

PEEL PORTS GROUP

Port Marine Safety Code

Marine Safety Management system

Volume 1 - Policy

Volume 1 to be read in conjunction with the port or terminal specific MSMS volume 2 and relevant Volume 3 Documents

(published separately)



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Glossary of Terms

ALARP	As Low As Reasonably Practicable	OPRC	Oil Pollution Response Convention
ASMAT	Annual Safety Management Awareness and Training	STCW95	Standards of Training, Certification and Watchkeeping
CEO	Chief Executive Officer	PEC	Pilot Exemption Certificate
COL	Clydeport Operations Limited	PMSC	Port Marine Safety Code
COO	Chief Operating Officer	POL	Port of Liverpool
DCOO	Deputy Chief Operating Officer	POSL	Port of Sheerness Limited
DP	Designated Person	PPG	Peel Ports Group
DRA	Dynamic Risk Assessment	AGHM (Environment)	Assistant Group Harbour Master (Environment)
DGHM(HM)	Deputy Group Harbour Master (Hydrographic and Dredging)	QSSHE	Quality Security Safety Health and Environment
DGHM(MS)	Deputy Group Harbour Master (Marine Services)	SHA	Statutory Harbour authority
GHM	Group Harbour Master	RA	Risk Assessment
GTGP	Guide to Good Practice	SMMO	Senior Manager marine Operations (Also Known as Cluster Head of Marine
HIG	Hazard Identification Guide	SOP	Standard Operating Procedure
HPL	Heysham Port Limited	SOSREP	Secretary of State Representative
IALA	International Association of Lighthouse Authorities	SSP	Standard System Procedure
KPI	Key Performance Indicator	PD	Port Director
KPT	Key Performance Targets	TCAS	Training Competency and Standards
LPS	Local Port service	VTS	Vessel Traffic Service
MDHC	Mersey Docks and Harbour Company	GPCC	Group Port Control Centre
MGN	Marine Guidance Note	CHA	Competent Harbour Authority
MIN	Marine Information Note	LWI	Local Work Instruction
MMT	Marine Management Team	MAIB	Marine Accident Investigation Branch
MSCC	Manchester Ship Canal Company	GYPA	Great Yarmouth Port Authority
MSMS	Marine Safety Management System	GYPC	Great Yarmouth Port Company
MSN	Marine Safety Notice	MEA	Marine Environmental Advisor
OCSA	Organisational Change Safety Assessment	ATON	Aids to Navigation
MEINs	Marine Environment Information Notes	GMGISC	Group Marine GIS Coordinator

Introduction to the MSMS

This Peel Ports Group Marine Safety Management System (MSMS) is designed to deliver marine operations safely in the Ports of Ardrrossan, Clydeport, Great Yarmouth, Heysham, Liverpool, Manchester, Sheerness and Peel Ports Logistics owned and operated terminals around the UK. It has been compiled in line with the Port Marine Safety Code and the Guide to Good Practice.

The MSMS defines accountability, general/specific duties, powers and actions. It is acknowledged that each Statutory Harbour Authority within Peel Ports Group will have different powers, as detailed within its local legislation. Legislation is detailed in [SSP003](#). Peel Ports Logistics (HBT) has its own legislation from various railways acts.

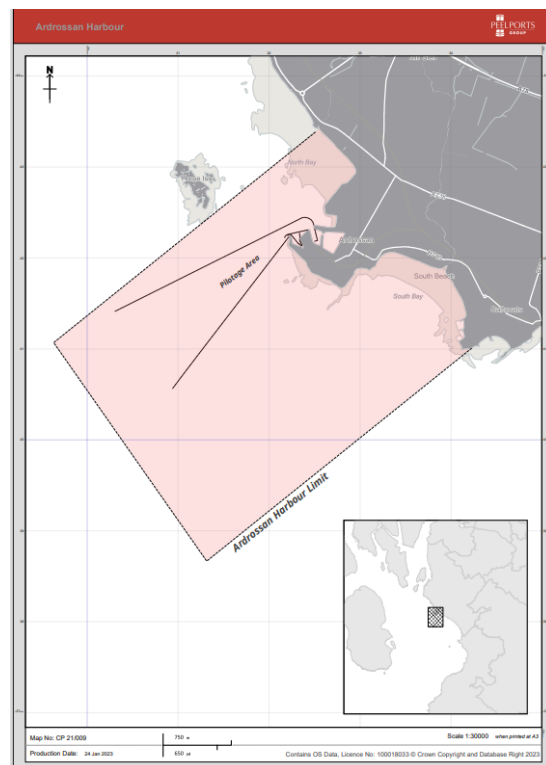
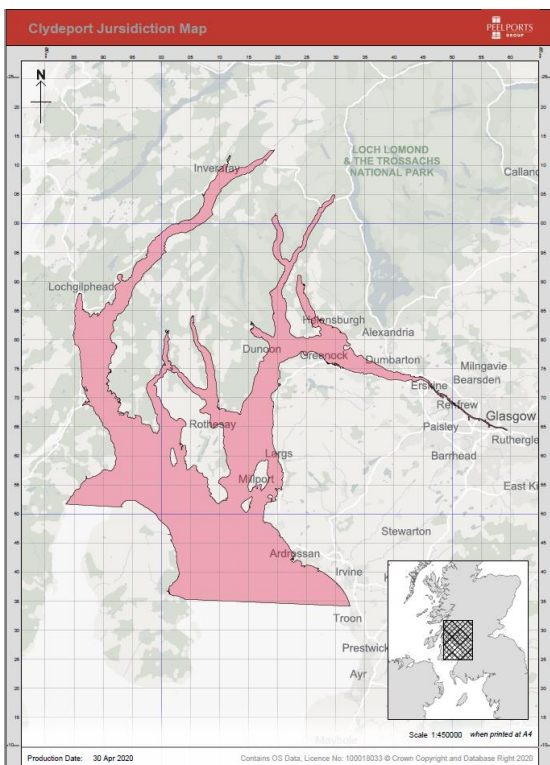
Peel Ports Group

Peel Ports Group is a unique network of strategically situated ports, terminals, hubs, shipping lines and state-of-the-art services. While much of this document is applicable at statutory harbour authorities and terminals within Peel Ports' ownership, there are, inevitably, some variations specific to the individual Ports and facilities. Where this is the case, the relevant paragraphs are clearly marked to reflect their application at that Port. Additionally, there are specific local Standard Operating Procedures (SOPs) in Volume II of this MSMS which will define the local application of MSMS procedures. Where applicable, these SOPs will be supported by Volume III Local Work Instructions (LWIs).

Statutory Harbour Authorities

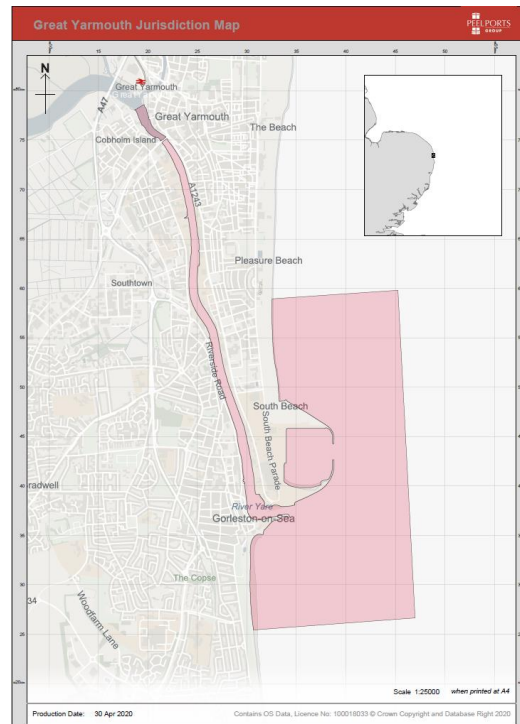
Peel Ports Group - Clydeport & Ardrrossan

Clydeport Operations Ltd (COL) is the Statutory Harbour Authority (SHA) and Competent Harbour Authority (CHA) for an area approx. 450 Sq. miles including the river and firth of Clyde including Sea Lochs. COL operate the Harbour of Ardrrossan on behalf of Ardrrossan Harbour Company Limited, who are the SHA, in accordance with the agreement of 12th June 2012.



