

# Isle of Man Ship Registry Manx Shipping Notice



## **IoM Regulations implementing the STCW Convention**

Ref. MSN 050  
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### **Introduction**

The STCW Convention establishes basic requirements on training, certification and watchkeeping for seafarers on an international level. A comprehensive review of the STCW Convention (known as the Manila Amendments) adopted a significant number of amendments including new requirements for: training and certification, hours of work and rest, prevention of drug and alcohol abuse and medical fitness standards for seafarers. Since the Manila Amendments further amendments to STCW relating to the Polar Code, passenger ship training and ships subject to the IGF Code have entered into force.

### **Application**

The STCW Convention has been extended to the Isle of Man and is given effect in Manx law by the Merchant Shipping (Manning & STCW) Regulations 2014 (the Regulations). These Regulations apply the STCW Convention, including its Annex and the STCW Code up to and including the latest amendment to the STCW Convention which is IMO Resolution MSC.416(97) adopted on 25 November 2016 which came into force on 1 July 2018

The Regulations apply to all seafarers working on Isle of Man registered commercial ships and it is the responsibility of the ship's Company to ensure the requirements are being met.

Section 13 of this MSN states the requirements for seafarers working on a foreign commercial ship visiting an Isle of Man port.

The following sections of the STCW Convention have already been implemented by the Merchant Shipping (Maritime Labour Convention) Regulations and are not included in the Isle of Man Merchant Shipping (Manning and STCW) Regulations:

- STCW Regulation VIII/1.2, Fitness for duty (Hours of work and rest); and
- STCW Regulation I/9, Medical standards.

### **1. Isle of Man endorsement requirements**

Regulation I/10 of the STCW Convention requires a Certificate of Competency (CoC) issued by another Party to an officer or radio operator to be recognised by the Ship Registry. This is not required if the seafarer holds a CoC issued by the UK's Maritime & Coastguard Agency. The Isle of Man recognises the CoCs of a number of countries and this list of recognised countries is stated on the Ship Registry website. The seafarer's certification is inspected by the endorsement team at the Ship Registry and, if found satisfactory, an Isle of Man endorsement recognising the seafarer's CoC is issued.

Further information on the Isle of Man endorsement application process is available in MSN 051.



The Ship Registry no longer issues navigational and engineering watch rating certificates. Seafarers who require these certificates will have to contact their national issuing authority which can be any country that is a signatory to the STCW Convention.

## **2. Responsibility of the master and the ship's Company**

The ship's Company is responsible for the assignment of seafarers for service on their ships in accordance with the provisions of the STCW Convention.

*"Company" in relation to a ship means the owner of the ship, or any other organisation or person such as the manager, or the bareboat charterer, who has assumed responsibility for operation of the ship from the shipowner and who, on assuming such responsibility, has agreed to take over the duties and responsibilities imposed on the Company by the SOLAS Convention and the STCW Convention.*

The master and Company must ensure that –

- a. each seafarer assigned to any Isle of Man registered ship holds an appropriate certificate in accordance with the provisions of the STCW Convention; and
- b. their ships are manned in compliance with the applicable safe manning requirements (further information is stated in MSN 052).

In addition the Company must ensure that -

- a. seafarers assigned to any of their ships have received refresher and updating training as required by the STCW Convention;
- b. documentation and data relevant to all seafarers employed on their ships are to be maintained and readily accessible at the Company's office (this can be accessed electronically if the manning is arranged through a third party). This shall include documentation and data relating to the seafarer's –
  - i. experience;
  - ii. training;
  - iii. medical fitness; and
  - iv. competency in assigned duties;
- c. written instructions are issued to the master regarding setting out the policies and procedures to be followed to ensure that seafarers, on being assigned to any of the Company's ships, are familiarised with the shipboard equipment, operating procedures and other arrangements needed for their specific duties. The policies and procedures shall include an allocation of a reasonable period of time during which each seafarer will have an opportunity to become acquainted with –
  - i. the specific equipment they will be using; and
  - ii. ship-specific watchkeeping safety, environmental protection, security and emergency procedures and arrangements the seafarer needs to know to perform the assigned duties properly;
- d. the ship's complement can effectively coordinate their activities in an emergency situation and in performing functions vital to safety, security and to the prevention or mitigation of pollution; and
- e. at all times on board their ships there shall be effective oral communication in accordance with chapter V, regulation 14, paragraphs 3 and 4 of the



International Convention for the Safety of Life at Sea, 1974 (SOLAS), as amended.

