



Flagship

A Safety Management System for Members of the Passenger Vessel Association

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Welcome to PVA Flagship SMS

The **PVA Flagship SMS** is an alternative Safety Management System (SMS), created by the Passenger Vessel Association (PVA) specifically for members to utilize in implementing their own SMS.

A safety management system is a structured and documented system enabling both shore side and vessel side personnel to effectively manage safety through a proactive culture of continual improvement. Overall, it is the commitment, competence, attitudes, and motivation of all personnel at all levels within a company that will determine the successful implementation of any safety management system.

The **PVA Flagship SMS** is tailored for domestic passenger and small passenger vessels. Each PVA member in good standing electing to participate in "**Flagship**" must advise PVA of their decision to participate and will then receive a certificate citing their participation in the **PVA Flagship SMS**.

Within the **PVA Flagship SMS**, the company must establish and document the following:

1. Management commitment
2. Safety and environmental protection policy
3. Organizational structure to define levels of authority and lines of communication between and among shore and vessel personnel
4. Designated Person(s) role and responsibilities
5. Master's authority
6. Compliance with mandatory rules, regulatory and reporting requirements
7. Functional safety and operational requirements
8. Procedures to prepare for and respond to emergency situations
9. Event tracking procedures
10. Maintenance procedures
11. Document control
12. Measurement, analysis and improvement, including audits and reviews

Acknowledgement:

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Table of Contents

Definitions	5
Chapter 1: Introduction	7
Overview	7
Purpose.....	7
Responsibility	7
Objectives	7
Requirements.....	7
Action Items	8
Chapter 2: Safety and Environmental Protection Policy.....	9
Overview	9
Responsibility	9
Requirements.....	9
Action Items	9
Chapter 3: Company Responsibility and Authority.....	10
Overview	10
Responsibility	10
Requirements.....	10
Action Items	10
Chapter 4: Designated Person.....	11
Overview	11
Responsibility	11
Requirements.....	11
Action Items	12
Chapter 5: Master’s Responsibility	13
Overview	13
Responsibility	13
Requirements.....	13
Action Items	13
Chapter 6: Resources and Personnel	14
Overview	14
Responsibility	14
Requirements.....	14
Masters.....	14
Personnel	14
Relevant Rules	15
Training	15
Communication.....	15
Action Items	15



Chapter 7: Vessel Operating Procedures..... 16
Overview 16
Responsibility 16
Requirements..... 16
Action Items 16

Chapter 8: Emergency Preparedness 17
Overview 17
Responsibility 17
Requirements..... 17
Action Items 17

Chapter 9: Reporting Procedures..... 18
Overview 18
Responsibility 18
Requirements..... 18
Action Items 18

Chapter 10: Maintenance 19
Overview 19
Responsibility 19
Requirements..... 19
Action Items 20

Chapter 11: Documentation 21
Overview 21
Responsibility 21
Requirements..... 21
Action Items 21

Chapter 12: Company Verification and Review 22
Overview 22
Responsibility 22
Requirements..... 22
Action Items 22



Definitions

The following terms and abbreviations are used within the *PVA Flagship SMS*:

Audit – An objective assessment of the SMS to determine how well the management system is understood, implemented, and effective at achieving its stated objectives as communicated by Top Management. Audits are intended to promote continual improvement of the management system.

Audit Finding – A nonconformity identified through objective evidence during an audit of the management system.

Audit Observation – A situation observed during an audit of the management system that suggests the potential for a nonconformity to exist. An observation may or may not be based on objective evidence.

Auditor – An auditor is an individual who accumulates and evaluates evidence to report on the degree a company's assertions and actions comply with an established set of procedures or standards (criteria). This person may function as an employee or an independent professional. When working for an organization, he or she is usually referred to as an internal auditor. He or she often conducts periodic audits that may encompass several areas on a rotating basis. An external auditor is an individual working as a representative of a certifying body.