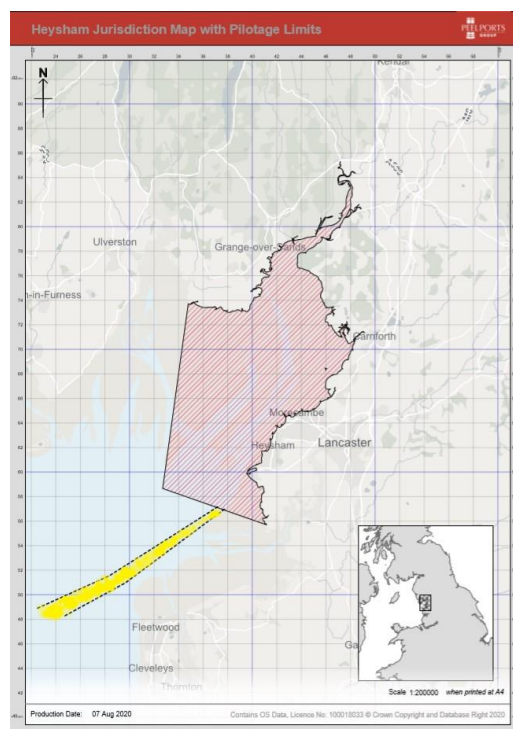
Peel Ports Group – Great Yarmouth

GYPC (Peel Ports) are the agent for GYPA (Great Yarmouth Port Authority) in the discharge of its duty as Statutory Harbour Authority and some elements that can be delegated of its responsibilities as Competent Harbour Authority (as covered in the GYPA/GYPC Pilotage arrangements agreement.)



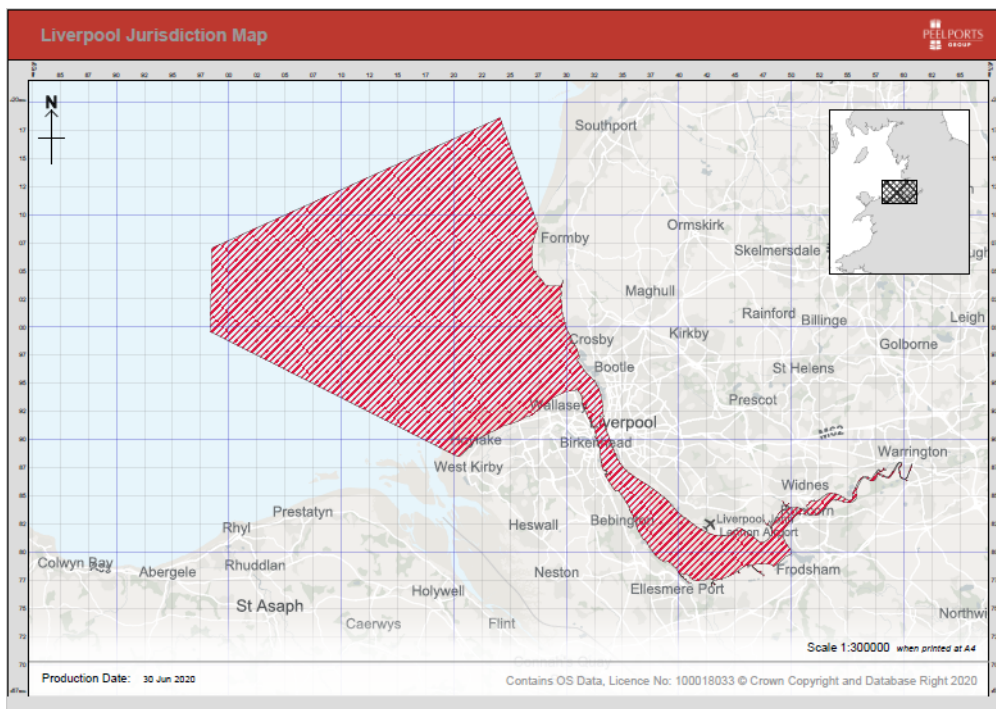
Peel Ports Group – Heysham

Heysham Port Limited is the Statutory Harbour Authority and Competent Harbour Authority (shown in Red) for Heysham Harbour and the extended Competent Harbour Authority area (shown in Yellow) for the Port of Heysham.



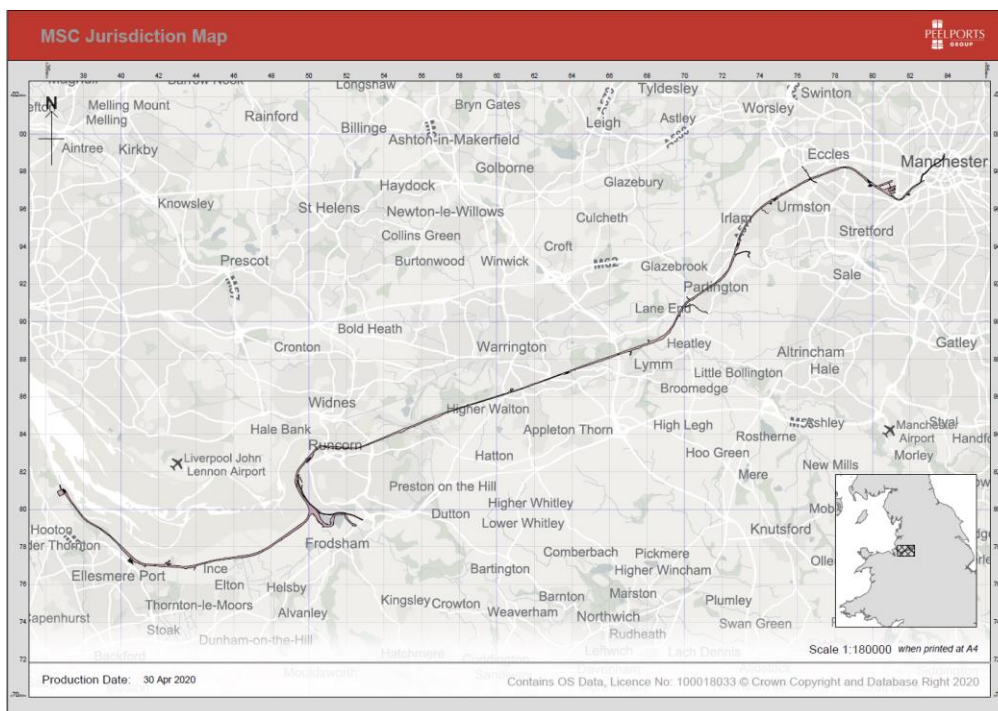
Peel Ports Group – Liverpool

Mersey Docks and Harbour Company Limited (MDHC Ltd) is the Statutory Harbour Authority and Competent Harbour Authority for the Port of Liverpool.



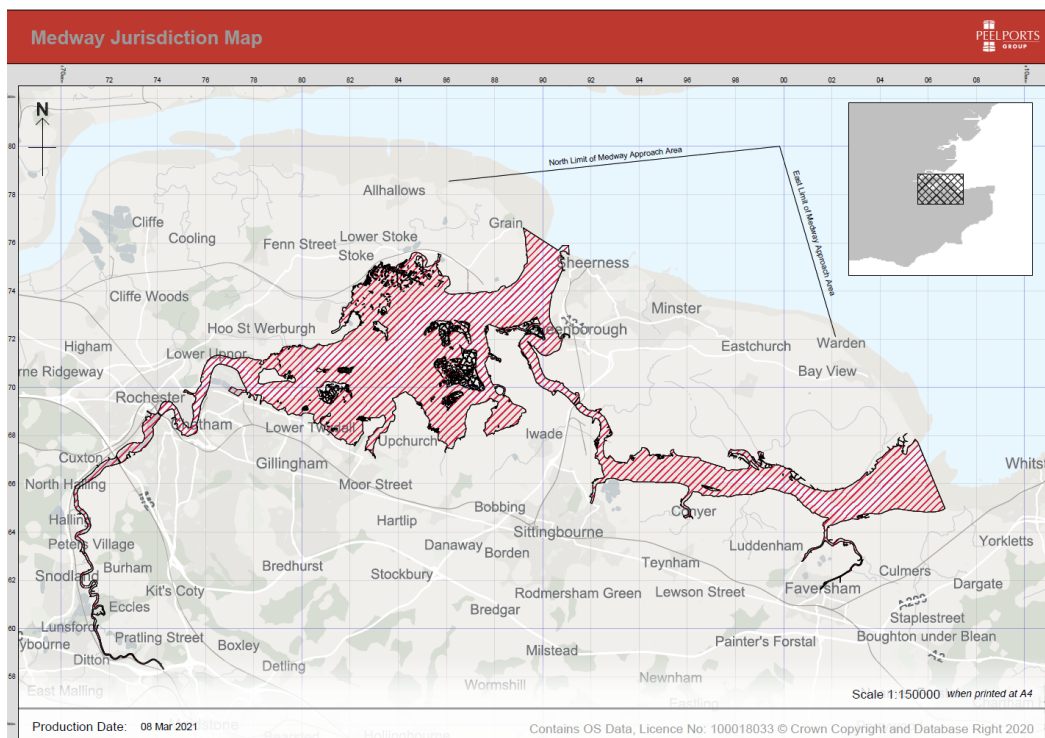
Peel Ports Group – Manchester

The Manchester Ship Canal Company Limited (MSCC) is the Statutory Harbour Authority and Competent Harbour Authority for the Harbour and Port of Manchester, which extends from the River Mersey at the Entrance to the Manchester Ship Canal at Eastham to Hunts Bank on the River Irwell in Manchester.