### 3. Dispensations

The Ship Registry may issue a dispensation permitting a specified seafarer to serve on a ship for a specified period not exceeding 6 months. This will only be issued under the circumstances stated in Article 8 of the STCW Convention. Any requests for a dispensation must be made to [marine.survey@gov.im](mailto:marine.survey@gov.im)

### 4. STCW Convention Chapter II Deck department

All members of the deck department must hold STCW certification relevant to their position on board the ship on which they are serving in accordance with Table 2 below.

<b>Table 2 – Deck department</b>			
<b>Capacity</b>	<b>Area limit</b>	<b>Tonnage</b>	<b>STCW Regulation</b>
Master	near-coastal none none	<500 ≥500 up to 3,000 ≥3000	II/3 II/2 II/2
Chief Mate	none none	≥500 up to 3,000 ≥3,000	II/2 II/2
Officer in charge of a navigational watch	near-coastal none none	<500 <500 ≥500	II/3 II/3 II/1
Rating serving as able seafarer deck	none	≥500	II/5
Rating forming part of a navigational watch	none	≥500	II/4



## 5. STCW Convention Chapter III Engine Department

All members of the engine department must hold STCW certification relevant to their position on board the ship they are serving on in accordance with Table 3 below

<b>Table 3 – Engine department</b>		
<b>Capacity</b>	<b>Main propulsion power (kW)</b>	<b>STCW Regulation</b>
Chief Engineer	≥750 up to 3,000 ≥3,000	Reg. III/3 Reg. III/2
Second Engineer	≥750 up to 3,000 ≥3,000	Reg. III/3 Reg. III/2
Officer in charge of an engineering watch in a manned engine-room or designated duty engineer in a periodically unmanned engine-room	≥750	Reg. III/1
Rating forming part of an engine-room watch or designated to perform duties in a periodically unmanned engine-room	≥750	Reg. III/4
Ratings serving as able seafarer engine in a manned engine-room or designated to perform duties in a periodically unmanned engine-room	≥750	Reg. III/5
Electro-technical officer	≥750	Reg. III/6
Electro-technical rating	≥750	Reg. III/7



## **6. STCW Convention Chapter IV Radiocommunication and radio operators**

Every person in charge of or performing radio duties on a ship required to comply with the GMDSS requirements (commercial ships of  $\geq 300\text{GT}$ ) shall hold a GMDSS operator's certificate issued in accordance with STCW Reg. IV/2.1

All persons performing radio duties shall be qualified as follows –

- a. ships operating in the A1 sea areas a GMDSS restricted operator's certificate is required; and
- b. ships operating in the A2, A3 and A4 sea areas a GMDSS general operator's certificate is required.

## **7. Certificates of Proficiency**

The Regulations require that a seafarer assigned to a ship must hold a certificate of proficiency in accordance with the provisions of the STCW Convention.

A certificate of proficiency is defined in STCW as –

*'a certificate other than a Certificate of Competency issued to a seafarer, stating that the relevant requirements of training, competencies or seagoing service in the Convention have been met'.*

## **8. STCW Convention Chapter V - Special training requirements for personnel on certain types of ships**

The National Administration will either issue a certificate of proficiency for oil, chemical and liquefied gas tankers or endorse the seafarers existing certificate of competency. In either case the National Administration must be a country on the Isle of Man list of recognised countries as stated in MSN 051.

### **a) Oil and chemical tanker training and qualifications (STCW Reg. V/1-1)**

a) Basic training for oil and chemical tanker cargo operations:

Officers and ratings assigned specific duties and responsibilities related to cargo or cargo equipment on oil or chemical tankers shall hold a certificate in basic training for oil and chemical tanker cargo operations.

b) Advanced training for oil tanker cargo operations:

A certificate in advanced training for oil tanker cargo operations or for chemical tankers must be held by masters, chief engineer officers, chief mates, second engineer officers and any person with immediate responsibility for the following –

- a. loading;
- b. discharging;
- c. care in transit;
- d. handling of cargo;
- e. tank cleaning; or
- f. other cargo-related operations on oil/chemical tankers.

