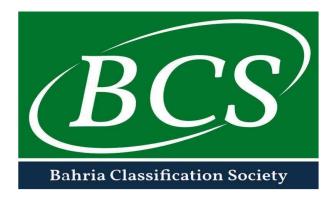# BAHRIA CLASSIFICATION SOCIETY

BCS-G 007

Guidelines for Ship Security Systems Audit

January 2023

These guidelines list requirements and procedures and are intended to be used as supporting material to BCS Rules.

Unless otherwise specified, these Rules apply according to the implementation dates as defined in each interpretation. See Rule Change Summary on BCS website for revision details

"General Terms and Conditions" of the respective latest edition will be applicable (see Rules for Classification and Survey).

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https://www.bahriaclasssificationsociety.org

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1. Introduction

According to SOLAS XI-2 and ISPS code, all passenger ships, cargo ships of 500 GT and above, and mobile offshore drilling unit engaged in international voyages must be carried out the ship security assessment, established the ship security plan and must possess an International Ship Security Certificate (ISSC) after initial audit confirming the practice of the plan on-board.

As stipulated in ISPS code A/9.4.11, a ship security plan (SSP) is required to review periodically. Please refer to item 7.1.2 for approval of SSP amendment.

2. Definitions

"Company" means a Company as defined in SOLAS regulation IX/1.

"Recognized Security Organization (RSO)" means an organization with appropriate expertise in security matters and with appropriate knowledge of ship and port operations authorized to carry out an assessment, or a certification activity, required by this chapter or by part A of the ISPS Code.

"Ship Security Plan (SSP)" means a plan developed to ensure the application of measures designed to protect the persons on board, cargo, cargo transport units, ship's stores or the ship from the risks of a security incident.

"Ship Security Officer (SSO)" means the person on board the ship, accountable to the master, designated by the Company as responsible for the security of the ship, including implementation and maintenance of the ship security plan and for liaison with the Company security officer and port facility security officers. It was agreed at IMO that nothing would prevent the master from being appointed as an SSO. Since 1 July 2009, it is required a "Certificate of proficiency" for SSO issued by the Administration in accordance with STCW Reg. VI/5.

"Company Security Officer (CSO)" means the person designated by the Company for ensuring that a ship security assessment is carried out; that a ship security plan is developed, submitted for approval, and thereafter implemented and maintained and for liaison with port facility security officers and ship security officer.

3. Certificates

3.1 Types of Certificates and Validity

The types of ISSCs are as follows.

.1 ISSC： Full term certificate issued under the authority of the Flag State.

.2 Short Term ISSC： A certificate issued to cover the period until a full-term ISSC is issued. As a rule, it is issued after Initial, Renewal or Additional Audit.

.3 Interim ISSC： A certificate that may be issued to a ship which has newly joined under management of a Company, or which has changed her Flag.

3.1.1 ISSC

An ISSC is issued to a ship which holds a Ship Security Plan (SSP) approved by the Flag State or by the Society or other Recognized Security Organization (RSO) on behalf of the Flag State, upon successful completion of an Initial Audit.

The validity of ISSC issued after the Initial Audit shall be five years from the last date of the Audit subject to execution of an Intermediate Audit. The validity of an ISSC issued after the Renewal Audit shall be five years from the next day after the expiry date of existing ISSC when the Renewal Audit is completed within three months before the expiry date of existing ISSC; but when the Renewal Audit is completed more than three months before the expiry date of old ISSC, the new ISSC shall be valid from the date of completion of Renewal Audit for a period of five years.

The ISSC shall be endorsed upon successful completion of an Intermediate Audit, or of an Additional Audit where the flag Administration authorized to do so.

The ISSC shall be kept on board the ship and a copy of the ISSC shall be kept by the Company.

3.1.2 Short Term ISSC

A Short term ISSC valid for five months shall be issued to a ship under the authority of Flag State upon completion of an Audit by the Auditor to prove satisfactory completion of an Initial or Renewal Audit.