Peel Ports Group – London Medway

The Port of Sheerness Limited (PoSL) is the Statutory Harbour Authority and Competent Harbour Authority for the River Medway, from the Medway Buoy to Allington Lock, including the River Swale. In addition, PoSL also has statutory powers in the Medway Approach Area that has overlapping responsibility with the Port of London Authority (PLA) (shown by bold black line).



Terminal Operators

Peel Ports Logistics Operates terminals at Runcorn and on the Humber.



Port Marine Safety Code (PMSC) Requirements

The PMSC, “the Code” sets out a national standard for port marine safety. The code applies to all Harbour Authorities and other marine facilities, berths and terminals in the UK. To Comply, Statutory and Competent Harbour Authorities must consider the following 10 measures (Other facilities such as marine berths and terminals which are not a statutory authority or have statutory powers and duties should consider all and agree applicability with the SHA).

1. **Duty holder:** *Formally identify and designate the duty holder, whose members are individually and collectively accountable for compliance with the Code, and their performance in ensuring safe marine operations in the harbour and its approaches.*
2. **Designated Person:** *A ‘designated person’ must be appointed to provide independent assurance about the operation of the marine safety management system. The designated person must have direct access to the duty holder.*
3. **Legislation:** *The duty holder must review and be aware of their existing powers based on local and national legislation, seeking additional powers if required in order to promote safe navigation.*
4. **Duties and Powers:** *Comply with the duties and powers under existing legislation, as appropriate.*
5. **Risk Assessment:** *Ensure that marine risks are formally assessed and are eliminated or reduced to the lowest possible level, so far as is reasonably practicable, in accordance with good practice.*
6. **Marine Safety Management System:** *Operate an effective MSMS which has been developed after consultation, is based on formal risk assessment and refers to an appropriate approach to incident investigation.*
7. **Review and Audit:** *Monitor, review and audit the risk assessment and MSMS on a regular basis – the independent designated person has a key role in providing assurance for the duty holder.*
8. **Competence:** *Use competent people (who are trained, qualified and experienced) in positions of responsibility for managing marine and navigation safety.*
9. **Plan:** *Publish a safety plan showing how the standards in the Code will be met and produce a report assessing performance against that plan at least every 3 years.*
10. **Aids to Navigation:** *Comply with directions from the General Lighthouse Authorities and supply information & returns as required.*

Department for Transport and Maritime and Coastguard Agency Port Marine Safety Code.

Marine Safety Management System

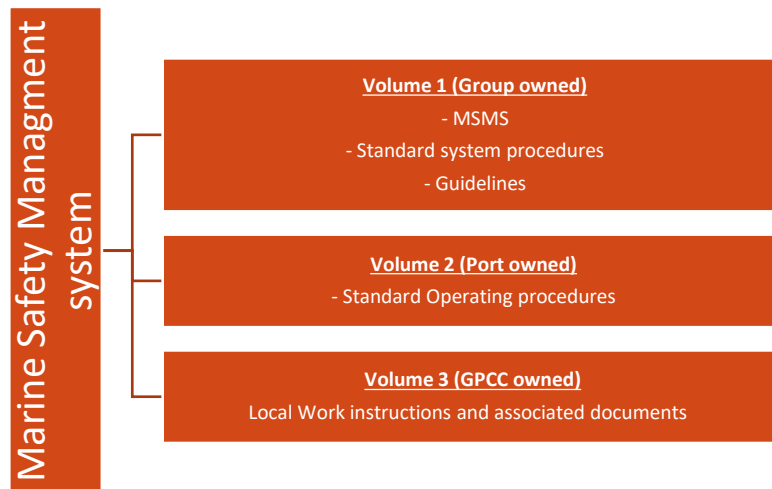
The PMSC requires all organisations to demonstrate compliance with the Code by developing appropriate policies and procedures relevant to the scope and nature of marine operations that take place within the organisations jurisdiction. The MSMS shall cover the safety management of all marine operations within the Peel Ports Group.

Peel Ports Group’ personnel and external contractors, are responsible for ensuring that the principles set out in this MSMS are complied with in all marine operations.

Organisations and facilities, such as marinas and terminals situated within the SHA should seek proportionate compliance with the PMSC through the adoption of a Formal Risk assessment process and the implementation of a MSMS. PPL (including HBT as far as relevant) are included within the Peel Ports Group MSMS. PPL are, in respect of facilities on the MSC to check with MSCC, and in respect of HBT, with the Humber SHA (ABP Humber Estuary Services (HES)) that the procedures are applicable and cover the requirements of the SHAs.

System structure

The MSMS is structured into 3 Volumes:



MSMS Volume 1

MSMS Volume 1 is owned by the Group Harbour Master (GHM), as the Harbour Master for the statutory harbour authorities within the Group and developed in consultation with each individual Duty Holder and local marine team, facility team, Group Marine and the Peel Ports Group Executive.

Section 1: The MSMS – Sets out the Marine Safety Policies, roles and responsibilities, and introduces the MSMS management processes applicable to all ports, terminals and Group Marine¹ staff. It also introduces the key control measures which are adopted for managing all marine risks in Peel Ports Group.

Section 2: Standard System Procedures (SSP)– the set of standardised administrative and operational procedures which are common to all ports within Peel Ports Group and Group staff to provide the consistency in approach to safety management.

Section 3: Guidelines – These guidelines outline the minimum standard required across the group. Individual ports are to conduct a gap analysis and produce local addendums if required and issued in Vol 2. They are to be agreed with the GHM.

- Bunker Procedures Guidelines
- Mooring Guidelines
- Towage Guidelines
- Group Marine Emergency Plan (To be amalgamated into the Group Crisis Management Plan)

MSMS Volume 2

MSMS Volume 2 is Port specific and owned by the SMMO at the individual Ports and the Operations Director at Peel Ports Logistics owned terminals and facilities.

Volume 2 Local Standard Operational Procedures (SOPs).

SOPs are a set of high-level port/terminal specific procedures that aim to cover all applicable elements of the PMSC which are not standardised in an SSP and are not already covered in Volume 1. Whilst the SOPs will be tailored to local operations, the layout is consistent across all locations.

¹ Group Marine encompasses all Group and Local and Marine Staff.

Examples of these port specific plans, forms and reports are:

- Navigation Guidelines & Policies;
- Pilotage Directions;
- Port Emergency Procedures;
- Peel Ports Group' Oil Spill Contingency Plans;
- Notices to Mariners;
- Local Towage Guidelines;
- Bunker Procedures
- Mooring guidelines
- Local Legalisation
- Training Manuals and guidelines
- Marine Risk Management Database
- Incident management database
- Committees/ Public forums/Steering groups

MSMS Volume 3

MSMS volume 3 is port specific and owned by Group Port Control (GPCC)/local ports.

Volume 3 Local Work instructions and associated documents

Volume 3 consists of Local Work Instructions (LWIs) that are linked to and support the requirements of the individual port SOPs and set out operating instructions for VTS/LPS. .

Applicable National and Local Legislation

Each Statutory Harbour Authority derives its duties and powers from its own legislation in the form of Acts and Orders, and although they have much in common, the detail varies from port to port. HBT also has its own legislation derived from Railway Acts.

A Summary is shown in the table below. [SSP003](#) summarises national legislation applicable to ports and port specific legislation.

Ports	General Direction	Special Direction	Harbour Direction	Pilotage Direction	Byelaws
Androssan	No	Yes	No	Yes	Yes
Clydeport	Yes	Yes	Yes	Yes	Yes
Great Yarmouth	Yes	Yes	No	Yes	Yes
Heysham	No	Yes	Yes	Yes	Yes
Liverpool	Yes	Yes	No	Yes	Yes
Manchester	No	Yes	Yes	Yes	Yes
Medway	Yes	Yes	No	Yes	Yes

*Unless stated Peel Ports owned terminals and facilities do not have the powers to enact any of the above.

Third party contractors

Peel Ports Group integrate long-term contractors into the MSMS where applicable by ensuring through audit that their respective safety management systems complement Peel Ports Group` MSMS. External contractors supporting marine operations may be audited by Peel Ports Group to ensure they comply with the safety systems put in place.

All long-term contractors operating in compliance with the MSMS include Pilotage providers, licensed towage operators and the licensed boatmen's companies will be operating under their own Safety Management System but are subject to periodic due diligence and safety audits and inspection by the Ports

in accordance with management of contractors' procedures. Harbour and Port craft operators may also be subject to port licencing and registration regimes in accordance with local legislation.

Long term contractors are expected to be familiar with and operate in accordance with the Peel Ports Group MSMS. It is the responsibility of the local ports and individual facilities to ensure that contractors and service providers are appropriately familiar and are checked. Local ports and contract managers shall conduct relevant due diligence of contractors' safety procedures in accordance with the Peel QSHE Management of Contractors procedures and Group Marine [SSP008](#).

Policy

Peel Ports Group has several marine policies for the purpose of committing to safe and compliant marine operations throughout the Group. MSMS Polices will be reviewed at least every 3 years to ensure they remain relevant and responsive to organisational need.

The marine policies are all contained within [SSP013](#).