### **b) Liquefied gas tankers (STCW Reg. V/1-2)**

a) Basic training for liquefied gas tanker cargo operations:

Officers and ratings assigned specific duties and responsibilities related to cargo or cargo equipment on liquefied gas tankers shall hold a certificate in basic training for liquefied gas tanker operations.



- b) Advanced training for liquefied gas tanker cargo operations:  
A certificate in advanced training for liquefied gas tanker cargo operations must be held by masters, chief engineer officers, chief mates, second engineer officers and any person with immediate responsibility for the following –
- a. loading;
  - b. discharging;
  - c. care in transit;
  - d. handling of cargo;
  - e. tank cleaning; or
  - f. other cargo-related operations on liquefied gas tankers.

**c) Passenger ships (STCW Reg. V/2)**

Additional training is required for personnel serving on passenger ships. The additional training can be arranged on board by the ship's company as long as the training has been approved by the Ship Registry, the MCA or another National Administration. Evidence must be maintained onboard confirming the training system has been approved.

The passenger ship training and qualifications is in 4 elements and must have been completed by the seafarer prior to being assigned shipboard duties –

a) Safety training (STCW Reg. V/2.6)

This training is for personnel providing direct service to passengers in passenger spaces, and includes training in communication and demonstrating life-saving appliances. The training is specified in section A-V/2, paragraph 2 of the STCW Code.

b) Crowd management (STCW Reg. V/2.7)

This is required for the master, officers, ratings qualified in accordance with chapters II, III and VII and every other person designated on the muster list to assist passengers in emergency situations. The training is specified in section A-V/2, paragraph 3 of the STCW Code.

c) Crisis management and human behaviour training (STCW Reg. V/2.8)

This training is required by the master, chief engineer officers, chief mates, second engineer officers and any person having responsibility for the safety of passengers in emergency situations. The training is specified in section A/2, paragraph 4 of the STCW Code.

d) Passenger safety, cargo safety and hull integrity training (STCW Reg. V/2.9)

This training is for masters, chief engineer officers, chief mates, second engineer officers and any other crew members with immediate responsibility for the safety of passengers in emergency situations embarking and disembarking passengers, loading, discharging or securing cargo, or closing hull openings. The training is specified in section A-V/2, paragraph 5 of the STCW Code.

Documentary evidence must be available that the training stated above has been completed.

For the training stated in b), c) & d) (above), refresher training must be carried out or evidence must be available that the seafarer has achieved the required standard of competence within the previous 5 years.



#### **d) Ships operating in polar waters (STCW Reg. V/4)**

There are two training requirements for ships operating in polar waters. This is stated in the Polar Code and the training is stated in Reg. V/4 of the STCW Convention.

##### a) Basic training for ships operating in polar waters

Masters, chief mates and officers in charge of a navigational watch on ships operating in polar waters must hold a certificate in basic training for ships operating in polar waters. This is required by the Polar Code and the basic training requirements is stated in Section A-V/4 paragraph 1 of the STCW Code.

##### b) Advanced training for ships operating in polar waters

Masters and chief mates on ships operating in polar waters, must also hold a certificate in advanced training for ships operating in polar waters. This is also required by the Polar Code. All candidates for this training must:

- i. Meet the basic training for ships operating in polar waters;
- ii. Have a least two months of approved seagoing service in the deck department, at management level or while performing watchkeeping duties at the operational level, within polar waters or other equivalent approved seagoing service; and
- iii. Have completed approved advanced training for ships operating in polar waters and meet the standard of competence specified in Section A-V/4, paragraph 2 of the STCW Code.

*Polar Code means the International Code for ships operating in Polar waters as defined in SOLAS regulation XIV/1.1*

*Polar waters means Arctic waters and/or the Antarctic area, as defined in SOLAS regulations XIV/1.2 to XIV/1.4.*

#### **e) Ships subject to the IGF Code (STCW Reg V/3)**

Please be aware the full list of the requirements for ships subject to the IGF Code is stated in Regulation V/3 of the STCW Convention.

##### a) Familiarization training

All seafarers serving on board ships subject to the IGF Code shall, prior to being assigned shipboard duties, receive appropriate ship and equipment specific familiarization as specified in Reg. I/14, paragraph 1.5 of the STCW Convention.