Continual Improvement – The primary objective of the SMS with respect to performance in the areas of safety and pollution-prevention, to learn from observations, actions, accidents, and lessons learned to correct processes and further increase safety. Numerous tools are provided within the SMS to identify suitable continual improvement opportunities.

Corrective Action – Action that is taken in response to an event that seeks to address the “root” or basic cause of the problem.

Critical Equipment – Any equipment, machinery and/or systems which, in the case of sudden operational failure, could result in hazardous situations to personnel, the vessel or the environment; and any equipment, machinery, and systems providing stand-by arrangements that are not in continuous use are also considered critical equipment.

Designated Person (DP) – A person or persons designated in writing by top management who monitors the safety management system of the company and vessel and has:

- Direct access to communicate with the highest levels of the company and with all management levels ashore and aboard the company's vessel(s);
- Responsibility to monitor the safety and environmental aspects of the operation of each vessel; and
- Responsibility to ensure there are adequate support and shore-based resources for vessel(s) operations.

Document of Compliance – A certificate issued to a company that complies with the requirements of 33 CFR Part 96 or the International Safety Management Code.

Event – An unwanted occurrence, nonconformity, or “opportunity for improvement” (OFI).



PVA Flagship SMS

Event Reporting – The processes and procedures for reporting, analyzing, and determining appropriate corrective or preventive action for each reported event.

Hazardous Condition – Any condition that could adversely affect the safety of any vessel, bridge, structure, or shore area or the environmental quality of any port, harbor, or navigable water of the United States. This condition could include, but is not limited to, fire, explosion, grounding, leaking, damage, illness of a person on board, or a manning shortage.

Internal Audits – An annual company-lead review or assessment to verify whether safety management activities comply with the requirements of the safety management system.

Near Miss – An unplanned event that did not result in injury, illness, or damage – but had the potential to do so.

Nonconformity – means an observed situation where evidence indicates the non-fulfillment of a specified requirement or policy under the SMS.

Opportunity for Improvement (OFI) – A suggestion or recommendation that may improve a policy, a procedure, or enhance safety or pollution prevention interests.

PVA Flagship SMS– A term used interchangeably with “Safety Management System” for PVA member companies that use the Coast Guard approved/accepted Flagship framework to implement a safety management system.

Risk Assessment – A process for identifying hazards and assessing the risk (probability and consequence) posed by each.

Safety Management Certificate – A document issued to a vessel that signifies the company and the vessel's shipboard management operate in accordance with the approved safety management system. Note: A company must first obtain a Document of Compliance before a Safety Management Certificate can be issued.

Safety Management System – A structured and documented system enabling company and vessel personnel to effectively implement the responsible person's safety and environmental protection policies.

Top or Senior Management – The individuals who provide resources, delegate authority, and who coordinate, direct, and control a company.



Chapter 1: Introduction

Overview

Repeated analysis of casualty studies concluded that over eighty percent (80%) of all high consequence marine casualties may be directly or indirectly attributable to the “human element.”¹ These types of errors play a part in virtually every casualty, including those where structural or equipment failure may be considered the immediate cause.

Consequently, the Passenger Vessel Association (PVA), National Transportation Safety Board (NTSB), Congress, and the U.S. Coast Guard saw the need to emphasize vessel Safety Management System (SMS) practices to help minimize human errors or omissions.

Purpose

The purpose of the **PVA Flagship SMS** is to ensure safety of the vessel, safety of the crew and passengers, and environmental compliance, as well as explain the objectives and functional elements of a Safety Management System to illustrate the information required to fulfill the minimum requirements of a practical and functional SMS for PVA member vessels.

Responsibility

By adhering to the **PVA Flagship SMS**, the PVA Member Company shall establish procedures and instructions for key vessel operations concerning safety and environmental compliance. The implementation of the **PVA Flagship SMS** ensures that companies meet key safety management system objectives, as stated below.