Policy Name	Last Review Date	Expiry date of current Policy
Port Marine Safety Code Policy Statement	19-Jul-22	19-Jul-25
Group Marine Navigational Safety Policy	1-Jan-21	1-Jan-24
Group Marine Pilotage policy	1-Jan-21	1-Jan-24
Group Marine VTS/LPS Policy	1-Jan-21	1-Jan-24
Group Marine Enforcement & Prosecution Policy	1-Jan-21	1-Jan-24
Group Marine Environmental Policy	1-Jan-21	1-Jan-24
Group Marine Training Policy	1-Jan-21	1-Jan-24

Policy Development & Review

Responsibility for the production of marine policies will be undertaken by the Group Harbour Master (GHM). The GHM drafts policies in consultation with Group Marine, Senior Marine Manager Operations (SMMOs and Duty Holders. Policies are then signed by the Duty Holders. Polices are valid for 3 years at which point they are formally reviewed and amended as necessary.

External Communication of policy & plans

Peel Ports Group' publishes a 3-year safety plan for each port and reports annually against its objectives. The Group Marine Department promulgate the policies and plans through the port web pages but the plan is owned by the Duty Holder.

Commitment Statement

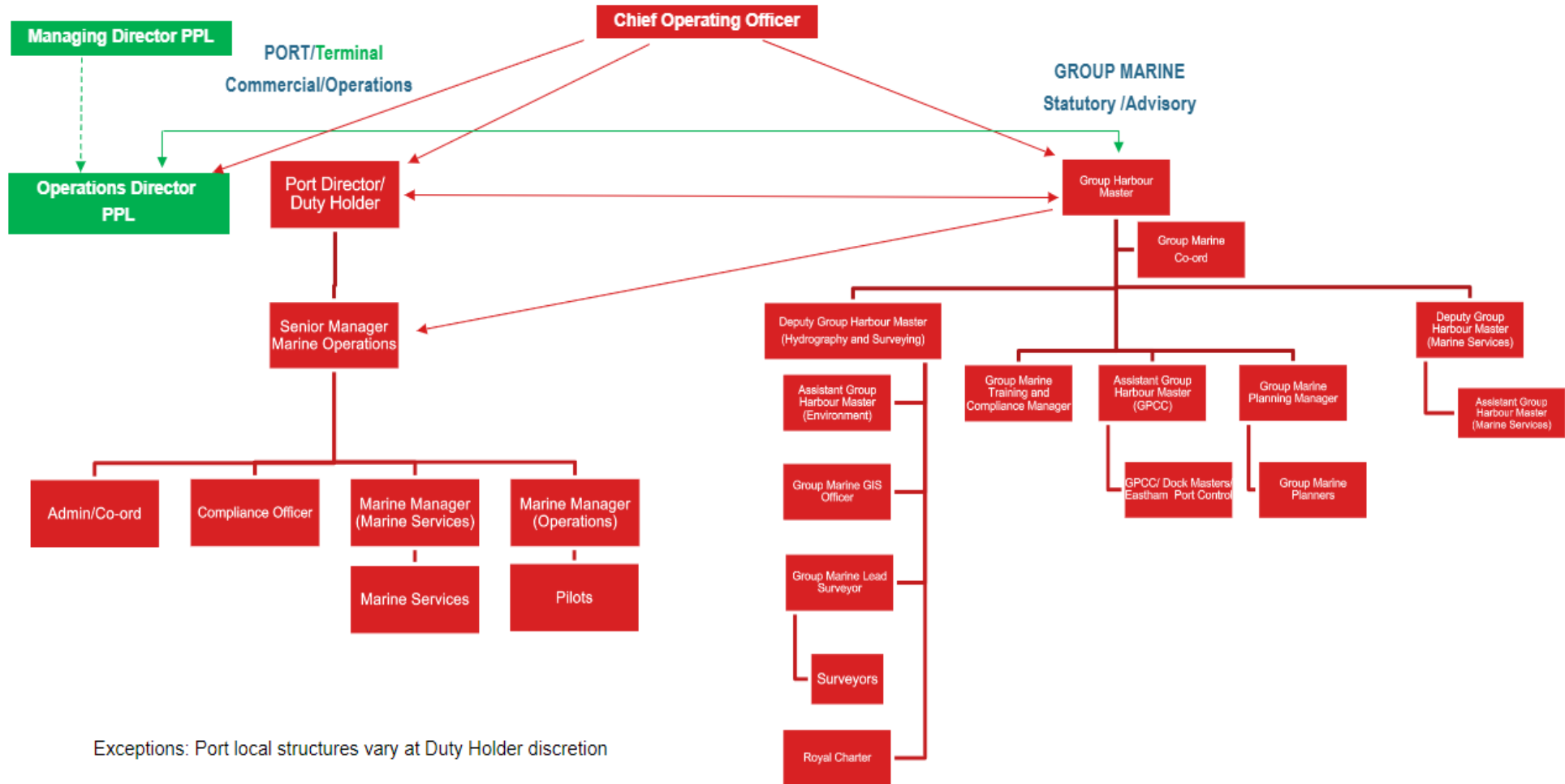
The Chief Executive Officer (CEO) is the signatory to the Peel Ports Group "Port Marine Safety Code Policy statement".

External audits are carried out at least every 3 years by the DP. The audit will be on the operational compliance with the MSMS but may additionally comment on the compliance of the MSMS with the current PMSC.

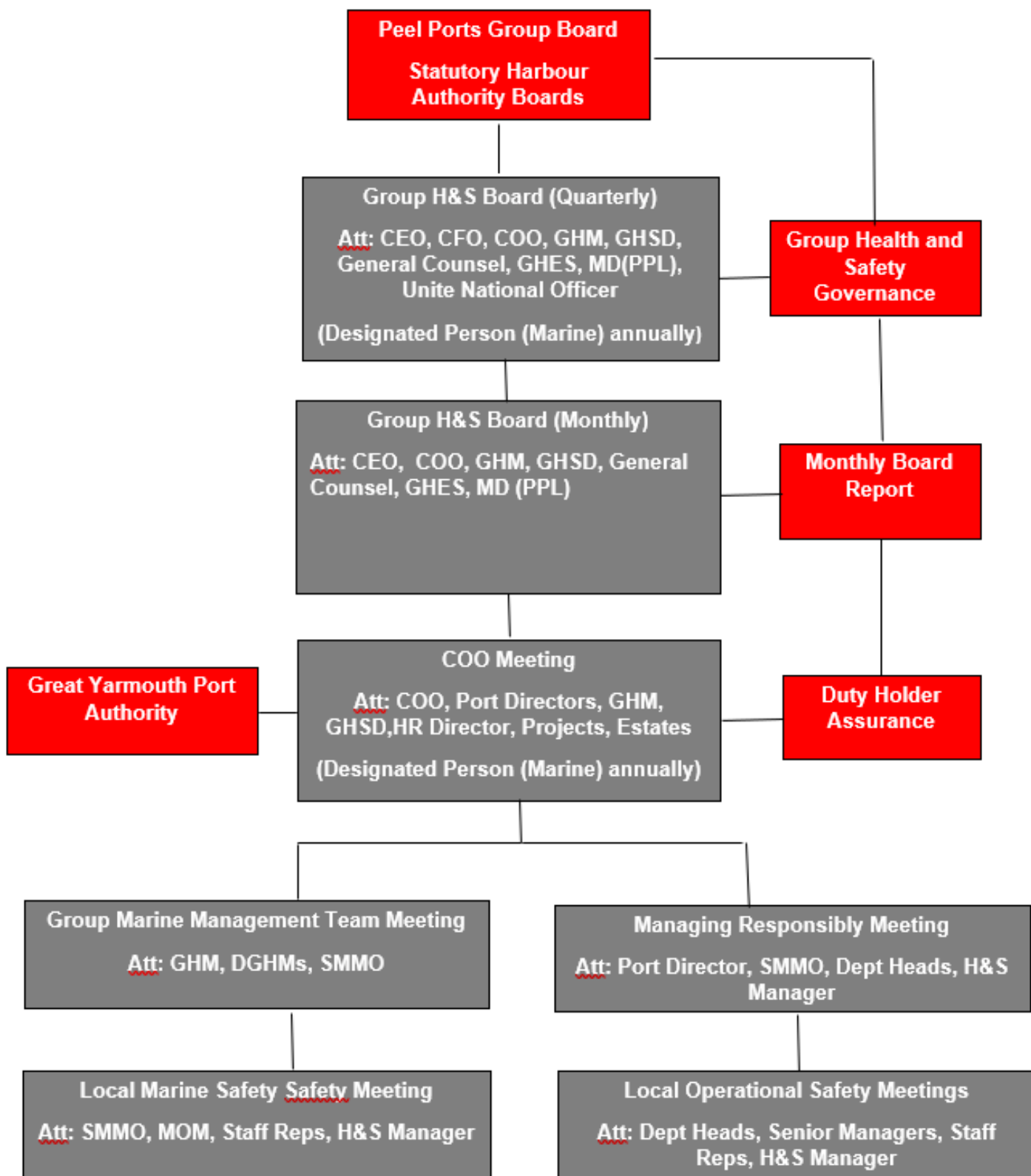
The DP also prepares an Annual report to Peel Ports Group to inform the Duty Holders of their current status in respect of compliance with the Port Marine Safety Code (DfT/MCA,2016).
(Signed Commitment statements at end of section 2).

