

PART C

CHAPTER 4

GENERAL PRINCIPLES AND RECORD KEEPING

4.1 General

4.1.1 Definitions

Surveys

The legal basis for surveys is described in Parts A & B under each specific survey type. Surveys may be undertaken by the Agency's surveyors or by surveyors from the classification societies or other certifying authorities, such as MECAL. They cover specific items depending on the type of survey. Surveys require close examination of the construction and/or equipment or operations on board a ship to ensure compliance with the relevant regulations. Although it may not be practical to examine every component of a ship, it should be an examination of sufficient depth to ensure the *vessel complies with each requirement*.

Vessel Inspections

Inspections, usually unscheduled, are intended to check on vessels in between surveys and also on aspects that are not covered by survey. They may also cover vessels that are not subject to a mandatory survey regime. An inspection may look at the whole or specific parts of the vessel, its structure, equipment or operation on a sample basis. It gives a measure of the safety and pollution prevention standard of the vessel concerned. Whilst guidance may be provided, the scope and depth of the inspection is determined by the professional judgement of the surveyor. The surveyor may look at the ship in more depth in response to issues found in an inspection.

4.1.2 Generally, a survey differs from an inspection in the level of detail observed and the scope is fixed (determined by survey items), as well as the fact that a survey leads to the issue of some form of statutory certification (but see **Part B Chapter 1.1.4**).

4.1.3 The certification requirements depend on a number of factors including relevant UK ship class (see 4.1.4 below), ship type, ship size (length, gross tonnage), operational features e.g. carriage of oil or chemicals and number of passengers carried.

4.1.4 The UK has, for many years, classified its ships in terms of the ships operations. More recently, the EC has also introduced classes of ships in respect to domestic passenger ships. Annex 1 to this Chapter is an at-a-glance

guide to ship classification and includes cross-references between UK and EC requirements.

4.1.5 Guidance on inspection issues are described in a separate publication – ‘Instructions to Surveyors – Inspection Policy (MSIS 38)’.

4.2 File Records

4.2.1 A record for Quality Management purposes is anything that shows how you are doing your job or following a process, or evidence of conformity to requirements as laid out in legislation, MCA procedures, or local desk instructions.

4.2.2 The “Records Management Guide” (Doc 50) contains general information regarding registered files. This guide can be found on the [Strategy & Finance](#) link on the M-Net ([Corporate Developments](#) / Records Management/ Records Management Guide). Records are auditable and the retention periods are detailed in the guide. Further detailed guidance on what is expected with regard to survey file completion is described below.

4.2.3 For newbuild and flag-in vessels, all the relevant files should be raised from [Records Management](#). A list of the relevant files is contained in the “[MCA Theme List](#)” on the [Records Management](#) microsite.

4.2.4 The lead surveyor must complete the relevant files. Surveyors should ensure that copies of all survey reports and certificates which they prepare and issue are placed on the relevant CM file. Details of minimum documents to be filed are indicated under each process based survey instruction described in Part A.

4.2.5 For renewal or annual surveys, or where significant changes are found to have been made, these changes must be recorded in the relevant subject files. Where surveys are part held, details of completed survey items and items yet to be surveyed must be documented, see [paragraph 4.7 of this chapter](#) on the use of survey aide memoires.

4.2.6 For dual certificated vessels e.g. small passenger vessel and small commercial vessel, the survey documents relating to each certificate must be filed in the appropriate file.

4.2.7 Details of documents to be filed for each survey type are indicated in Part A of these instructions.

4.3 Guidance for Completion of S & I Files

4.3.1 General Guidance

4.3.1.1 A CM file is intended to provide a sequential technical record of the subject matter of the file. This record is split into two, the technical documentation (documents - on the right) and the internal comments and actions (minutes - on the left).

4.3.1.2 The file is not a financial record, and as such fee documents should not be placed on file, unless specifically requested, although minutes may refer to job numbers for completeness and cross reference.

4.3.2 Minutes

4.3.2.1 Minutes are internal documents placed on the left of the file, the purpose of which is to give an overview of the current status and issues for the benefit of colleagues and managers. Minutes should provide one or more of the following:

- a very short outline of the survey;
- brief summary of any significant issues during or following survey;
- request for further action or explain why a minute is there;
- include comments about a specific decision or policy;
- explain why the file should be seen and actioned by relevant person(s); and
- provide reference to relevant documents (and pockets).

4.3.2.2 The variable nature of minutes is such that a single standard format is not appropriate – an example is included at Annex 2 for guidance. The minute should be kept as short as possible consistent with the above. It may be hand written provided it is legible. It should be signed and dated.

4.3.2.3 A minute should be placed on the file every time there is an action or a change to record. It is not necessary to add a minute where a file has merely been used for reference.

