



SUB-COMMITTEE ON STANDARDS OF  
TRAINING AND WATCHKEEPING  
39th session  
Agenda item 5

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## TRAINING FOR SEAFARER SAFETY REPRESENTATIVES

### Guidance on the training of a ship safety representative

Submitted by the International Transport Workers' Federation (ITF)

#### SUMMARY

<b>Executive summary:</b>	This document suggests guidance for the training of a ships safety representative
<b>Action to be taken:</b>	Paragraph 11
<b>Related documents:</b>	MSC 82/24, MSC 82/21/2; MSC-MEPC.2/Circ.3, ISM Code and the ILO Maritime Labour Convention

#### Introduction

1 At MSC 82, following considerations of document MSC 82/21/2 (New Zealand, South Africa and Philippines) it was agreed to include, in the STW Sub-Committee's work programme, a high priority item on 'Training for seafarer safety representatives'.

2 The sponsors of paper MSC 82/21/2, believe that promoting safe behaviour for a safety culture on board ship requires the involvement of all personnel, ashore and afloat and the objectives of the ISM Code can only be fully met if the seafarer, both officers and crew, are considered as an essential and integral element of the safety culture and part of the safety management system.

3 The International Labour Organisation (ILO) in a resolution of the General Conference in 2006 emphasised the need to promote the establishment of shipboard safety committees and the appointment of crew safety representatives. This resolution also recognized that the occupational safety and health of seafarers and the risks they face on board vessels are inextricably linked to the effective implementation of the International Safety Management (ISM) Code.

4 The IMO has expressed its clear intent for all seafarers to have input and responsibility for the safety culture on board ship in MSC-MEPC.2/Circ.3 appendix 2, Guidelines of the Basic Elements of a Shipboard Occupational Health and Safety Programme, and to ensure this essential requirement for an effective onboard safety committee, safety officer and safety representative(s) working closely with management ashore. Clearly basic training in this area is essential for all the participants in this process and as health and safety is most effective from a bottom up approach it is appropriate we address the ships safety representative as a priority.

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## **Training Requirements**

5 Whilst the training for the ships safety representative should not be onerous, for a valuable contribution to the onboard safety committee the safety culture and the safety management system, they must be given an appreciation of the principles governing occupational safety and health. They should also understand the concept for a safety culture onboard and be able to communicate clearly with both the senior officers and fellow crewmembers in respect to their duties.

6 We are conscious that some national flags, ship owners and managers have in place comprehensive structures for onboard health and safety including the monitoring of safety committees and criteria for safety representatives; however recent incidents have shown that the acceptance and implementation of the safety culture is far from universal. Insurance spokesmen comment weekly on the dramatic increase in onboard accident claims and attribute much of this to lack of training and the appreciation of unsafe practices.

7 It is also appreciated that the competency for occupational health and safety does not lie entirely with the IMO but also internationally with the ILO, and World Health Organization (WHO) and within the national legislation of the flag states. It must be noted that regulation 4.3.2 of the ILO Maritime Labour Convention 2006 provided that 'each Member shall develop and promulgate national guidelines for the management of occupational safety and health on board ships', in addition applicable codes, guidelines and standards recommended by international organizations, national administrations and maritime industry organizations must be taken into account. It is therefore appropriate that any training for the ships safety representative take the form of guidelines based on MSC-MEPC.2/Circ 3 appendix 2, and whilst a requirement for each vessel, they should be non prescriptive in application.

8 MSC 83 agreed to instruct the Joint MSC/MEPC Working Group on Human Element to develop draft amendments to the ISM Code with the understanding that the intended scope of the amendments should be limited to those relating to requirements for seafarer safety representation. It may therefore be slightly premature to finalize the training requirements for ship's safety representatives before the amendments to the ISM Code have been finalized.

9 However, it would be appropriate to consider the skills required for a person to perform the duties as a ship's safety representative. In this context, an outline of the training in the skills that may be required of a ship's safety representative is set out in the annex.

10 ITF proposes that the Sub-Committee gives preliminary consideration to the skills required and await the outcome of the Joint MSC/MEPC Working Group on Human Element before finalizing the training requirements for ship's safety representative.

### **Action requested of the Sub-Committee**

11 The Sub-Committee is invited to consider the above proposal and take action as appropriate.

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**ANNEX****TRAINING IN THE SKILLS REQUIRED TO PERFORM THE DUTIES OF  
A SHIPBOARD SAFETY REPRESENTATIVE**

1 The ships safety representative appointed under the provisions of the relevant national and international codes and conventions, before being assigned their shipboard duties, should have training in the required skills relating to:

- .1 understanding of occupation and health safe working practices;
- .2 identification of job safety and hazards;
- .3 familiarity with the safety equipment available and its correct use;
- .4 full understanding of established standard operating procedures and safety rules;
- .5 understanding of required inspections and maintenance of personal protective equipment to ensure it is in good working order;
- .6 appreciate the importance of reporting injuries or accidents to supervisors promptly;
- .7 assisting in the development of standard operating procedures that incorporate safe working practices;
- .8 participation in setting health and safety objectives and performance;
- .9 develop communication skills to ensure a full understanding of the importance of good working practice by crew and enumerating possible concerns to the supervisor of safety committee;
- .10 evaluate operate procedures and make relevant suggestions for improvement;
- .11 participate in the development of solutions to safety and health problems onboard;
- .12 assist in implementing and evaluating occupational health and safety training activities; and
- .13 involvement in analysis of injury and accident reviews.

2 The training process for the ships safety representative should be clearly defined within the documentation of the companies ISM Code but not incorporated into the familiarization training. Training should be conducted by a person fully qualified to instruct in occupational safety and health and with the ability to assess the representative's ability to fulfill their responsibilities. Copies of all the relevant international and national guidelines, codes and regulations should be available onboard, for the ships safety representative, in the language understood by the majority of the crew.

3 The company should have an ongoing training program and material should be available at all times to ensure the representative is kept up to date with occupational health and safety legal requirements, administration warnings and advice and company operational polices.

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