Marine Management structure within Peel Ports Group

Marine Structure



Management of Marine Safety



Responsibilities

The Port Directors as the Duty Holder for their respective SHAs and the Operations Director of PPL I are accountable for safe and efficient marine operations and the provision of the local marine resources to put the safety and marine environment policies set by the Group Harbour Master and listed in the MSMS into effect. The Group Harbour Master has operational responsibility for all matters related to marine safety in Peel Ports Group, accountability of group marine facilities, and for implementing and reviewing marine policies.

It is the responsibility of everyone within Peel Ports Group to follow and enforce safety procedures and to stop any activity that they may consider to be a marine risk. All individuals will report unsafe conditions to the Marine Management Team, and any activities which have been stopped for safety reasons.

As per the PMSC 1.2 - *The key to effective discharge of the functions described in the Code is the development and proper operation of a MSMS for marine operations. That, in turn, depends upon a clear assignment of relevant executive and operational responsibilities to the organisation's staff.*

Roles that have direct impact on delivering of the Marine safety Management System are listed below:

Chief Executive Officer (CEO)

The CEO is accountable for the operational and financial control of Peel Ports Group. They will advise the organisation on all matters related to its duties and powers, with appropriate advice from the Group Harbour Master and other officers.

They will:

- oversee the implementation of its policies and decisions;
- have overall executive responsibility for the safety of operations and staff; and
- will oversee the recruitment and training of staff.

Chief Operating Officer (COO)

The main safety responsibilities of the (COO) are to:

- Empowers the Group Harbour Master to implement the MSMS and ensures that regular assessments of the MSMS's performance are made;
- Embody the commitment of Peel Ports Group to its Group Navigational Safety Policy and goals, using their leadership role and suitable public occasions to reinforce this message both internally and externally to Peel Ports Group.

Group Harbour Master (GHM)

The GHM is responsible for delivery of Marine Safety and statutory compliance of Peel Ports Group including safety of navigation, pilotage, conservancy, pollution prevention and contingency. The GHM's responsibilities include but are not limited to:

- To advise and support the Duty Holders in the discharge of their responsibilities.
- A dotted line to the local marine teams for marine standards and practices
- Marine operations related safety issues;
- In conjunction with the Duty Holder ensure Formal Risk Assessments are in place and carry out risk assessments as necessary;
- Represent Peel Ports Group on safety matters in dealings with external bodies;
- Provide assurance that risks have been identified and assessed, and that effective risk control measures are in place;
- Set performance targets for the Marine Division
- Communication of necessary information throughout the organisation;
- Competence and structure of all marine staff;

- Monitor the safety performance of operations;
- Conservancy, e.g. aids to navigation and hydrographic surveying;
- Marine Environmental compliance and duties;
- Review the performance of the MSMS to ensure its continued suitability and effectiveness;
- Report regularly to the COO on the effectiveness of the MSMS and planned improvements.

Port Directors (Duty Holder)

The Port Directors are the appointed Duty Holders as defined in the PMSC for their respective SHA and individually accept responsibility and accountability for ensuring that the requirements of the PMSC and Marine Safety Management System are met.

They also have responsibility and accountability for delivering the respective Harbour Authority's duties and powers in relation to marine operations and harbour undertakings within their control, through the application of the Group Marine Safety Management System; the Port Directors of the respective ports are responsible for the operational and financial control of each of the Harbour Authorities.

Port Directors are accountable for all safety within their respective port, manage all non-Statutory marine aspects of port operations, They are supported in this role by the GHM and DP, who provide subject matter expert advice.

Operations Director, PPL (Duty Holder)

The Operations Director at PPL is the appointed Duty Holder as defined in the PMSC for the Humber Bulk Terminal and all terminal operated by PPL and individually accepts responsibility and accountability for ensuring that relevant requirements of the PMSC are met.

They also have responsibility and accountability for delivering the terminal's duties in relation to marine operations within their control, through application of the Group Marine Safety Management System; the Operations Director is responsible for the operational and financial control of the terminal.

The Operations Director is accountable for all safety within the terminal and management of all non-statutory marine aspects of terminal operations. They are supported in this role by the GHM and DP, who will provide subject matter expert advice.

Designated Person (DP)

The Designated Person is independent and appointed in accordance with the PMSC and is responsible for auditing the MSMS. Their duties include:

- Reporting to the Port Directors and Group Harbour Master on marine safety matters;
- Annually review the effectiveness of the MSMS and the port's compliance with the PMSC and provide independent assurance to the Duty Holder, that the MSMS is working effectively;
- Make quarterly MSMS monitoring reports;
- Make annual presentations of the review to the Duty Holder;
-
- Carry out the formal 3 yearly compliance audits;
- Carry out any other safety related assurance as the Duty Holders require.
- Conduct annual visits to each port to meet the Duty Holder.

Deputy Group Harbour Master (Hydrographic and Dredging) (DGHM(HD)))

The DGHM(HD) is Responsible for the Group functions and delivery of:

- Deputy to the Group Harbour Master
- Hydrography
- Dredging
- Met Ocean
- GIS (Geographic information system)
- Environmental compliance
- 3rd party contract management in function areas
- Strategic development for function areas

Senior Manager Marine Operations (SMMO)² / Head of Marine (HOM)

The SMMO (Clydeport and Ardrossan, South East Cluster and Mersey cluster) supported by their local marine teams³ are responsible to the Group Harbour Master (Harbour Master) for the delivery of statutory compliance of their respective ports and are appointed by the respective Statutory Harbour Board as deputies to the Harbour Master.

They have full delegated statutory powers drawn down from the Harbour Master (GHM). The Senior Marine Managers (Supported by Group Marine functions (GPCC (vessel traffic services)/Marine Services (Hydrography, Dredging and Aids to Navigation)) manage navigation within the port limits, ensures safe functioning of port marine facilities (berths, docks, navigational equipment, etc.) monitors Harbour craft for statutory compliance, enforces port regulations, etc.

In addition, the Senior Manager Marine Operations have the following related responsibilities:

- Developing high levels of marine safety awareness amongst the staff and contractors, through encouraging workforce involvement and training.
- Following the marine safety targets set by the Group Harbour Master and cascading these to all staff for their accountabilities in the MSMS;
- Co-ordination and monitoring of the implementation of the MSMS;
- Advises on marine operations related safety issues within their port;
- Provides assurance that risks have been identified and assessed, and that effective risk control measures are in place;
- Participates in the Marine Management Team;
- Facilitates and promotes if necessary, the ports participation in formal PMSC Local Liaison Committee (with port users) and promotes co-operation between Quayside Personnel, Pilots, Tug Masters, Boatmen, Pilot Vessel Crews and Port Users;
- Initiates corrective action with their area of responsibility
- Local service requirement for conservancy functions such as hydrography and aids to navigation and marine services such as dredging and asset maintenance;
- Ensures the communication of necessary marine information throughout the port;
- Ensures the competence of marine department personnel;
- Monitors marine safety performance in the port
- Maintenance of the Risk Management system
- Ensure Investigation of all Marine Incidents
- Manages marine assets;
- Delivers safe berths by liaison with Engineers and Pilots as required;
- Disseminate lessons learned from marine accidents or events;
- Reviews the MSMS effectiveness in their port, suggesting improvements where necessary and setting new targets;
- Ensures safety induction training of new, promoted or transferred staff.

² Designated as Deputies to the Harbour Master

³ Minimum requirement as defined in the MSMS structural diagram.

Deputy Group Harbour Master (Marine Services) (DGHM(MS))

The DGHM(MS) has specific management responsibilities in support of Group ports' MSMS compliance. They will include:

- Deputy to the Group Harbour Master
- Management of the contracted DP's service provision;
- Contract management of the Group Contracts for aids to navigation, oil spill response, Bollard testing and marine services;
- Management of additional Group Marine functions as they develop in support of MSMS compliance;
- Delivery of the internal MSMS audit schedule and to carry out audits alongside other auditors within the Group;
- Delivery of Group Training Competency and Standards Working Group within MMT;
- Delivery and Management of Group wide initiatives & projects
- Management of training & learning management system for Group Marine
- Group support for SAP applications
- Management and development of Peel Ports Risk Assessment tool

Assistant Group Harbour Master (Environment) (AGHME)

The AGHM (Environment) has specific management responsibilities in support of Group ports' Environmental Compliance. They will include:

- Ensure continued environmental compliance to deliver duties to conserve the marine environment.
- Oversee the delivery of marine targets included within the Group Environment and Sustainability Plan.
- Responsible for development and provision of support for the implementation of the Group Marine Environmental Checklist.
- Responsible for development of and provision for support of the implementation of biosecurity management through the Group Marine Biosecurity Plan.
- Monitoring developments in regulations and legislation to protect business continuity and SHA interests
- Management of marine environmental data.
- Developing and maintaining the Environmental GIS with the GMGISC
- Coordinate the beneficial re-use of dredge material across each SHA with the DGHM (HD) to deliver environmental benefits.
- Coordinating marine response to climate change resilience and business opportunities
- Management of key stakeholder engagement
- Delivery of MEINs
- Delivery of Environmental Workshop to Marine Teams

Assistant Group Harbour Master (GPCC) (AGHM(GPCC))

The AGHM(GPCC) is Responsible for the Group functions and delivery of:

- Management and the overall operational efficiency, including standards and practices of Group Port Control Centre and the delivery of vessel traffic services,
- Management of the GPCC equipment sustainability plan and capital investment programme.