A Short term ISSC shall be issued at an Additional Audit which existing ISSC are re-written.

With regard to ships flagged with Panama, the flag does not authorize the issuance of a short term ISSC upon completion of the Initial Audit. Therefore, the company is requested to apply to the flag for issuing the full term ISSC during the validity of Interim ISSC.

3.1.3 Interim ISSC

An Interim ISSC valid for six months shall be issued to a ship subject to the following conditions.

Where it is not possible to verify compliance with the SSP due to not enough implementation period, an Audit for Issuing Interim ISSC will be conducted even when a SSP is approved

.1 when a ship does not hold ISSC, at delivery of the ship:

.2 when a Company newly commences management of the ship:

.3 when a ship's Flag is transferred (in case of not approval of SSP or according to flag requirement).

3.2 Extension, Invalidation, Re-issuance, Revision and Returning of Certificates

3.2.1 Extension of Validity of a Certificate

When a ship is underway to an intended port to undergo a Renewal Audit at the time of due date of the certificate, ISSC may be extended by not more than three months upon receipt authorization for extension issued by the Administration. However, when a ship arrives at the intended port, it shall not be permitted to leave the port without a renewal certificate or the current certificate with endorsement for extension based on the completion of renewal audit.

3.2.2 Invalidation of a Certificate

An existing certificate shall become invalid when:

.1 a ship has not undergone the periodical Audit (Renewal, Intermediate):

.2 remedial actions for non-compliance set out at the Audit have not been completed within the agreed period of time:

.3 a part of the SSP which requires approval upon amendment has been amended without approval, or part of the SSP which does not require approval upon amendment has been amended without notification.

.4 when a Company ceases managing the ship:

.5 when a ship changes her Flag:

.6 when Audit fees and expenses have not been paid:

.7 when an ISSC is issued to replace an Interim ISSC:

.8 when a Company requests withdrawal of the ship from the ISPS Register.

3.2.3 Re-issuance of a Certificate

When a certificate is lost or damaged, please request the Head Office of the Society (Ship Management Systems Department) for re-issue of the same.

3.2.4 Revising Entries on a Certificate

When the particulars, such as ship's name, indicated on the certificate are changed, an Additional Audit is required to revise the entry on the ISSC. However, when changes are made only to the name or address of the Company, no Additional Shipboard Audit is required. Where the description of the SSP regarding changes for the name or address of the Company is amended, re-approval for the revision of the SSP may be required, therefore, please contact BCS.

3.2.5 Returning a Certificate

The Company is requested to return the certificate to Head Office or any offices convenient in the following cases:

.1 when a new certificate is issued through renewal or re-writing, or other reason:

.2 when a certificate has become invalid or expired:

.3 when a lost certificate is found after receiving a re-issued certificate

4. Types of Audit and Timing for the Audit

Types of Audits are as follows:

Initial Audit: Audit to issue an ISSC to a ship for the first time

Renewal Audit:Audit to renew the ISSC within not more than 5 years.

Intermediate Audit: Audit to be conducted between the 2nd and 3rd anniversary date.

Additional Audit： Includes the following Audits:

      a. Additional Audit to lift any non-compliance.

      b. Additional Audit to be conducted after re-approval of an SSP.

      c. Additional Audit other than the above.