Objectives

1. The primary objective of “**Flagship**” is to have PVA members operate in a proactive way to manage safety, protect the environment, and continually improve their operations.
2. The **PVA Flagship SMS** objectives for PVA member companies should:
 - Provide for safe practices in vessel operations and a safe working environment;
 - Assess all identified risks to its vessels, personnel and the environment and establish appropriate safeguards; and
 - Continually improve safety management skills of personnel ashore and aboard vessels, including preparing for emergencies related both to safety and environmental protection.
3. In many cases PVA members have policies and procedures in place to operate their vessels in a safe and environmentally responsible way. In those situations, **PVA Flagship SMS** provides an organized way to manage safe practices and seek continual improvement.

Requirements

The **PVA Flagship SMS** meets the functional requirements of 33 CFR Part 96 to develop, implement, and maintain a safety management system to ensure the safe operation of vessels.

To assist PVA members in organizing and implementing a safety management system, a sample manual has been developed that provides a framework to follow through the process. In addition, best practices and tools have been developed by members while building and implementing their safety management systems.



The ***PVA Flagship SMS Manual*** and ***PVA Flagship SMS Best Practice Guidance, Samples, and Tools*** can be obtained from the Passenger Vessel Association at www.passengervessel.com.

Action Items

1. Complete Chapter 1 template in the ***PVA Flagship SMS Manual*** or company specific equivalent.
2. Develop risk assessment tools at all levels (deck, shoreside management, senior management); sample risk assessments are found in the ***PVA Flagship SMS Best Practice Guidance, Samples, and Tools***.

Endnote:

1. C.C. Baker and A.K. Seah, "Maritime Accidents and Human Performance: the Statistical Trail." Paper Presented at MARTECH 2004, Singapore, September 22 – 24.



Chapter 2: Safety and Environmental Protection Policy

Overview

This chapter contains the Safety and Environmental Protection Policy statement (the “Policy”) that clearly defines the company’s responsibility and commitment to the ***PVA Flagship SMS*** and” implementation of the “Policy.”

Responsibility

1. Companies shall be committed to safety and environmental protection in all of its operations.
2. All company personnel shall be familiar with the ***PVA Flagship SMS***, its purpose, and how it relates to their duties and responsibilities.
3. The company and all personnel share the responsibility to implement the ***PVA Flagship SMS***.

Requirements

1. The Company’s Safety and Environmental Protection Policy should be a concise and clear statement (no longer than 1 page is recommended) and easily understood by all personnel.
2. The Company’s objectives and standards must be set at the highest level that is reasonable for the Company to enforce. At the very least, the Company shall comply with all mandatory rules and regulations.
3. The “Policy” should describe:
 - The goal and commitment of the Company to the ***PVA Flagship SMS***, and
 - The strategy to achieve and maintain the goal.
4. Indicate the “Policy’s” interaction with existing Company policies and procedures.
5. The “Policy” should be signed by the owner or comparable decision-maker, communicated, and posted throughout the Company.
6. The “Policy” should be reviewed at regular intervals to ensure that it remains relevant and effective.
7. The “Policy” should be posted prominently aboard vessels and shore facilities.
8. Implement the “Policy,” which includes the best method to ensure that all employees understand its content and ensure the Top or Senior Management’s commitment to its objectives.

Action Items

1. Develop policy using Chapter 2 template in the ***PVA Flagship SMS Manual*** or company specific equivalent.
2. If applicable, reference safety, security, and environmental programs, for example: EPA VGP, Non-Tank Vessel Response Plans, PVA Green WATERS Program, Streamlined Inspection Program (SIP), and PVA Alternative Security Program.



Chapter 3: Company Responsibility and Authority

Overview

To ensure a well-functioning safety management system, a Company should document, as specified in 33 CFR 96.230 (b), the responsibility, authority, and interaction of all personnel who manage, perform, and verify work affecting and relating to safety and pollution prevention.

For smaller companies, one person may fill more than one position.

Responsibility

1. Company responsibility and authority must be clear.
2. Include an organizational chart of the company to show the lines of responsibility and the allocation and interrelation of authority in the ***PVA Flagship SMS***:
 - The person(s) or position(s) with the highest authority in the development, implementation, and maintenance of the ***PVA Flagship SMS***;
 - The Designated Person(s) and how they can be contacted;
 - The person(s) or position(s) with the overall operational responsibility and authority for safety and environmental protection;
 - The person(s) with routine responsibility for safety and environmental protection; and
 - The interconnectivity between shoreside and vessel operations.