4.3.2.4 Minutes should be numbered starting from 1 adjacent to the cover, with sequentially numbered minutes added on top face up (punched hole on right). Any blank sides or part pages should be scored out to indicate that nothing has been added in between. Short handwritten minutes are acceptable and can be added to blank sides or part pages so long as they remain sequential, are legible and clearly numbered.

4.3.2.5 Addressees on file minutes should be listed in the order they are intended to be noted. For files leaving marine offices the first addressee on the minute should be the SIC/AOM.

4.3.2.6 Minutes should carry the appropriate security marking in accordance with Departmental procedures.

4.3.3 Documents

4.3.3.1 Documents, placed on the right, can be anything technical that is relevant to the subject matter of the file including copies of reports and

certificates. These should include all essential records that are necessary to prove our accountability and continuity. This may be:

- details of something important or historical
- background information relating to concerns or comments on any specific survey or inspection item that will be useful for subsequent or future surveys;
- details of items credited or outstanding for completion of specified survey cycle;
- internal or external emails relevant to the technical issues, such as policy decisions.

The relevant chapters of the Instructions to Surveyors for Survey, Inspection and Audit each set out the minimum documents required.

4.3.3.2 Files should not contain any paper that is not required to complete the technical record such as trivial content, blank aide memoires, drafts (unless it has important notes from senior officials), duplicates, advertising materials etc.

4.3.3.3 Where a large number of documents are accumulated over a survey cycle, it may be beneficial to add a 'tab' to separate documents pertaining to different survey cycles.

4.3.3.4 Numbering of documents should start at 1 at the back of the file with sequentially numbered documents added on top.

4.3.4 Plan Pockets

4.3.4.1 Plan pockets are attached to the back of the file to hold bulky documents or plans. These are only required where such bulky items exist. These pockets can become detached so they should be labelled with the file number and their contents. Multiple pockets should each be numbered. Where plan pockets add significant weight to the file, the file and pockets should be bound together for transport.

4.3.5 Corrective Action

4.3.5.1 Where a file is found not to have followed the above, do not remove items. If the file has NOT been numbered, then the file may be re-ordered to comply with the above if this is straightforward to do. Alternatively a divider is added on left or right as appropriate and a note added to the minute to the effect that numbering starts from the points indicated. This provides clarity, but avoids having to rework a complex file.

4.3.6 Maximum Thickness

4.3.6.1 As a guide, the main file should not exceed 2.5cm in thickness. This is to avoid it becoming vulnerable to wear and tear which could result in loss of papers. This is only a guide and many technical files are thicker than this without any apparent damage. Where a file does show signs of significant damage a new cover should be ordered and a new "part" opened. The new

cover should be placed around the existing papers preserving their order and the file transfer record on the front of the file.

4.3.6.2 When a new Part is opened, the new file numbering of minutes and documents should be restarted from 1.

4.3.7 Audit of Records

4.3.7.1 The “Records Management Guide” contains general information regarding registered files. This guide can be found on the Strategy and Finance/ Corporate Developments/ Records Management link on the M-Net. Records are auditable and the retention periods are detailed in the guide. Note that many files may also be requested as part of a Freedom of Information request.

4.4 File Review

4.4.1 Area Operations Managers will review a proportion of files following their completion. A minimum of 10% of completed files are to be reviewed annually. Key criteria for deciding how many and which files to review are:

- reviews to cover all surveyors in the office
- experience of the surveyor
- complexity of the survey
- frequency of mistakes found

4.4.2 Reviews should be increased if there is evidence that files are not being completed in a timely and proper manner. If necessary full term certificates should not be signed and issued until completed files are presented with the declaration, but in doing so Managers should ensure that the issue of a new certificate is not unduly delayed where an existing certificate is expiring. The Merchant Shipping (Survey and Certification) Regulations **2015**, Regulation **17** (2), provision to endorse an existing certificate when the survey has taken place, but the new certificate cannot be placed on board before its expiry, is a legitimate tool for ensuring that the owner has valid certification on board. However, it should not be used solely to give Managers more time to carry out file reviews.

4.4.3 As a guide, the file review should include the following:

- the correct file used
- the pages are numbered correctly
- all relevant documents are on file (see Part A of these I to S)
- file minute or note completed and signed

4.4.4 Upon completion of a file review, the file should be endorsed and an auditable record kept of that review (e.g. spreadsheet or noting file CM number in diary).

4.5 Recording of Deficiencies

4.5.1 A Report of Inspection/Survey (MSF 1602) must be completed and input to SIAS to record that the survey has been carried out. Where minor deficiencies are identified, these should be detailed on the Report of Inspection/Survey (MSF 1603) and, the owner and/or operator should be informed of the timescale for rectification agreed (and logged accordingly on the MSF 1603). Depending on the nature of the deficiency or deficiencies found the certificate may still be issued or endorsed, or enforcement action taken, at the discretion of the attending surveyor. In case of uncertainty, reference should be made to the AOM/SIC.

