

# 2019 COLLECTIVE RECOMMENDATIONS

QACE 2018 ANNUAL REPORT - ANNEX C

## **1/ Focus on report sampling**

Following last year's recommendation regarding concerns over the report checking process and the accuracy of survey reports, QACE continues to highlight the issue by bringing a focus for the auditors to ensure that sufficient time is given to audit sessions to ensure an effective sample of survey and audit reports is completed. Survey and audit reports are the record of the effectiveness and completeness of the survey and are the best place to determine the overall standard of surveying and reporting. The technique is to ensure that the sampling across the ROs is consistent and leads to confirmation, over time, that the actions the ROs are taking, generally and individually, over their report checking is working. It is particularly important that sub-offices and remote surveyors' reports are sampled during regional or area Control Office audits.

## **2/ Evidence to support the downgrading of major, and deletion of ISM non-compliances**

ISM audit findings have been identified where evidence of corrective action is not available or is not considered appropriate. It is essential in ensuring the effectiveness of implementing the International Safety Management Code, with shipping companies and onboard ships, where non-conformities and especially major non-conformities are identified, that effective corrective action is evidenced and recorded before the findings are downgraded or closed. Pressure can be brought to bear where a finding delays the ship, involves a costly action or requires the implementation of improved maintenance regime.

## **3/ The effectiveness of ACB audit finding Corrective Actions**

Particularly when undertaking the audit finding trend analysis for each RO's biennial individual recommendations there are occasions where identified findings are repeat of trends, identified from previous years' trends. Just as in the case for recommendation 2, this may indicate earlier ineffective corrective actions.

Both the RO's and ACB's trend analysis should focus on these potential situations, if they exist, whether or not a review of the effectiveness of previous corrective action is required.

## **4/ The effectiveness of Fleet Monitoring and Ship Targeting.**

A new procedural requirement has been issued regarding this important risk-based control. The ROs have all had an associated process in place for several years. To be effective the criteria for targeting should be tailored to reflect the RO's fleet profile. There are different issues associated with larger, multiple ship type fleets and for smaller older ship fleets. An important element is the risk criteria that the RO applies, which should include as a minimum, ship's age, PSC performance, poorly performing flags and most important surveyor feedback

(PR17). Ineffective implementations are reactive in nature, for example, where a ship is only targeted after it has already been detained twice. One of the major benefits of an effective regime is a good PSC record. At the same time, a poor PSC record may indicate ineffective fleet monitoring. Decisions to remove a ship from targeting are to be based on data-driven evidence. Best practice includes a defined period for the ships to remain under monitoring and targeted ships subject to a minimum of two unscheduled surveys during the period. At the termination of the period the ship must evidence improved maintenance or class suspension is to be implemented. Associated QACE requirements are planned.