Requirements

1. The company shall define and document the responsibilities and authority of all personnel who manage or perform work affecting safety and environmental compliance.
2. Job descriptions and roles should be clearly defined.
3. Job descriptions for those employees responsible for any portion of the ***PVA Flagship SMS*** should be created and kept on file containing the following details:
 - position (job title)
 - vessel or office location should be identified, if appropriate
 - immediate supervisor
 - qualifications required for the position
 - general responsibilities for safety and environmental protection
 - specific responsibilities
 - emergency responsibilities
4. The Company should ensure resources, like shore-based support, are provided to enable the Designated Person to carry out their responsibilities, and all vessels are maintained in safe operating condition.

Action Items

1. Complete Chapter 3 template in the ***PVA Flagship SMS Manual*** or company specific equivalent.
2. Insert Company Organization Chart. (See ***PVA Flagship SMS Best Practice Guidance, Samples, and Tools***).
3. Complete Job Descriptions using template or company specific equivalent.



Chapter 4: Designated Person

Overview

1. Every company must designate a person with direct access to the highest level of management to:
 - Ensure the safe operation of each vessel, and
 - Provide a link between the company and those on board.
2. The role of the Designated Person should be considered from the point of view of function(s) and not position. Therefore, duties and responsibilities may be allocated within the existing management structure.
 - As an example, a sole owner operating a single vessel may serve as the Designated Person.

Responsibility

The Company should state, in writing, who the Designated Person(s) is and that they have:

- Access to the highest level of management ashore and aboard the company's vessel(s);
- Adequate support and shore based resources for vessel operations;
- The independence and authority to report deficiencies observed to the highest level of management; and
- Responsibility for organizing the **PVA Flagship SMS** audits and ensuring that appropriate action has been taken.

Requirements

1. The Company shall appoint a Designated Person to manage the **PVA Flagship SMS** implementation and execution.
2. The Designated Person(s) should have all of the necessary qualifications to realize the responsibilities and authorities stated by the Company in the **PVA Flagship SMS**.
3. Selection criteria for the appointment of Designated Person(s) may include:
 - management experience
 - maritime experience
 - knowledge of company safety and pollution prevention measures
 - language and communication skills
 - commitment to **PVA Flagship SMS** objectives
4. The Company shall make all employees aware of who the Designated Person is in writing.
5. The Company shall define and document the Designated Person's responsibilities regarding:
 - Implementing the safety and environmental compliance policies of the company;
 - Ensuring compliance with all applicable safety and environmental regulations;
 - Motivating employees in the execution of the **PVA Flagship SMS**;
 - Reporting non-conformities to management; and
 - Tracking non-conformity resolution.



Action Items

1. Complete Chapter 4 Designated Person template in the *PVA Flagship SMS Manual* or company specific equivalent.
2. Designated Person to receive Designated Person training within 12 months.



Chapter 5: Master's Responsibility

Overview

This chapter references the Master's responsibility and authority as specified in 33 CFR 96.250 (d) and (e).

Responsibility

The Company should clearly define and document the master's responsibilities with regard to the following:

- Implementing the Safety and Environmental Protection Policy of the Company onboard the vessel;
- Motivating the crew in the observation of that policy;
- Issuing appropriate orders and instructions in a clear and simple manner;
- Verifying that specified requirements are observed; and
- Reviewing the Company's implementation of the ***PVA Flagship SMS*** and reporting non-conformities to management.

Requirements

The Company should prepare a written statement verifying the Master has overriding responsibility and authority to make vessel decisions:

- The ability to make decisions about safety and environmental protection; and
- The ability to request the Company's help when necessary.

Action Items

Complete Chapter 5 template in the ***PVA Flagship SMS Manual*** or company specific equivalent.