##### b) Basic training

Seafarers responsible for designated safety duties associated with the care, use or in emergency response to the fuel on board ships subject to the IGF Code shall hold a certificate in basic training for service on ships subject to the IGF Code. The provisions for this training are stated in section A-V/3 paragraph 1 of the STCW Code.

##### c) Advanced training

Masters, engineer officers and all personnel with immediate responsibility for the care and use of fuels and fuel systems on ships subject to the IGF Code shall hold a certificate in advanced training for service on ships subject to Reg V/3.8 of the STCW Convention.

##### d) Refresher training

Seafarers holding certificates of proficiency for basic and advanced training for service on ships subject to the IGF Code, shall, at intervals not exceeding 5 years, undertake refresher training or be required to provide evidence of having achieved the required standard of competence within the previous 5 years.





## **9. STCW Convention Chapter VI, emergency, occupational safety, security, medical care and survival functions**

### **a) Safety familiarisation training (STCW reg. VI/1)**

All persons employed or engaged on a ship must receive approved safety familiarisation training in personal survival techniques before being assigned any shipboard duties. This training applies to all seafarers including contractors but does not apply to passengers. This training will normally be conducted by the ship's safety officer although it will be for each Company to determine the system to be used in each ship. The familiarisation training should be clearly stated in the vessel's safety management system and must be readily accessible for inspection by a port or flag State inspector in order to verify compliance with STCW reg.VI/1.

The extent of familiarisation training must ensure that each person is able to -

1. communicate with other persons on board on elementary safety matters and understand safety information symbols, signs and alarm signals;
2. know what to do if -
  - a. a person falls overboard;
  - b. fire or smoke is detected; or
  - c. the fire or abandon ship alarm is sounded;
3. identify muster and embarkation stations and emergency escape routes;
4. locate and don lifejackets;
5. raise the alarm and have basic knowledge of the use of portable fire extinguishers;
6. take immediate action upon encountering an accident or other medical emergency before seeking further medical assistance on board; and
7. close and open the fire, weather-tight and watertight doors fitted in the particular ship other than those for hull openings.

### **b) Basic training (STCW Reg. VI/1)**

The STCW Convention requires that all seafarers engaged in any capacity on board the ship on the business of the ship as part of the ship's complement with designated safety or pollution prevention duties in the operation of the ship shall, before being assigned to any shipboard duties, received appropriate approved basic training or instruction in -

1. personal survival techniques (STCW A-VI/1.2.1.1);
2. fire prevention and fire-fighting (STCW A-VI/1.2.1.2);
3. elementary first aid (STCW A-VI/1.2.1.3); and
4. personal safety and social responsibilities (STCW A-VI/1.2.1.4).

The Ship Registry considers this to apply to all persons stated on the minimum safe manning document and includes catering staff, cadets and trainees. Supernumerary personnel, spouses and contractors are not required to undertake this training.

For passenger ships this training is required for all crew with designated duties and who are listed as "additional personnel" on the Minimum Safe Manning Document.

### **c) Refresher training**

The Manila Amendments introduce the requirement for refresher training and on or after 01/01/2017 all seafarers will be required to provide evidence every 5 years of maintaining





the required standard of competence for the training listed below. The Ship Registry considers this to mean that either the full course has been completed within the previous 5 years or if that was completed more than 5 years ago, the relevant refresher training must have been completed within the previous 5 years. The refresher training must be carried out to the satisfaction of an STCW issuing Certificate of Proficiency Authority and may include additional shore-side training or evidence of relevant sea service.

This new requirement for refresher training applies to the following –

1. personal survival techniques (STCW A-VI.2.1.1);
2. fire prevention & fire-fighting (STCW A-VI.2.1.2);
3. survival craft and rescue boats other than fast rescue boats (STCW A-VI/2.1);
4. fast rescue boats (STCW A-VI/2.7); and
5. advanced fire-fighting (STCW A-VI/3).

**d) Certificates of proficiency in survival craft and rescue boats other than fast rescue boats (STCW Reg. VI/2.1)**

The Isle of Man Merchant Shipping (Life-Saving Appliances) Regulations require a deck officer or a certificated person to be in charge of each survival craft. In the case of lifeboats a second in command shall also be nominated.

The Isle of Man Merchant Shipping (Manning and Training) Regulations require every Manx passenger ship must carry the number of certificated persons specified in Table 5.