4.5.2 Deficiency codes from the list available on SCMS under 'PSC' or from the Inspection Branch microsite should be used.

4.5.3 Deficiencies found as a result of the survey should be recorded on the report form prefixed with letter "S". Deficiencies found as a result of an inspection in conjunction with survey prefixed with "I".

4.5.4 The deficiency recording and rectification process is the same for surveys as for inspections. Further guidance on the completion of MSF 1602/3, deficiency rectification and notification of Class related issues can be found in MSIS 38 Part B Chapter 1 – Inspection Policy - Considerations for Inspections.

4.6 Surveyors Notes

4.6.1 Surveyors should take accurate notes during surveys. The purpose of taking accurate notes during surveys is to enable the surveyor to refer to them when writing up survey files. It also provides the surveyor with their own personal detailed record for reference should the need for future clarification arise.

Survey notes are not required to be placed on the file, but surveyors are strongly recommended that they keep their survey notes for the period of the survey cycle to which they relate.

4.7 Survey Aide Memoires

4.7.1 The purpose of aide memoires is to assist the surveyor in covering all the aspects of a statutory survey. When part surveys are held, elements of the survey which have been completed should be clearly indicated and initialled by the surveyor. This will enable the surveyor completing the part held survey to see what elements are outstanding and avoid survey items being missed. In such cases, on completion of survey or part held survey the aide memoire should be placed on the relevant survey file.

4.8 Videos and /or photographs

4.8.1 When videos or photographs are taken by surveyors during surveys, the date and/or time function should be "ON". When, in the surveyors view

photographs form an essential record of a survey, the photographs should be placed in the relevant file.

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Annex 1 - UK Ship Classification & EU Equivalent

PASSENGER SHIPS ENGAGED ON INTERNATIONAL VOYAGES

Class	Description	EC Class
I	Ships engaged on voyages any of which are long international voyages.	N/A
II	Ships engaged only on voyages any of which are short international voyages.	N/A

PASSENGER SHIPS NOT ENGAGED ON INTERNATIONAL VOYAGES

Class	Description	EC Class
II(A)	Ships engaged on voyages of any kind other than international voyages, which are not ships of Classes III to VI(A) as defined in the Merchant Shipping (Passenger Ship Construction: Ships of Classes III to VI(A)) Regulations 1998	A B
III	Ships engaged only on voyages in the course of which they are at no time more than 70 miles by sea from their point of departure and not more than 18 miles from the coast of the United Kingdom, and which are at sea only in favourable weather and during restricted periods;	B <i>(restricted)</i>
IV	Ships engaged only on voyages in Category A, B, C or D waters;	N/A
V	Ships engaged only on voyages in Category A, B or C waters;	N/A
VI	Ships engaged only on voyages with not more than 250 passengers on board, to sea, or in Category A, B, C or D waters, in all cases in favourable weather and during restricted periods, in the course of which the ships are at no time more than 15 miles, exclusive of any Category A, B, C or D waters, from their point of departure nor more than 3 miles from land;	C <i>(restricted)</i>
VI(A)	Ships carrying not more than 50 passengers for a distance of not more than 6 miles on voyages to or from isolated communities on the islands or coast of the United Kingdom and which do not proceed for a distance of more than 3 miles from land; subject to any conditions which the Secretary of State may impose.	D <i>(restricted)</i> C <i>(restricted)</i> B <i>(restricted)</i>

EU DOMESTIC PASSENGER SHIP CLASSIFICATION

Class A	means a passenger ship engaged on domestic voyages other than voyages covered by Classes B, C and D
Class B	means a passenger ship engaged on domestic voyages in the course of which it is at no time more than 20 miles from the line of the coast, where shipwrecked persons can land, corresponding to the medium tide height.
Class C	means a passenger ship engaged on domestic voyages in sea areas where the probability of exceeding 2.5m significant wave height is smaller than 10% over a one-year period for all-year round operation, or over a specific restricted period of the year for operation exclusively in such period (e.g. summer period operation), in the course of which it is at no time more than 15 miles from a place of refuge, nor more than 5 miles from the line of the coast, where shipwrecked persons can land, corresponding to the medium tide height.
Class D	means a passenger ship engaged on domestic voyages in sea areas where the probability of exceeding 1.5m significant wave height is smaller than 10% over a one-year period for all-year round operation, or over a specific restricted period of the year for operation exclusively in such period (e.g. summer period operation), in the course of which it is at no time more than 6 miles from a place of refuge, nor more than 3 miles from the line of the coast, where shipwrecked persons can land.