Chapter 6: Resources and Personnel

Overview

This chapter references the personnel procedures and resources needed to provide the highest level of safety, and environmental compliance as specified in 33 CFR 96.250(f).

Responsibility

1. The Company shall provide resources and personnel to ensure the highest level of safety and environmental compliance.
2. The Company shall ensure that each vessel master is given the necessary support so that his/her duties can be safely performed.
3. The Company should familiarize employees with provisions of the **PVA Flagship SMS** relevant to their responsibilities and provide the necessary support so that his or her duties can be safely performed.
4. All personnel involved in vessel operation should become familiar with minimum regulations dealing with aspects of safe vessel operation and pollution prevention that are incorporated in 33 and 46 CFR.

Requirements

Masters

1. The Company shall ensure that each vessel master is properly qualified for command.
2. The Company should only appoint vessel Masters who have the following qualities:
 - Competence to command the type of vessel to which they are assigned;
 - Familiarity and fully conversant with the Company's **PVA Flagship SMS** relevant to their duties.

Personnel

1. The Company shall ensure each vessel is manned with qualified, certificated, and medically-fit crew in accordance with applicable rules and regulations.
2. The Company shall ensure that the vessel's personnel are able to perform and execute their duties related to the Company's **PVA Flagship SMS**.
3. The Company shall ensure that all personnel involved in the **PVA Flagship SMS** have an adequate understanding of the management system including all associated documentation and procedures.
4. The effectiveness of the Company's implementation of the **PVA Flagship SMS** will depend upon the commitment and motivation of the vessel personnel. The Company should consider the following when assigning personnel in the context of the **PVA Flagship SMS**:
 - The type of operation in which the vessel is engaged and the crew's workload;
 - The skills required by the crew for the safe execution of the tasks they are expected to perform in normal operations and in the event of emergencies;
 - The awareness of the crew with respect to their duties; and
 - The availability of appropriate records of qualifications.



5. The Company shall establish procedures that address the following:
 - Qualifications for each position including education, experience and training;
 - Medical fitness standards and standards of competency for vessel personnel;
 - **PVA Flagship SMS** training and familiarization for newly joining personnel;
 - **PVA Flagship SMS** training and familiarization for vessel and shore-based personnel.

Relevant Rules

All personnel involved in vessel operation should become familiar with minimum regulations dealing with aspects of safe vessel operation and pollution prevention that are incorporated in 33 and 46 CFR.

Training

Drills and training should be carried out in accordance with the procedures and requirements contained in the **PVA Flagship SMS**.

Communication

The Company should ensure that all crew members are able to communicate effectively with other crew members and passengers.

Action Items

1. Develop policy for management commitment to support personnel with resources using Chapter 6 template in the **PVA Flagship SMS Manual** or company specific equivalent.
2. Develop procedures for hiring, orientation, job specific, and on-going training for personnel using **PVA Flagship SMS Manual** templates or company-specific equivalent.



Chapter 7: Vessel Operating Procedures

Overview

Common areas covered in vessel operating procedures may include, but are not to be considered all-inclusive to all vessel operations:

- Safe Working Practices
- Start Up
- Embarking
- Underway Operations
- Special Operations
- Shut Down
- Disembarking
- Fueling
- Vessel Documentation/Recordkeeping

If vessel operating procedures are already developed and being used by the Company, the Company should verify completeness and reference the procedures in the ***PVA Flagship SMS***

Responsibility

The Company is responsible for establishing procedures that detail the plans and instructions for key vessel operations concerning the safety of the vessel and the prevention of pollution.

Requirements

1. The various tasks involved should be defined and assigned to qualified personnel.
2. This information should be easily understood by all relevant vessel personnel.
3. All written procedures, instructions, or plans should be kept simple and unambiguous. Checklists may be helpful.

Action Items

1. Develop customized procedures and checklists for key vessel operations using ***PVA Flagship SMS Best Practice Guidance, Samples, and Tools*** templates or company specific equivalent.