Pilots

In addition to the Pilots' responsibilities under the pilotage act The Pilots operating within the CHA are responsible for their compliance with the MSMS.

The Pilots have the following safety responsibilities:

- Advising on pilotage safety issues;
- Raising pilotage safety issues on the Pilotage Management Committee;

- Monitoring safety performance during pilotage when required;
- Relevant reporting requirements will be established between SMMOs/Pilotage Manager and external pilotage providers.

(External pilotage providers are also required to comply with the MSMS and to contribute to its development and review.)

Internal Management Committees

In order to effectively manage marine safety and the operation of the MSMS, several internal committees have been established as per table below. These committees should be regarded as part of the marine management structure at Peel Ports Group

Committee	Attendees	Topics covered
Shareholders EHS Board (BI Monthly)	CEO, COO, H&S Director	Provides an update, by the COO, on Statutory Harbour Issues and marine related incidents. The Designated Person or in his unavailability the GHM will deliver the annual marine DP report to this board.
EHS Board (Quarterly)	CEO, COO, MD(Group Services), CFO, Legal Counsel, H&S Director, GHM, Group Head of Energy and Environment, MD (PPL)	This is the primary Executive Health and Safety Governance board in the company which oversees the requirement and establishment of Environmental, Health and Safety policy. It will endorse the Personnel, Equipment, Training and Sustainability requirements of the marine department. The Designated Person will deliver the annual report to this board.
EHS Board	CEO, COO , H&S Director, GHM, Group Head of Energy & Environment, MD (PPL)	Is the Executive Operational Environmental Health and Safety Board that reviews monthly safety incidents and provides guidance on subsequent recommendation made by the GHM on marine safety aspects.
Port Operating Board (Bi- Monthly)	COO , Duty Holders, H&S Director, GHM, DP	Primarily a commercial board to review performance it is also an opportunity for the GHM to update the Duty Holders on marine safety issues and policies. The Designated Person/GHM will deliver the annual DP report to the Duty Holders
Pilotage Management Committee. (At least quarterly as defined by local port)	GHM (attends at least once a year) Marine Managers, Pilot Reps	Discuss Marine Safety issues and other relevant Port/Pilotage operational and safety issues. The Senior Manager Marine Operations or his deputy chair this Committee.

<p>Marine Management Team</p> <p>(Monthly)</p>	<p>GHM, Senior Managers Marine Operations, Group Services Manager</p>	<p>IT steering group Audits Training (Group Marine Training Matrix review; training queries, proposed changes, new course development)Hydrographic update GPCC update Register of Marine Safety Issues; Register of MSMS Legislation and other requirements; Harbour Authority Powers Review Enhancement plan review Review MSMS Enhancement Tasks; Analyse Marine Accident reports and statistics; Consider issues of a repetitive nature from the Local PMSC Liaison Committees; Discuss Policy items with a policy aspect; Changes/New Legislation that could affect the MSMS</p>
<p>Marine Safety Meeting's (as defined by the SMMO)</p> <p>(At least once a year)</p>	<p>Senior Managers Marine Operations, Pilot Reps, Marine Managers, QSSHE, Employee Reps, Main Contractors</p>	<p>Provide a forum through which all aspects of health and safety can be addressed and ensure that Peel Ports Group Health and Safety Policies are adhered to; To advise and assist Port Directors and the Group Harbour Master in the discharge of their health and safety responsibilities, considering, and where necessary taking appropriate action on: Employee Reports (Hazardous Observations etc.); Reports on accidents and incidents carrying a risk to health and safety and Other reports generated by the Health and Safety Department To refer any general safety issues for consideration by the Health and Safety Department; To consider any other issues concerning the health and safety of staff members while carrying out their work; To bring to employees' attention any matters of safety; To provide information on accident causes and prevention; To actively promote a work environment with positive effects on psychological and physical Health; Records of Decisions and Actions for meetings must be produced by the designated Health and Safety Committee Chairman and posted on notice boards with a copy being sent to QSSHE Department, within one calendar week of the meeting.</p>

Implementation, system operation and control of the MSMS

Creation of the MSMS

The MSMS and procedures are derived from an initial Hazard ID (HazID), Formal Safety Assessment (FSA) and continuing Formal Risk Assessment (FRA) process (the process for FSA and FRA is described in [SSP012](#)). The Performance Management [SSP010](#) has been put into place to monitor the overall effectiveness of the MSMS and give strategic direction in Continuous Improvement.

MSMS Review

Management reviews focus not only on compliance but also on the overall MSMS effectiveness and continued suitability for purpose.

Regular reviews include, as appropriate:

- internal and external audit process ([SSP004](#))
- The monthly Marine Management Team Meeting
- Changes in the marine activities and procedures ([SSP014](#))
- Major modifications of docks/ports and waterways
- Accident or audit follow-up actions that require review
- Risk assessment review ([SSP012](#))
- Changes in applicable Legislation ([SSP003](#))

Management of Change

Change can occur in an organisation in many ways including strategic, leadership and technological changes. By helping employees better understand change, the workplace can be more open-minded and open to change. Change management can help ease tensions and create a smoother process.

Change management communicates why change is happening, what it will look like and how it will benefit the stakeholders. Keeping employees informed from the start helps smooth the transition and increase the chances of success. If employees are more open to change, they will be more engaged in the process of making it happen. When employees are more engaged, the transition can happen more quickly and ultimately save Peel Ports time and resources.

All organisational changes must be authorised by the PMSC Duty holder or Port Director. Thereafter approval is required from the GHM.

[SSP009](#) describes the process in more detail.

Periodic Reviews

In addition to the above, Peel Ports Group will review the MSMS every 3 years with the DP also conducting 3 yearly compliance audits.

Document Control

MSMS documentation is periodically reviewed as per the various methods described above.

Editorial rights to the Volume 1 (this document) are maintained by the GHM for document security. It is the responsibility of the GHM to update and maintain the Marine Department Library of Documents.

For any Changes to Volume 2,3 and supporting documents (as defined); Prior to implementation, all changes shall be consulted in accordance with [SSP014](#).

Key Marine Risk Management Controls & Procedures

Navigational safety and Marine safety operational procedures and controls are derived from Formal Risk Assessment (FRA) and legislation, however the Key controls are summarised here:

Marine Risk Assessments

A marine risk assessment is a systematic examination which considers whether risks in Peel Ports Group marine operations have been reduced to As Low As Reasonably Practicable (ALARP) utilising the PEAR principle.

- **People**
- **Environment**
- **Assets**
- **Reputation & Business Impact**

Peel Ports Group Risk Assessment Procedure [SSP012](#) describes the methodology for conducting and reviewing MSMS Risk Assessments, and the maintenance of the Risk Register.

Marine Conservancy

Peel Ports harbour authorities have a duty to conserve their harbour so that it is fit for use as a port, and a duty of reasonable care to see that the harbour is in a fit condition for a vessel to resort to it. Similarly it is in the interest of Peel Ports owned terminals and facilities to ensure their berths are suitable for the vessels they are receiving. The conservancy duty covers several specific requirements to-

- to survey (and resurvey as regularly as necessary) and find the best navigable channel or channels;
- Place and maintain navigation marks where they will be of the best advantage to navigation (marked appropriately by day and night);
- Keep a 'vigilant watch' for any changes in the sea or riverbed affecting the channel or channels and move or renew navigation marks as appropriate;
- Keep up to date hydrographic and hydrological records
- Publish as conspicuously as possible such further information as will supplement the guidance given by navigation marks.
- Asset disposal

This is explained in further detail in [SSP005,006,007](#) and [016](#)

Pilotage

It is Peel Ports Group Policy that all CHA's within the Group shall:

- Ensure that the operation of the pilotage service is compliant with national regulations, guidelines and competency standards;
- Publish and review its Pilotage Directions;
- Regulate the compulsory pilotage area limits;
- Maintain competent and authorised pilots;
- Maintain a fully supported Pilotage service, able to respond to properly notified pilotage requirements;
- Keep the means of boarding and landing pilots under review to ensure that these operations are always undertaken as safely as possible;
- Administer the PEC system to ensure that all PEC applicants and holders fully meet the requirements laid down in Pilotage Directions.