<b>Table 5 Passenger ships STCW Reg. VI/2.1 requirements</b>	
<b>Means of evacuation</b>	<b>Number of certificated persons</b>
For every lifeboat boarded at the stowed position and capable of release and lowering from inside the boat	2 per lifeboat
For every lifeboat boarded at the stowed position and capable of being lowered from inside the boat after release externally	2 per lifeboat, plus 1 additional person for every 2 boats
For every lifeboat both released and lowered from the ship	3 per lifeboat
For each davit launched liferaft	1 per liferaft plus 1 additional person for each davit
For each Marine Escape System	4 per system plus 1 additional person for each raft associated with the system.

“certificated person” means a member of the crew who holds a certificate of proficiency in survival craft and rescue boats (other than fast rescue boats) issued in accordance with the STCW regulation VI/2.1.



**e) Proficiency in fast rescue boats (STCW Reg. VI/2.2)**

The Isle of Man Merchant Shipping (Life-Saving Appliance) Regulations require fast rescue boats on passenger ships shall have at least two crews each with a minimum of two persons who shall be trained in accordance with STCW Reg. VI/2.2.

**f) Minimum requirements for training in advanced fire-fighting (STCW Reg. VI/3)**

All seafarers designated to control fire-fighting operations shall have successfully completed advanced training in techniques for fighting fire with particular emphasis on organization, tactics and command. This training shall be carried out in accordance with the provisions of STCW. Reg VI/3.

**g) Minimum requirements relating to medical first aid and medical care (STCW Reg. VI/4)**

The requirements for medical care on board ships are stated in the Merchant Shipping (Maritime Labour Convention) Regulations. Further information is available in MLN 4.1.

**h) Ship Security Officer 'certificate of proficiency' (STCW Reg. VI/5)**

All commercial vessels of 500GT and over must have a person designated as the Ship Security Officer in accordance with the ISPS Code. The Ship Security Officer must be issued with a certificate of proficiency in accordance with STCW Reg. VI/5 and A-VI/5 of the STCW Code.

**i) Security-related training and instruction for all seafarers (STCW Reg. VI/6)**

Security training is required for seafarers serving on ships required to comply with the provisions of the ISPS Code (all commercially operated ships of 500GT and over).

i. Security awareness training

This training is for seafarers employed or engaged in any capacity on the business of a ship as part of the ship's complement without designated security duties. The Ship Registry considers this to apply as a minimum to all members of the deck, engine-room and catering departments.

ii. Seafarers with designated security duties training

This training applies to every seafarer who is designated to perform security duties as stated in the Ship Security Plan and also includes anti-piracy and anti-armed robbery related activities. Seafarers who commenced sea service before 01/01/2012 are not required to undertake further training provided they could demonstrate the following:

- a) They have approved seagoing service as shipboard personnel for a period of at least six months in total prior to 01/01/2012. The seafarer must have evidence of this, in most cases the seafarer was issued with a certificate from their employer confirming the seafarer had the necessary sea time; or
- b) Having performed security functions after 01/07/04 considered to be equivalent to the seagoing service required by a); or
- c) Passing an approved test (see section 6 Training Centres); or
- d) Successfully completing approved training

iii. Training centres – security training

The following training centres are acceptable for security training:



- a) A training centre can be a shore based establishment or a shipping company;
- b) The following types of training is allowed: classroom instruction, in-service training, distance learning, computer-based training or a combination of these methods; and
- c) The IoM Ship Registry will verify training centres located on the Isle of Man to ensure they meet the requirements for STCW Regulation VI/6.

## 10. Requirements for the prevention of drug and alcohol abuse

The Manila Amendments introduce a new requirement for adequate measures to be established for the purpose of preventing drug and alcohol abuse on board ships.

The maximum limits stated in the table below will apply to masters, officers and other seafarers while performing designated safety, security and marine environmental duties.

<b>Table 6 Alcohol limits</b>		
<b>Alcohol Limit</b>	<b>STCW Section A-VIII/1.10</b>	
In the blood	0.05% blood alcohol content	50mg of alcohol in 100ml
In the breath	0.25mg/l	25microgrammes of alcohol in 100ml

The ship's Company is required to have a clearly written policy of drug and alcohol abuse prevention. This must be available to all seafarers and will include procedures to ensure seafarers on their vessels do not exceed the limits stated in Table 6 while they are performing watchkeeping duties or duties that involve designated safety, prevention of pollution or security duties.

