority and responsibility to act in whatever way he thinks appropriate, in the circumstances, with respect to safety and pollution prevention. On occasions this may mean acting contrary to specific guidelines within the procedures manuals. The Master is the person 'on the spot' and thus in the best position to decide what the best course of action may be drawing upon his experience, knowledge and expertise. For most circumstances however the procedures manuals should reflect, in general terms, the standardised Company approach to operations – or even emergency situations – which should be familiar to all Masters within the Company. The Master has a general duty to ensure that the SMS is properly implemented on board. If there are specific aspects of the SMS which the Master, or anyone else for that matter, believes could be improved then these should be raised with the DP – possibly during a Master's Review meeting.*

Masters within the Company. The Master has a general duty to ensure that the SMS is properly implemented on board. If there are specific aspects of the SMS which the Master, or anyone else for that matter, believes could be improved then these should be raised with the DP – possibly during a Master's Review meeting.



(7) What is a DP?  
DP stands for 'Designated Person' - or sometimes described as the 'Designated Person Ashore' (DPA) - is a person appointed by the Company who provides a link or contact point within the SMS between the ship and the shore management. The DP will have direct access to the highest levels of management ashore as well as the Master onboard and in a large Company there may be more than one DP appointed to look after all the fleet.

(8) Should I know who the DP is in my Company?  
It is very important that the Master and senior officers on board know who the DP is and how to contact him. It would also be very useful and advisable for everyone else on board to know the identity of the DP - the DP should be available to consider reasonable concerns from any member of the crew regarding the SMS.

(9) I am employed through a manning agent in Manila. The ship is operated on a day-to-day basis by a ship management company in Glasgow and is on long term time charter in the liner services of a big shipping company based in Germany. I think the real 'owners' of the ship are a group of investors in Switzerland. Who is the 'Company' as far as ISM is concerned?  
The answer to this question is not always clear. The Code says that the Company is the body who has assumed responsibility for operation of the ship. In this particular case it is most likely that the ship management company in Glasgow would be the Company as far as ISM were concerned. In any event

the actual ship owner must advise the flag State of the details of the Company (if it is to be an organisation different from the actual owner. This will be the name on the Document of Compliance (DOC) issued to that Company.



(10) The Company have just a set of ISM manuals on board and say that we have to implement the Code - but the Superintendent has told us that we should not ask for anything if it will cost money. How can I possibly motivate my officers and crew on board to take this thing seriously with that sort of attitude?

For any management system to stand any chance of working successfully it must be lead from the top. The Managing Director or Chief Executive Officer of the shipping company must make a clear and unambiguous statement of support and commitment. At one level the Company should certainly set out in writing its 'Safety and Environmental Protection Policy' but on a day-to-day basis the Company should take the opportunity of reminding all involved of its commitment to safety management and pollution prevention. Once that commitment becomes clear to those ashore and onboard then motivation and encouragement in the operation of the SMS should be made a very realistic possibility. The DP should assist with ensuring that the SMS is allowed to develop in this way.



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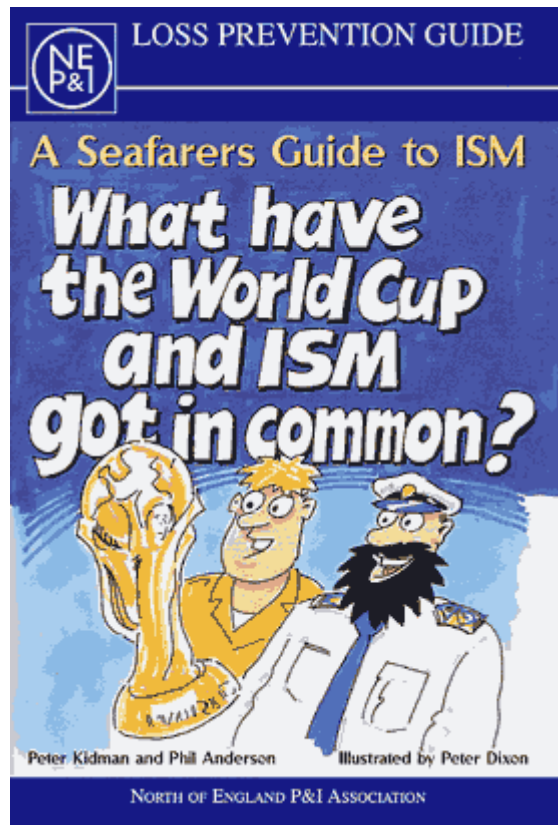
Copies of the book can be ordered from North of England P&I - [risk.management@nepia.com](mailto:risk.management@nepia.com)

### What has the World Cup and ISM got in common?

The successful implementation of the requirements of the ISM Code depends upon everyone involved working together as key players all on the same team. Only in this way can the many hazards be overcome and the risks managed for the benefit of the Company, the individuals involved and the industry as a whole. An interesting and enlightening comparison can be made with the efforts required by a football team aspiring to reach the cup final and score the winning goals.

### A SEAFARERS GUIDE TO ISM - What has the World Cup and ISM got in common?

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What have the World Cup and ISM got in common?  
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Copies of the book can be ordered from:

Anchorage Associates  
 275 St Margarets Road  
 Twickenham  
 TW1 1PN

Email: [simon@fullalove.com](mailto:simon@fullalove.com)