           ・Name/Flag/Particular change

           ・SSAS related (replacement, repair or modification)

Audit for issuing interim ISSC

5. Initial Approval

5.1 Documents to be Submitted

Following documents are to be submitted for initial approval:

a. SSP
b. Report of Ship Security Assessment (SSA)
c. Copy of CSO's Training Certificate
d. Copy of (Provisional) Certificate of Registry
e. Copy of valid DOC of ISM Code
f. Procedure and organization chart of the Company that specify the responsibility and authority of the Company Security Officer (CSO) and other shore-based personnel relating to the ship security.
g. Declaration of the Company stating that Company shall give necessary assistance to the CSO and master of ship to achieve their duties relating to the ship security.
h. Documents indicating the latest information on the following:
   - person responsible for appointing shipboard personnel
   - person responsible for deciding the employment of the ship
   - parties who are chartering the ship (when ship is chartered)

5.2 Review of SSP

The submitted SSP shall be reviewed and approved when it is verified to be in compliance with the ISPS Code. When the submitted SSP is found to be not in compliance, AIC (Auditor in charge) shall request its correction. Approved SSP and SSA shall be stamped electronically and be returned to the Company by electronical files. The company is requested to send the files for the ship and keep them at the company. BCS shall retain only the cover page of SSP with approved stamp, record of amendments, contents of the SSP and the cover page of the SSA report. In addition to the above procedure, the Society will issue a document certifying approval of the SSP.

5.3 Approval of Amendments to the approved SSP

In principle, any amendments made to the approved SSP is required re-approval. Please re-submit the SSP with electronical files to the local offices of the Society for re-approval. Also please be noted that a Revision list should be updated at any amendments to the SSP. In case of amendment not related to ISPS Code A/9.4.1 - A/9.4.18, or approval of such amendments are waived by the flag Administration, a formal approval procedure is not necessary to, however, it is necessary be notified to BCS of such amendment made to the SSP. BCS will approve as Initial approval for the amendments made to the SSP which is not approved by this Society.

6. Execution of Shipboard Audit

6.1 Initial Audit, Intermediate Audit and Renewal Audit

6.1.1 Our Auditor will visit the ship from the Branch or Overseas Office of the Society nearest to the port (hereunder OIC). The Auditor conducts the Audit along with the Audit Plan, informed in advance, that includes an interview with the master, SSO, specific security personnel (if nominated), verification of records and checking the security measures of the ship and so on.

6.1.2 When a Non-conformity (NC) is found during the Initial or Renewal Audit for the Flag vessels with full term ISSC issued by the Administration, ISSC shall not be issued since the Audit is not to be completed until the NC is rectified.

6.1.3 When a Non-conformity (NC) is found during Intermediate or Additional audit, the Auditor is to request correction of the NC, even endorsement could be made. If the correction is not taken during the audit, the Auditor is to request the Company to submit the corrective action plan to the auditor in charge within two weeks, namely after entering a schedule not exceeding three months for implementation of the necessary corrective action onto the same. Then, if the Auditor finds the plan is appropriate, this audit is completed. The implementation of the corrective actions had been taken will be verified at next periodical shipboard audit. Considering the seriousness of the Failure (Non-conformity), the auditor may request an "Additional audit to clear the Non-conformity".

6.1.4 Please pay attention, the ISSC becomes invalid if the NC is not solved by the agreed date, where the ship was requested "Additional Audit to clear the NC".

6.1.5 As attendants to the Audit, please nominate some crew who are familiar with the SSP, including the master or SSO.

6.1.6 Prior to an initial audit, please conduct at least one security related drill onboard. If not, an auditor will require a drill during an initial audit.

6.1.7 Please conduct the internal audits and review at intervals specified in SSP, and keep the record onboard.

6.1.8 Please keep the records at least 5 years both onboard and in the company.

6.1.9 Please ensure that, as the audit records are considered as highly classified documents, they must be protected against unauthorized access or careless disclosure as well as the records specified in SSP.

6.2 Audit for Issuing Interim ISSC

8.2.1 An Audit for Issuing Interim ISSC is to be conducted by the Auditor in charge to verify the following items. Please note that an Interim ISSC is to only be issued when all of the following items have been verified.