## 11. Watchkeeping arrangements

The master and Company must ensure that watchkeeping arrangements are adequate for maintaining a safe watch or watches, taking into account the prevailing circumstances and conditions and that, under the master's general direction –

- a. officers in charge of the navigational watch are responsible for navigating the ship safely during their periods of duty, when they must be physically present on the bridge or in a directly associated location such as the chartroom or bridge control room at all times;
- b. radio operators are responsible for maintaining a continuous radio watch on appropriate frequencies during their periods of duty;
- c. officers in charge of an engineering watch, as defined in the STCW Code, under the direction of the chief engineer, must be immediately available and on call to attend the machinery spaces and, when required, must be physically present in the machinery space during their periods of responsibilities;
- d. an appropriate and effective watch or watches are maintained for the purpose of safety at all times, while the ship is at anchor or moored and, if the ship is carrying hazardous cargo, the organisation of such watch or watches takes full account of the nature, quantity, packing and stowage of the hazardous cargo and of any special conditions prevailing on board, afloat or ashore; and



- e. an appropriate and effective watch or watches are maintained for the purpose of security.

## **12. Original certification**

In accordance with STCW regulation I/2, paragraph 11 any certificate required by the STCW Convention must be kept available in its original form onboard the ship on which the holder is serving.

## **13. Port State control**

Foreign (non-Isle of Man registered) commercial vessels visiting an Isle of Man port may be subject to a port State control inspection by an Isle of Man inspector. The STCW aspect of this inspection will be limited to verifying that all seafarers serving on board who are required to be certificated in accordance with STCW hold -

- a. an appropriate certificate; or
- b. a valid dispensation; or
- c. documentary proof that an application for an endorsement has been submitted to their national Administration.

The inspector may require an assessment (in accordance with section A-I/4 of the STCW Code) of the ability of the seafarers to maintain watchkeeping and security standards. This will only be required if the inspector has clear grounds for believing that such standards are not being maintained because any of the following have occurred –

- a. the ship has been involved in a collision, grounding or stranding; or
- b. there has been a discharge of substances from the ship when under way, at anchor or at berth which is illegal under any international Convention; or
- c. the ship has been manoeuvred in an erratic or unsafe manner whereby routeing measures adopted by the International Maritime Organisation or safe navigation practices and procedures have not been followed; or
- d. the ship is otherwise being operated in such a manner as to pose a danger to persons, property, the environment, or a compromise to security.

Deficiencies which may be deemed to pose a danger to persons, property or the environment include the following –

- a. failure of seafarers to hold a certificate, to have an appropriate certificate, to have a valid dispensation or to provide documentary proof that an application for an endorsement has been submitted;
- b. failure of navigational or engineering watch arrangements to conform to the requirements specified for the ship by the Administration;
- c. absence in a watch of a person qualified to operate equipment essential to safe navigation, safety radiocommunications or the prevention of marine pollution; and
- d. inability to provide, for the first watch at the commencement of a voyage and for subsequent relieving watches, persons who are sufficiently rested and otherwise fit for duty.



Failure to correct any of the deficiencies stated above are the only grounds on which a vessel may be detained.

**Reference Material:**

**Documents referred to in this MSN:**

International Convention on Standards of Training, Certification and Watchkeeping for Seafarers, as amended (STCW Convention);

Seafarers' Training, Certification and Watchkeeping Code, as amended (STCW Code);

Merchant Shipping (Manning and STCW) Regulations 2014 (SD 2014/0238);

Merchant Shipping (Maritime Labour Convention) Regulations 2013 (SD 0234/13);

MLN 4.1 Medical care on board ship and ashore;

MSN 051 Isle of Man Endorsement Application Process;

MSN 052 Minimum Safe Manning Requirements.

Most Regulations and notices are available on the Isle of Man Government website: [www.iomshipregistry.com](http://www.iomshipregistry.com) or by contacting [marine.survey@gov.im](mailto:marine.survey@gov.im)

*Please note - The Isle of Man Ship Registry cannot give legal advice. Where this document provides guidance on the law it should not be regarded as definitive. The way the law applies to any particular case can vary according to circumstances - for example, from ship to ship. You should consider seeking independent legal advice if you are unsure of your own legal position.*

