



**Gibraltar Maritime
Administration**

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Shipping Information Notice – 075

***COVID-19 - Temporary acceptance of alternative procedures
ISM Code Section 12.1 – Internal Safety Audits***

To: Ship owners, Operators, Managers, DPA's

The purpose of this Shipping Information Notice (SIN), is to provide details of temporary accepted procedures by the Administration in relation to internal safety audits as required by the ISM Code, Section 12.1, due to current COVID-19 restrictions.

Due to difficulties in obtaining access to company managed ships as a result of travel and access restrictions imposed by Countries, the Administration recommends and accepts the following temporary measures for undertaking internal safety audits:

- a) In the first instance, ISM companies should avail themselves of the provisions for the extension of internal safety audits provided within the ISM Code, Section 12.1, whereby audits may under exceptional circumstances be extended past the 12 month interval for a further maximum period of 3 months.

Should continued restrictions impede the undertaking of the required internal safety audits within the above-mentioned permissible period of extension, the following recommended temporary procedures should be developed and implemented by ISM managers. These recommended procedures are dependent on the technical capabilities available to companies, i.e. the availability of methods such as remote web based access to the ship.

- a) For those companies equipped with remote web-based connections to the ship, remote internal safety audits may be undertaken by suitably qualified company personnel and will be accepted as a suitable temporary measure by the Administration, provided these temporary procedures are sufficiently effective to verify compliance with the requirements of the ISM Code.
- b) For those companies without remote capabilities, the use of ship's personnel for the undertaking of internal safety audits, employing a cross-departmental methodology, will be accepted by the Administration. Temporary procedures should be developed and implemented by ISM companies ensuring the necessary instruction and guidance are provided to the appointed internal auditor(s).

Internal auditors should preferably possess accredited ISM internal auditor certification. In the absence of afore-mentioned certified personnel, person(s) deemed by the ISM company as sufficiently experienced and knowledgeable of the area(s) due to be audited should be appointed.

In both cases, access to records of ISM related activities in way of documentation, whether paper-based and/or electronic demonstrating compliance with the ISM Code requirements, shall be made available to the internal auditor for review. Methods for recording (but not limited to) the scope, sampling process, interviews of relevant personnel, and details of any non-conformities or observations raised during the internal safety audits, shall be included in any temporary procedure developed and implemented.

Given certain the physical limitations within the above recommended temporary measures, these should be followed by a physical attendance audit at the first available opportunity by appropriately qualified company personnel.

Steve Gomez
Chief Surveyor (Ag)

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