Chapter 8: Emergency Preparedness

Overview

Common areas covered for emergency preparedness may include, but are not to be considered all-inclusive to all vessel emergency procedures:

- Anchoring
- Collision and Allision
- Drills and Training:
 - Abandon Ship
 - Fire Fighting
 - Man Overboard
- Crowd Management
- Emergency Communication
- First Aid/CPR
- Flooding and Damage Control
- Grounding (Unintended)
- Pollution Response (Oil, Garbage, HAZMAT)
- Propulsion and Steering Loss

Responsibility

1. The Company shall establish emergency procedures to:
 - Prepare for various emergencies involving pollution and the safety of the vessel, crew, and passengers.
 - Follow in response to different types of accidents or hazardous occurrences.
2. The Company shall identify emergency situations where vessel contingency planning would be required, and provide procedures as appropriate.
3. The Company shall ensure employees are trained and proficient in carrying out the emergency procedures.

Requirements

1. The various tasks involved in emergency preparedness and response should be defined and assigned to qualified personnel.
2. Written procedures for emergency preparedness and response must be made available to all Company personnel, both shore and vessel based. The procedures should:
 - Identify, describe, and direct response to potential emergency vessel situations.
 - Establish and maintain programs for drills and exercises to prepare for emergency actions.
 - Provide measures to ensure that the Company's organization can respond to hazards, accidents, and emergency situations involving their vessel(s).

Action Items

1. Develop customized procedures and checklists for emergency response using ***PVA Flagship SMS Best Practice Guidance, Samples, and Tools*** templates or company specific equivalent.
2. Establish Drill and Exercise training requirements and intervals.



Chapter 9: Reporting Procedures

Overview

Events should be reported in accordance with the Company's event reporting procedures; evaluated by the Designated Person; and corrective actions assigned as appropriate.

Events may be identified by, but are not limited to, the following:

- Employees
- Audits
- Coast Guard Inspections
- Reportable Marine Casualty (CG-2692)
- Nonconformities (including CG-835)
- Near Miss Reporting
- Risk Assessments
- Reviews
- Incidents, Accidents, Injuries, Hazardous Occurrences, etc.

Responsibility

1. The Company is responsible for ensuring that unwanted occurrences, nonconformities, or opportunities for improvement are reported, investigated, tracked, and analyzed to improve safety and pollution prevention.
2. The Company should ensure that corrective actions are implemented, verified, and communicated with employees.

Requirements

1. Procedures and responsibilities for reporting, documenting, and tracking events should be clearly established.
2. Root cause analysis and corrective action shall be conducted to prevent recurrence.
3. Results of non-conformity reports and corrective actions shall be kept by the Designated Person, and made available for examination by management, auditors, and regulatory agencies.
4. Nonconformities identified by employees shall be reported using the Company's nonconformity reporting procedure.
5. Reports of nonconformities shall be evaluated by the Designated Person, and a corrective action assigned as appropriate.

Action Items

1. Develop procedures and checklists for reporting and tracking events. See ***PVA Flagship SMS Best Practice Guidance, Samples, and Tools***, or use company specific equivalent to accomplish this task.



Chapter 10: Maintenance

Overview

Maintenance procedures for each vessel are implemented according to the requirements of 33 CFR 96.250(j).

Common areas covered for maintenance may include, but are not to be considered all-inclusive to all maintenance and inspection procedures:

- Critical Equipment
- Electrical Equipment
- Firefighting Equipment
- Ground tackle
- Hull
- Lifesaving Equipment
- Machinery
- Miscellaneous Systems and Equipment
- Navigation equipment
- Passenger and crew space
- Pressure Vessel and Boiler
- Sanitary Systems
- Steering System

Responsibility

1. The Company shall establish maintenance and inspection procedures for critical vessel equipment, the sudden operational failure, of which would cause a hazardous situation.
2. The Company should ensure that maintenance procedures for each vessel are implemented according to the requirements of 33 CFR 96.250(j).
3. The Company shall maintain records of maintenance and inspections, kept by the Designated Person, and available for examination by employees, management, auditors, and regulatory agencies.
4. The Company shall ensure that the recording/reporting procedures for identified nonconformities are followed.

