

# **Management System**

# **FLEET DIRECTIVE**

FD2401

17 January 2024

### **Procedures for Reporting and Handling Non-Conformities**

This Fleet Directive is issued as an interim amendment to MSMS until a new version is released. The instructions contained in this Directive are to be considered integral parts of MSMS with immediate effect and the Directive remains valid until formally withdrawn.

It has been brought to our attention that there is a gap in our procedures for the reporting and handling of ISM non-conformities. Therefore the following procedure is to be implemented:

# 1. Why Report Non-Conformities

By reporting non-conformities, you are helping keep you and your colleagues safe and ensuring the ship is compliant with relevant requirements.

Every time something happens, it is an opportunity to learn and improve. By investigating, and taking the time to understand what caused it, we can make sure that measures are put in place to try and prevent it from ever happening again.

You will never be penalised or thought badly of for reporting an non-conformity.

#### 2. What is a Non-Conformity?

A non-conformity is "an observed situation where objective evidence indicates the non-fulfilment of a specified requirement". This means that a requirement, either internal or external, is not being met.

Every non-conformity is a learning opportunity.

#### 3. Which non-conformities must be reported?

All non-conformities must be reported. If you aren't sure if what you have seen is a non-conformity, report it anyway.

#### 4. How are Non-Conformities reported?

Any member of the ships crew or Company shore team who witnesses or is informed of an non-conformity is required to make a report. There are two ways to report a non-conformity:

#### **SMMS Report**

The preferred method is to make a formal report in SMMS. This ensures that all required information is completed and that the report is sent to the Company for review and action.

Whenever a report is made in SMMS, the Master is to be informed.

Whenever the Master is informed or makes a report in SMMS, he is to inform the Company.

#### Paper Report

If for whatever reason, an SMMS report is not possible, the paper form S10 Initial Report is to be completed and handed to the Master. The Master must pass the form to the Company and also make a report in SMMS.

## 5. How are Non-Conformities Handled Once Reported?

Once the Company receives a report of an non-conformity, the Managing Director will be informed, and the shore team will review the event either at their next daily call, or if the Managing Director decides it is necessary, at an urgent meeting.

The Company will decide the level of investigation required for any non-conformity, however every event will be investigated and actions defined and implemented.

Any non-conformity that results in an Non-conformity is classified as a Major Event and must always result in a physical attendance at the ship by a member of the shore team as soon as possible.

The outcome of the investigation is to be recorded in writing and filed in SMMS.

All agreed corrective and preventative actions must be recorded and must have a target date for implementation. In general, the target should not exceed one month, however with the approval of the Managing Director this may be extended to three months.

Once actions have been implemented, this must be confirmed in SMMS.

The shore team will confirm the implementation of the actions at their next attendance at the vessel. In the case of Major Events, the Company is to confirm implementation as soon as possible after the vessel informs them that the actions have been implemented.

#### 6. What are Corrective and Preventative Actions?

Corrective actions are actions which rectify the immediate problem or issue (sometimes called the "proximate cause") that either caused or resulted from the non-conformity. A corrective action returns the situation to "normal", but does not necessarily mean that the non-conformity will not happen again. An example of this could be, if a mooring line breaks and hurts someone, replacing the mooring line with a new one.

Preventative actions are those which are targeted at the underlying reason for the non-conformity (sometimes called the "Root Cause"), and which are designed to make sure it cannot happen again. An example of this could be, using the mooring line situation above, increasing inspection of mooring line condition, making sure all crew know the risks of mooring lines, marking danger zones on deck, ensuring all mooring equipment is in good working order.

Identifying Preventative Actions is critical to any investigation, and ensuring they are implemented correctly is essential to ensure future harm is avoided. Preventative Actions can only be identified if the Root Cause (or causes) of an Event has been identified.

#### 7. Who Else Needs to be Informed of Non-Conformities?

In some cases, organisations outside the Company must be informed when a non-conformity takes place. It is important that all required parties are informed proactively, as there can be serious consequences for failing to report in good time.

The Company is to assess who needs to be informed once they receive a report of an non-conformity and will advise the Master of any action they need to take.

This Fleet Directive takes effect immediately.

Please ensure this directive is shared widely, and all take the time to become familiar with the above change(s). All Officers must initial the box below to confirm they have read and understood this Directive.

Ian McIntosh-Oakley Managing Director Valid without signature

Confirmation of receipt and understanding:

	Master	Ch. Off.	OOW D	OOW D	Ch. Eng.	2. Eng.	OOW E	OOW E	ETO
Initial									
Name									
Date									