(EC Sea areas around the UK defined in MSN 1747)

"long international voyage" means a voyage from a port in one country to which SOLAS applies to a port in another country or conversely; and which is not a short international voyage;

"short international voyage" means an international voyage in the course of which—

(a) a ship is not more than 200 miles from a port or place in which the passengers and crew could be placed in safety; and

(b) the distance—

(i) between the last port of call in which the voyage begins and the final port of destination; or

(ii) of the return voyage

does not exceed 600 miles, where the final port of destination is the last port of call in the scheduled voyage at which the ship commences its return voyage to the country in which the voyage began;

"Category A, B, C or D waters" means the waters specified as such in Merchant Shipping Notice No. MSN 1837 and are defined as:-

Category A is narrow rivers and canals where the depth of water is generally less than 1.5 metres;

Category B is wider rivers and canals where the depth of water is generally 1.5 metres or more and where the significant wave height could not be expected to exceed 0.6 metres at any time;

Category C is tidal rivers and estuaries and large, deep lakes and lochs where the significant wave height could not be expected to exceed 1.2 metres at any time;

Category D is tidal rivers and estuaries where the significant wave height could not be expected to exceed 2.0 metres at any time.

These are not to be confused with the **Sea Areas** defined in Merchant Shipping Notice No. MSN 1747 for the purposes of defining areas for the application of the MS (Passenger Ships on Domestic Voyages) Regulations 2000.

"restricted period" means a period falling wholly within the following limits-

(i) from the 1st April to 31st October, both dates inclusive; and

(ii) between one hour before sunrise and one hour after sunset in the case of ships fitted with navigation lights conforming to the collision regulations and between sunrise and sunset in the case of any other ships;

"sea" does not include any waters of Category A, B, C or D.

UK NON-PASSENGER SHIP CLASSIFICATION

Class VII	ships (other than ships of Classes I, VII(A), VII(T), XI and XII) engaged on voyages any of which are long international voyages;
Class VII(A)	ships employed as fish processing or canning factory ships, and ships engaged in the carriage of persons employed in the fish processing or canning industries;
Class VII(T)	tankers engaged on voyages any of which are long international voyages;
Class VIII	ships (other than ships of Classes II, VIII(T), IX, XI and XII) engaged only on short international voyages;
Class VIII(T)	tankers engaged on voyages any of which are short international voyages;
Class VIII(A)	ships (other than ships of Classes II(A) to VI(A) inclusive, VIII(A)(T), IX, IX(A), IX(A)(T), XI and XII) engaged only on voyages which are not international voyages, (includes Small Commercial Vessels);
Class VIII(A)(T)	tankers engaged only on voyages which are not international voyages;
Class IX	tugs and tenders (other than ships of Classes II, II(A), III, VI and VI(A)) which proceed to sea but are not engaged on long international voyages;
Class IX(A)	ships (other than ships of Classes IV to VI inclusive) which do not proceed to sea;
Class IX(A)(T)	tankers which do not proceed to sea;
Class X	fishing vessels;
Class XI	sailing ships (other than fishing vessels and ships of Class XII) which proceed to sea;
Class XII	pleasure vessels of 13.7 metres in length or over.

Annex 2 - Example of survey minute

Minute Number ...

From:

Ref: CM/027/0006

SHIP:

Date:

AOM/ SIC - MO Everywhere

Survey: M.V [*Name of Vessel*] – Safety Equipment Certificate
(SEC) Annual Survey

Date of survey:

Location:

Issue/Summary: The subject vessels SEC anniversary date is the 12 December and the undersigned attended the vessels at [*Location*] on 04 January 2011 to undertake the annual survey.

- A large number of Straub type couplings fitted to the vessels fire main located on the main deck would appear to have been damaged by frost and required replacement before departure. As Class were on board completing their annual surveys, this was verified by them on completion.
- The annual service of the vessels rescue boat in accordance with MSN1803 would appear not to have carried out in 2010. This has now been carried out in Varberg-Sweden by an ILSTO and the owner's representatives on board were reminded that the requirements of MSN1803 also apply to rescue boats and there planned maintenance procedures should reflect this requirement.
- Other deficiencies raised during the survey are recorded on the report of inspection and all have been confirmed closed by the owner on the 12 January 2011.
- On completion of a satisfactory survey, the SEC Periodical survey has been endorsed accordingly

Recommendations: This file forwarded for information and noting prior to sending to Registry to PA.

Consideration/Detail: Fees for this work covered by [*insert job number*]

Document (Documents on right side of side of file to be sequentially numbered)	Doc No	Remarks
Audit Aide Memoire MSF 5505		
Inspection Report MSF1602 & MSF 1603		
Copy of Declaration MSF		
Copy of original SEC		
Copy of endorsed certificate		
Copy MSF 1102		
MED Non Compliance Certificate (Post 1999)		

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