



Hamble Harbour Authority

Port Marine Safety

Code Audit

14th November 2016

Author:	ARL	Checked by:	-	Authorised by:	-
Date:	29/11/16	Date:		Date:	

Introduction

As part of their contract with Hampshire County Council as Designated Person for Hamble Harbour Authority (HHA), Regs4ships provides audit and consultancy services to the Harbour Master, Jason Scott, so as to support his duties as pertaining to the requirements of the Port Marine Safety Code ('the Code') and through this, provide continued assurance to the Harbour Board that the SMS continues to be fit for purpose.

In this visit we examined the much revised and streamlined SMS to assess its suitability as a vehicle for fulfilling the functional requirements of the Code:-

SMS Structure

Previously bound across some 14 volumes, since the last audit the SMS has been significantly restructured and condensed into 5 volumes. It is understood and accepted that some of the points raised below are likely to be found as 'work in progress':-

1. Policy Documents

Duty Holder's Letters of Responsibility

These now reflect the full membership of the Board, however, some are now more than three years old.

Recommendation 1: Duty Holders' Letters of Responsibility should be updated every three years.

Strategic Plan

A document laying out the roadway for the next ten years and informs decision making by the Harbour Board - reviewed annually.

Strategic Vision

Supports the Strategic Plan, which is a statement of shared values between stakeholders. It is amended on a 'regular basis'.

Business Plan

A document which identifies budgetary needs and demands in the short term. Reviewed annually.

Recommendation 2: The Business Plan currently published on the HHA website is the 2015 version, to wit, the plan appears to be out of date.

Safety Policy for Marine Operations

Dated July 2009, the document is out of date. It is recommended that the document is reviewed.

Marine Operations Training Policy

Dated June 2016, the Policy directly references provisions of the Code and is fit for purpose.

Enforcement Policy

Dated June 2016, the Policy also references the Code and is fit for purpose.

Mission Statement

Dated March 2011, the document is by its own volition out of date. It is recommended that this document be reviewed and the cycle of review mentioned in the penultimate sentence be set at three yearly intervals in line with Policy documents as required by the Code.

Recommendation 3: Review outdated Policy documents and, where appropriate, set the review cycle of Policies to reflect the triennial round.

Operational Responsibilities (in edit)

To be updated to reflect current personalia and roles within the Harbour Authority

Recommendation 4: Operational Responsibilities should be updated to reflect the staffing and roles of the Harbour Authority.

It is important that the Authority sets (and maintains) achievable goals with respect to the cadence of plan review and remains aware of the requirements of the Code with respect to this. The Code requires a three-yearly review cycle.

Part of this review is the adoption of operational performance indicators, of which these audits are part.

2. Harbour Authority Risk Assessments

Reviewed annually and on an ad-hoc basis as required by the SMS. Those methodologies discussed in previous audits are now being used.

3. Standard Operating Procedures (SOPs)

The HM and his Staff continue to review and update these. Quarterly Safety and Operational meetings provide an underlying mechanism by which SOPs (and their associated risk assessments) are reviewed, whether by operational need or where driven for example by reported incidents.

4. Records of Inspection and Servicing (both water and land-based assets)

Where these records identify high-capital value assets, this should follow a risk-based 'life-span' methodology which in turn will inform future budgetary requirements in the Strategic Plan and Business Plan.

5. Event/Club Risk Assessments

Contains Risk Assessments for individual events as well as standing Codes of Conduct for local clubs.

Summary of Recommendations

11/16 Recommendation 1: Duty Holders' letters of Responsibility should be updated every three years in line with the PMSC requirement.

11/16 Recommendation 2: The Business Plan currently published on the HHA website is the 2015 version, to wit, the plan appears to be out of date.

11/16 Recommendation 3: Review outdated Policy documents and, where appropriate, set the review cycle of Policies to reflect the triennial round.

11/16 Recommendation 4: Operational Responsibilities should be updated to reflect the staffing and roles of the Harbour Authority.

Closure of Recommendations from previous audit 10/15

Recommendation 1:

Update the Duty Holder Responsibility Letters to include individual and collective accountability.

Closed. (The signed Chairman's letter remains to be filed.)

Recommendation 2:

Formally set the Strategic Vision Plan review cycle at three years as the vehicle against which to report the Duty Holder's performance against the Code.

Closed. The Strategic Vision Plan now has a 3-yearly review cycle.

Recommendation 3:

Risk Assessment review and Safety Meetings (See Section 7, Recommendation 4)

Closed. (See Recommendation 4 below)

Recommendation 4:

Review the process surrounding incorporation of lessons learned from Accidents and Incidents into the SMS by way of Risk Assessment and Safety Meetings so as to produce a seamless 'closed loop' reporting system.

Closed. The 'closed loop' concept discussed at the previous audit has been fully integrated into the SMS. Risk Assessments were evidenced to have been reviewed at least annually and as required to by supporting processes.

Recommendation 5:

Produce a Skills and Training Matrix for employees and contractors.

Ongoing.

Recommendation 6:

Create a Risk Assessment for provision and suitability of A to N.

Closed. The Risk Assessment exists.

Recommendation 7:

Generate a SOP which manages reporting of vessel deficiencies to the MCA.

Closed (Ongoing). The SOP exists, however, it should reference those circumstances under which such reports should be made (we also discussed criteria under which reportable accidents are handled – these should be similarly referenced.)

Recommendation 8:

Establish a Risk Assessment to determine the scope and frequency of hydrographic surveys required.

Ongoing. This is now subject of a SOP. The SOP needs additionally to address the periodicity of surveys, if only to identify that a particular survey area is stable and not requiring so frequent monitoring.

Recommendation 9:

Reference the Hydrographic Code of Practice in the SMS.

Closed. This is now embodied in the SOPs.

Recurring Statements

Last letter of compliance to MCA:-	21 st Jan 2015 (3 years)
Last tier 2 oil spill response exercise:-	13 th Oct 2016 (3 years)
Latest published Safety Plan:-	Jan 2015 (3 years)

Conclusion

The much-streamlined SMS is greatly improved, not least in having become a much more wieldy document, now being only a handful of volumes.

We identified in the last audit that the task at hand would be to refine and ‘tune’ rather than to go ‘back to basics’, of which there is ample evidence that this has been successfully done. As a ‘living document’ the SMS develops and improves on a continual basis – only by this method can it be considered ‘fit for purpose.’

The SMS continues to be an effective tool for Safety Management and the Harbour Authority remains thereby compliant with the requirements of the Port Marine Safety Code.

With thanks to the Harbour Master and his staff for their candid assistance.

Respectfully submitted,

A handwritten signature in black ink, appearing to read 'Andy Langford', with a stylized, sweeping flourish at the end.

Andy Langford
Senior Surveyor
For and on behalf of Regs4ships Ltd

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