This is explained in further detail in local Port SOPs (Volume 2)

Where a Peel Ports owned facility or terminal is located within a CHA not operated by Peel Ports, the terminal will co-ordinate with the CHA to assist with the delivery of that Pilotage service as required.

Vessel Traffic Management Services (VTMS)

It is Peel Ports Group Policy that all SHAs within the Group shall:

- Operate a vessel traffic management / information system⁴ in accordance with its published Navigational Safety Policy;
- Provide a service commensurate to the level of risk;
- Maintain VHF communication with all vessels required to do so by direction within its area of responsibility;
- Seek to ensure the traffic management / information system's operational availability;
- Review regularly the performance of the system and seek improvements through technical enhancement, staff development, training and effective management as necessary;
- Where VTS is assessed as appropriate, maintain standards for training and certification of personnel in line with IALA recommendations V-103;
- Formally authorise those personnel qualifying to the required IALA standard;
- Record, where provided or available, all relevant radar video, VHF and telephone communications as an aid to enforcement and incident reconstruction and investigation;
- In the event of an incident all relevant recordings shall be downloaded and stored;
- Maintain comprehensive details and records of commercial vessel movements in the vessel management system database.

the function of VTS services is explained in further detail in MSMS Volume 2- Local Port SOPs and Volume 3 (LWIs) . Where a Peel Ports owned facility or terminal is located within a SHA not operated by Peel Ports, the terminal will co-ordinate with the SHA to assist with the delivery of the traffic management service as required

Legal Powers and Duties

The SHA's are responsible for Marine Safety Management which includes the maintenance of appropriate regulatory framework, including the revision of byelaws, directions; and the publication and promulgation of navigational information and advice e.g. Notices to Mariners etc.

Each Harbour Authority derives its powers from its own legislation and are contained in local Acts and Orders (such as byelaws, special or general directions and, for competent harbour authorities, pilotage directions), and although they have much in common, the detail varies from port to port. [SSP 003](#) looks at the general overarching legislative principles that underpin the duties and powers of a harbour authority.

Emergency Preparedness and Response

Peel Ports Group has established port specific Local Emergency Procedures (LEP) for the response to marine related emergencies. These procedures are developed for the response to general marine incidents and (to comply with the Dangerous Goods in Harbour Areas Regulations 2016 (DGHAR)) to manage dangerous substances in the respective locations.

The procedures cover:

- Alarm and call out procedures;
- Roles and responsibilities of relevant organisations and authorities;
- Systems and procedures for command and control of incidents;
- Procedures for communication;

⁴ Vessel Traffic Service or Local Port Service determined by risk assessment.

Group Crisis Management Plan

The Peel Ports Group Crisis Management Plan (GCMP) sets out the action to be taken in the event of either a serious marine emergency occurring within any group port or a shore incident within the port estate. The decision on categorisation rests with the Executive in consultation with the local Port Director and/or the Group EHS Director and/or Group Harbour Master.

Responsibility for the production of the plan and the co-ordination of interested organisations has been undertaken by the Group EHS Director (GEHSD) and the Group Harbour Master (GHM).

Ports Oil Pollution Preparedness, Response and Co-operation

The GCMP focuses on various emergency scenarios and the provision of an appropriate response. If the incident involves significant oil pollution, then Port Specific Oil Spill Contingency Plans will be invoked and, if necessary, The National Contingency Plan. Peel Ports Group Oil Spill Contingency Plans follow the guidelines for OPRC plan and are approved by the Maritime and Coastguard Agency. Each location within the group has its own detailed OPRC plan.

Dangerous Vessels

The Dangerous Vessels Act 1985, empowers the Harbour Master to issue directions prohibiting the entry into, or requiring the removal from, the harbour of any vessel if, in the Harbour Masters' opinion the condition of that vessel, or the nature or condition of anything it contains, is such that its presence in the harbour might involve a grave and imminent danger to the safety of persons or property or risk that the vessel may, by sinking or foundering in the harbour, prevent or seriously prejudice the use of the harbour by other vessels.

SOSREP

The role of the Secretary of States' Representative for Maritime Salvage and Intervention (SOSREP) was created in 1999. SOSREP represents the Secretary of State for the Department of Energy and Climate Change in relation to offshore installations, and the Secretary of State for the Department for Transport in relation to ships and tankers. The SOSREP is in automatic charge of the emergency response to a serious marine incident.

In practical terms, SOSREP will take their decisions based on the advice given by the particular experts in action on the emergency. They will agree the salvage plan provided by the salvage contractors and will require it to be amended in the light of other strong advice. They may ask for additional resources, or call upon other expertise. SOSREP is empowered to make crucial decisions, often under time pressure, without recourse to a higher authority, where such decisions are in the "overriding UK public interest".

Civil Contingencies Duty

The Civil Contingencies Act 2004 provides a framework for civil protection in the event of an emergency that threatens serious damage to human welfare, the environment or security,

Peel Ports Group Harbour Authorities are classified as category 2 "cooperating bodies". They are involved in the associated planning work, and heavily involved in incidents that affect the marine sector. They are committed to co-operating and sharing relevant information with category 1 (emergency services and local authorities) and other category 2 responders.

Terminals or facilities owned and operated by Peel Ports will liaise with the Harbour Authority to support as required.

Environmental Management

Peel Ports Group are committed to fulfilling their SHA functions and responsibilities with regard to conservation of the marine environment and other related environmental compliance. They also have an obligation as a competent authority where a Special Protection Area for Birds or a Special Area of Conservation has been designated under the Habitats Directive and must comply with The Natural

Environment and Rural Communities Act 2006 which strengthened the requirement for public bodies, including statutory undertakers, to have regard for biodiversity when undertaking their activities.

Under the Regulations implementing the Water Framework Directive, PPG must have regard to the relevant River Basin Management Plan to ensure the protection of inland surface waters (rivers and lakes), transitional waters (estuaries), coastal waters and groundwater. In order to deliver these responsibilities, Peel Ports Group employ a dedicated AGHM (Environment) and an external Marine Environmental Advisor to give advice and assurance on compliance. All the ports have or will have established a Maintenance Dredging Protocol and Water Framework Assessments are carried out and measures implemented, where applicable, to achieve a 'good ecological status'.

A Marine Environmental Checklist is available to ensure compliance with the environmental requirements of the Harbours Act (1964) and other national regulations where a port is licencing or undertaking works.

Details of delivery of environmental duties are detailed in the Environmental [SSP016](#).

Marine services

Peel Ports Group are required to facilitate Marine Services within their areas of jurisdiction. Respective Ports have identified and implemented reasonably practicable measures to regulate the safe conduct of these operations

Marine support services may be carried out by Peel Ports personnel, contractors engaged by Peel Ports Group and/or by other 3rd party operators. Certain activities are essential to support marine operations of the ports. Where a Peel Ports owned terminal is located in an SHA that is not operated by Peel Ports Group, then the terminal will ensure that it's procedures complement those of the SHA. Marine services identified as requiring control and/or consent measures includes, but is not limited to:

- Dredging Works
- Commercial vessel Mooring operations
- Bunkering operations
- Diving operations
- Hot Works
- Dormant/ Abandoned Vessel management

Ports and terminals follow local SOPs/LWIs for the control of these activities.

Please refer to Port specific SOPs, MSMS Volume 2- section 10 - Marine Services.

Leisure craft engagement

Peel Ports Group engages regularly with the local leisure communities at individual port level to discuss marine safety. As a minimum, an annual leisure committee meeting is held to facilitate discussion on safety matters pertaining to that port. All changes and proposals that may have an impact on leisure users shall as far as practical be subject to local consultation. Ports each have their own SOP in place in the MSMS Volume 2 if applicable.

Consultation with external stakeholders

This is the process of communication, discussion, feedback and publication of the key control measures, the MSMS and policies. Consultation should always be with affected stakeholders and can be done via various means. It can be to notify stakeholders of relevant port and marine safety information, changes to procedure and policy, changes to regulations, or changes to the port's key marine safety control measures. Stakeholders may be internal staff or external groups. Groups can be setup specifically for certain consultations e.g. HAZID, or changes to Pilotage Directions, or they may use already established liaison groups such as the Port Terminal Liaison Committees.

Some forms of Consultation are statutory such as changes to Pilotage or General Directions and Byelaws, Marine Licence applications, harbour works licensing, changes to port dues and charges.

Consultation should be recorded and minutes recorded.