.1 shipboard personnel who has security duty are familiar with the duty and the responsibilities given in the SSP,

.2 SSO is given appropriate training and kept a "Certificate of proficiency" issued by the Administration in accordance with STCW Reg. VI/5

.3 a copy of an SSP meeting the requirements of SOLAS XI-2 and part A of ISPS Code A/9.4.1 - A/9.4.18 is available on board, has been submitted for review and approval to the flag Administration or its RSO, or has been approved by the flag Administration or its RSO, and is being implemented on the ship. The evidence showing that the SSP has been submitted to a Flag Administration or it's RSO for approval is to be submitted when an application is made, if any; (for instance, in case that the SSP has been submitted to this Society, a letter of ISPS Schedule for Review and Approve of SSP was issued. The other hand, in case that the SSP has been submitted to other RSO, it is a letter of receipt by the RSO or a letter of submission and etc.)

.4 applicable national requirements are incorporated into the SSP

.5 at least one security related drill given in the SSP has been either carried out or planned by the SSO/CSO before the ship's departure

.6 security equipment given in the SSP has been incorporated into the ship security system and has been maintained accordingly

.7 all security and surveillance system given in the SSP are operational and are meeting objectives

.8 the SSAS is verified the following item:

a) witnessing transmission test or receiving receipt for completed the test successfully of the SSAS

b) operation of the SSAS as per ISPS Code A/9.4.17 and A/9.4.18

.9 verification of the presence of CSR meeting SOLAS Reg. XI-1/5 or confirmation to submit to the Administration for approval.

8.2.2 In addition, the Auditor is to verify that a copy of valid DOC (including Interim DOC) is placed onboard the ship and the valid SMC (including Interim SMC) is/will be placed onboard the ship.

6.3 Additional Audits to clear any non-conformity

In principle, the extent of Audit is to be limited to the areas related to the non-conformity.

6.4 Other Additional Audits

6.4.1 Additional Audit for Change of Ship's Name

When a ship's name has been changed, generally, the Auditor is to visit the ship to conduct an Additional Audit. During this Additional Audit, the Auditor is to verify that the Registry Certificate and the Statutory Certificates have been changed appropriately. Where the ship's name is to be included in the transmitted data of SSAS required by the flag Administration, the Auditor is to witness a ship security alert test or verify the receiving receipt for completed the test successfully.

6.4.2 Additional Audit as required by a Flag State

Flag States may require the ship to undergo Additional Audits. In this case, the Society is to inform of the extent of the Audit to the ship, in consideration of the background of Flag State's requirement.

6.4.3 Additional Audit due to change of ship's flag

Generally, it's required to conduct not an additional audit but an audit for issuing Interim ISSC. However, it may be possible to issue an ISSC with taking over the validity of existing one, if the following conditions are satisfied;

.1 No change of the management company.

.2 The SSP has been approved with new flag requirement.

.3 Management company explained 1 and 2 above to the new flag administration and received authorization to issue the ISSC with the validity of existing certificate.

6.5 Verification of the Ship Security Alert System (SSAS) at Initial, Periodical and Additional Audit

6.5.1 After installation of Ship Security Alert System (SSAS), a report is to be kept onboard the ship prepared by an approved radio technician certifying successful completion of testing in order to verify compliance with the requirement SOLAS Reg. XI-2/6 paragraph 2 to 4. However, in case of Self-Contained SSAS, such a report can be prepared by an SSO after relevant testing.

6.5.2 At the initial verification after installation of the SSAS, the following items will be verified:

.1 a description on the SSAS is incorporated into the SSP onboard.

.2 verify the report prepared in accordance with paragraph 6.5.1 above.

.3 attending transmission testing or verifying receiving receipt for completed the test successfully.

.4 verify the requirement as per ISPS Code A/9.4.17 & A/9.4.18

6.5.3 At the subsequent periodical audit, (Initial, Intermediate & Renewal Audit), the following will be verified:

.1 examining record of maintenance, calibration & testing as required by ISPS Code A/10.1.10

.2 examining record of transmission testing

.3 verifying requirement given in ISPS Code A/9.4.17 & A/9.4.18