Requirements

1. Maintain each vessel in accordance with relevant rules and regulations, including additional vessel maintenance required by the Company.
2. Hold inspections at appropriate intervals.
3. Report maintenance discrepancies with possible cause (if known).
4. Take action to correct discrepancies.
5. Maintain records of inspections, preventive/corrective maintenance, and corrective actions.



Action Items

1. Develop procedures and checklists for maintenance and inspection of vessel systems and equipment using ***PVA Flagship SMS Best Practice Guidance, Samples, and Tools*** templates, Coast Guard Inspection Criteria Reference sheets, or company specific equivalent.
2. Identify and list critical equipment. See 33 CFR 96.250(j)(5). Note: Keep it short.



Chapter 11: Documentation

Overview

In accordance with 33 CFR 96.250(k), a Company should develop policies to control all documents and data relating to their Safety Management System.

Control and maintenance of **PVA Flagship SMS** documentation is important to the effectiveness of the system.

Responsibility

1. The Company shall establish and maintain document control procedures to ensure that all **PVA Flagship SMS** related documents are current and that outdated documents are promptly removed from the system.
2. The Company shall ensure that all **PVA Flagship SMS** documentation is maintained by the Designated Person, and is available for review by employees, management, auditors, and the Coast Guard.
3. The Designated Person is responsible for the version control of these documents.
4. The Company shall ensure personnel involved with implementation of the **PVA Flagship SMS** are notified of SMS related document changes.

Requirements

1. All valid documents need to be readily available in appropriate, designated locations to all employees involved in the **PVA Flagship SMS** and shall be located in accessible places to facilitate its use and implementation.
2. Changes to the **PVA Flagship SMS** documents should be reviewed and approved by authorized personnel, at which time, outdated versions or obsolete documents will be promptly removed and destroyed.
3. Document revisions should be readily identifiable, and relevant employees should be notified of all changes. Employees affected by each change should be involved in defining and implementing new policies.

Action Items

1. Develop policy and procedures for control and maintenance of documents using **PVA Flagship SMS Manual** template or company specific equivalent.
2. Develop a listing of all required documents as described in Table 96.250 of 33 CFR, which can also be found in **PVA Flagship SMS Best Practice Guidance, Samples, and Tools**.



Chapter 12: Company Verification and Review

Overview

A policy should be developed to ensure that procedures developed within the **PVA Flagship SMS** are followed properly and in accordance with regulations.

Responsibility

1. The Company shall carry out Internal Safety Audits annually. More frequent internal safety audits may be required by the Company if there is evidence that the **PVA Flagship SMS** is not functioning effectively or efficiently.
2. The Designated Person is responsible to ensure that scheduled internal audits are performed and any nonconformities identified are documented and resolved in a timely manner.
3. The Company may schedule External Safety Audits if desired.

Requirements

1. Evaluations such as internal audits, master's reviews, and management reviews shall be scheduled every 12 months to determine the effectiveness and continued suitability of the **PVA Flagship SMS** and to review the system in accordance with the established procedures of the Company.
2. Personnel carrying out Internal Safety Audits should be independent of the areas being audited unless this is impracticable due to the size and nature of the Company. The Company shall select appropriate internal auditors.
3. Results of internal audits shall be brought to the attention of all personnel having responsibility in the area involved.
4. Personnel carrying out External Safety Audits shall be independent of the Company being audited.
5. The Company shall carry out management reviews annually of internal and external safety audits, and the correction of nonconformities to determine the effectiveness of the **PVA Flagship SMS** and performance related to compliance with its safety and environmental compliance policies.

Action Items

1. Develop procedures for performing and reporting on company verification and reviews using **PVA Flagship SMS Manual** templates or company specific equivalent.
2. Develop an audit form, which can be found in the **PVA Flagship SMS Best Practice Guidance, Samples, and Tools**.
3. Internal auditors shall complete an auditor training program within 12 months.