All ports shall establish as a minimum the following external consultation meeting:

Meeting	stakeholders	Topics covered
Port Users meeting Management Committees (6 Monthly)	Senior Marine Managers, Pilot Reps, Towage, Agents, Line handling, principle port users / terminal operators	Representatives for pilotage, towage, shipping agents, boatmen services and the Principal Port Users (for ports), or the Terminal Operator form these committees. The main objective of these committees is to discuss marine safety issues, potential changes to procedures or legislation, incident trends, changes to assets and infrastructure
Leisure Community Annual Meeting (Annual)	Senior Managers Marine Operations, Leisure Users reps	A formal annual Leisure Community meeting should be held at the respective ports to facilitate discussion on safety matters pertaining to that port. This should include a safety presentation by the Ports Marine Team. Similarly, these meetings are to discuss marine safety issues and to discussed potential changes to procedures and legislation, incident trends, events, or changes to assets and infrastructure.

Competence Assurance & Marine Training

The competence of employees is an essential element in the management of risk.

Training and Competence

The Training Competency and Standards Committee (TCAS) which reports direct to the GHM will oversee the Marine Training requirements matrix, setting the minimum training and revalidation criteria and ensuring training is provided to an appropriate standard for all marine staff. This shall be a combination of statutory training for certain functions and recommendations by the TCAS. TCAS is made up of representatives of all Group Ports' marine functions. TCAS discussions will concentrate on strategic issues or on-going work-streams/projects, as required. The TCAS working group recommendations and requirements will be discussed and endorsed at the MMT where any additional projects will be defined and allocated to appropriate staff.

Working Group information, recommendations, etc. will be further discussed in MMT where projects will be defined. The aim is to ensure that training, competency and standards within Marine are maintained and improved in order to remain fit for purpose in support of the provision of Marine services.

The TCAS committee will:

- Take strategic direction from MMT and the Marine Management Team Meetings process;
- Monitor the training plan to ensure its effectiveness and that training, competency and standards are being appropriately assessed, controlled (mitigated) and managed;
- Maintain the marine standards matrix in discussion with the Group Head of learning and development.
- Review and propose amendments and improvements to the training records system.
- Consider when training information, available courses, etc., can be shared with other Ports/Departments, both Peel and non-Peel, in order to generate mutual benefits.

- Review all communication channels between Ports and ensure relevant information concerning training, competency and standards is disseminated;
- Ensure consistency in the application of the Training across the Ports.
- Review and assist in the development of new and existing operational training systems, policies, procedures and safe systems of work;
- Undertake training, competency and standards work and projects as directed by GHM.

Task Changes

Changes to operational systems and/or safety critical tasks or activities will be considered when Employees transfer to different operating functions, tasks or work locations, or where they are required to take on new responsibilities or to deputise for an employee performing a different activity.

MSMS Performance & effectiveness Monitoring

Performance of the MSMS and its effectiveness

Peel Ports Group ensures safety performance is regularly reported, emerging trends analysed, and improvements initiated through the Group Marine SAP Incident management system (Power-BI). Performance monitoring is reviewed at Monthly MMTs and Quarterly by the DP. Safety performance will be an agenda item for the Group Environmental Health and Safety Board. Where KPI indicate failure to perform then the MMT shall agree appropriate corrective actions.

Performance and effectiveness of the MSMS measured through the following methods:

- Accident/Incident tracking
- Quarterly Internal audits
- 3 yearly independent verification audits by the DP for MCA Compliance Check.
- Accident/Incident investigation performance
- DP quarterly and annual marine safety monitoring and Board reports
- (as a minimum) Publish a 3-yearly safety plan (PMSC GTGP 2.3)
- Publicly reporting on PMSC performance annually (PMSC GTGP 2.3.1 & 5.2.1))
- Periodic MCA Health Checks
- Contractor Performance Monitoring
- Enhancement tracker closure performance

The following performance monitoring techniques and tools shall be utilised:

- A combination of Key Performance Targets (KPT) and Key Performance Indicators (KPI) will be used to provide an indication of overall safety performance;
- Target time compared to implementation time of safety measures;
- How effective were the measures in improving safety;

Marine incident Database- SAP Incident Management

Marine accident/incident and investigation data is recorded in SAP. Data is monitored and reported through Power Bi. Each Port will input marine accident data into the SAP Incident/Accident tracker which produces a continuous record of accident reports. This data is used to:

- Provide safety assurance, to Port Management (local and Group)
- Identify trends which may have adverse impacts on safety performance
- Assist in the formulation of corrective actions to arrest any trends

This is explained in further detail in [SSP011](#).

Key Performance Targets

The following Key Performance Targets are used:

- Very Serious and Serious accidents per 1000 vessel movements.

Key Performance Indicators

The following Key Performance Indicators are used:

- Accident causes;
- Accident ratio to number of commercial vessel moves
- Aids to Navigation maintenance and repair;
- Any non-compliance with IALA standards on a 3-year rolling programme;
- Marine Safety management System:
- Any non-compliance with a MSMS procedure.
- Full completion of the monthly Accident Reports by the 5th of the following month;
- To complete the following Safety Management processes within the stated timescales;
- All Marine Investigations in the timescale set in the MSMS;
- All required audits and non-compliance corrective actions in the agreed timescales.
- To achieve 100% completion of all necessary risk assessments as determined by the MSMS process.

This is explained in further detail in [SSP010](#).

Accident Incident Investigation & Enforcement

Accident's, near misses, corrective actions and risk assessments are recorded within the SAP. Peel Ports Group Marine Investigation and Enforcement [SSP011](#) provides further detail and Ports have their own SOPs to follow.

A '**marine accident**' is defined as any marine casualty or any marine incident. An accident also includes serious injuries.

A '**marine incident**' is an event or sequence of events which has occurred directly in connection with the operation of a ship that endangered, or if not corrected would endanger the safety of a ship, its occupants or any other person or the environment. '**Near misses**' are marine incidents.

Every accident needs to be investigated and analysed, the direct and root causes identified. Accidents where lessons can be learned will be discussed at the relevant forum e.g. Local Liaison Committees and MMT and if necessary a LI Proforma completed and distributed.

The Group Harbour Master may require a formal investigation depending on the nature of the accident, this is defined in [SSP011](#). A report will be compiled to capture the investigation findings, conclusion and any recommendations. If the MAIB indicate they will be investigating, the level of any port formal investigation will be decided by the GHM. If an offence has been committed then enforcement action should be initiated

The MCA is notified if there is a deficiency which may affect the safe navigation of the vessel, or which may pose a threat of harm to the marine environment as per The Merchant Shipping (Port State Control) Regulations 2012 and MGN 564. This is explained in further detail along with agreed KPIs in [SSP011](#).

Independent Compliance Assurance

Internal audits

The internal audit schedule shall define the frequency for auditing the management system. These audits shall determine whether ports comply with the MSMS:

The audits, along with the management review, ensure the on-going effectiveness of the MSMS and assess compliance to legal and other requirements. The internal audit format, standard and method are managed by the Group Marine Services Team. Auditors will be briefed on the format and conduct of their audits and provided with templates and assistance. Audit training will be provided for all staff involved in the Audit process. New auditors will shadow an experienced auditor for their first audit before conducting an audit by themselves.

Audit guidelines are in [SSP004](#).

An Internal Audit is a means of exposing an established procedure or operation to a high-level review, thereby to ensure that the port is complying with the MSMS policies and procedures. The Internal Audit is not an in-depth survey and is not as detailed as the external Designated Person audits. The internal audits are designed to provoke review and discussion between the auditee and the auditor to assist the port or terminal in identifying and recording any areas for improvement. It shall provide the Port or terminal with a good indication of how well they are managing to implement the MSMS. It shall also highlight to the Port or terminal and the GHM any areas of the MSMS which require updating or further clarity.

Independent Audits/Reviews by the Designated Person

The DP will provide Independent assurance to the Duty Holder that the MSMS is working effectively and that it is compliant with the PMSC. This will be achieved by a three-yearly audit of the operational compliance with the MSMS and additionally will take the form of a 'gap analysis' of the compliance of the MSMS with the current PMSC. The Independent DP Audit will be conducted by Peel Ports Group appointed DP. The DP will produce an audit report identifying any shortfalls and/or deficiencies in the MSMS. The Audit will assess the continued provision of an appropriate and effective Marine SMS and Peel Ports Group' overall compliance with the requirements of the Port Marine Safety Code.

Ongoing Internal Reviews

To provide a measure of ongoing activities, safety development initiatives and performance against key measures, a quarterly monitoring summary is provided by the Designated Person. The calendar year is summarised into four quarters (January to March, April to June, July to September, and October to December). The summary report is provided in the month following completion of each quarter. From this monitoring activity the following sections are addressed:

- Enhancement plans;
- Accident/Incidents records;
- Accident/Incident reports closure; and
- Marine risk assessments.

Enhancement items are drawn primarily from external and internal audit findings. Progress and closure of enhancement items are monitored at a Group level through the Group Enhancement Tracker which summarises all port specific enhancement items.

Review of relevant external information

Performance monitoring is reviewed at Monthly MMTs and Quarterly by the DP. Safety performance will be an agenda item for the Group Health and Safety Board. Audits, along with the management review, ensure the on-going effectiveness of the MSMS and assess compliance to legal & other requirements.

Safety Digests, MAIB reports and MCA circulars are included for review during MMTs.