

---

# ISPS Circular No:

## 02/2014

Issue date: 29 September 2014

---

Subject:

### ISPS PREPARATION FOR PSC INSPECTION

**PSC deficiencies** related to security represent some **3% to 5%** of the deficiencies found on SOLAS ships. Ships with security related deficiencies are almost invariably found to have safety or other deficiencies.

On the basis of **observation**, a **PSCO** can establish that there are **clear grounds** for believing that the ship is not in compliance with the requirements of the ISPS Code. Until such point that clear grounds are established, examinations shall be done solely through observations that expected **security procedures** are in place and though verifying the on board presence and validity of required security **documents and certificates**.

**1. The first impression is very important. Especially:**

- **Gangway & moorings** (in good condition, rigged as required, clean)
- **Access control** (identification check, visitors log maintained, restricted areas controlled)
- **Appearance of gangway watch, officers and crew** (neat working clothes, appropriate personal protective equipment, professional attitude)
- **Appearance of accommodation and outside decks** (clean, well illuminated, non slip walkways on outside deck)
- **PSC officer** should be **accompanied** by senior officer(s) during inspection, tour of the vessel etc.

**2. Certificates and Documents**

- Valid International Ships Security Certificate (**ISSC**)
- Latest issue of the Continuous Synopsis Record (**CSR**) is available and valid. The **file** of previously issued CSR's is complete
- **Approved Ship Security Plan (SSP)** is available, including evidence of the approval (Approval Letter and Report)
- **Certificates of proficiency for the SSO and crew** with designated security duties
- Records of crew **ISPS familiarization** when joining the vessel
- **Flag circulars**
- **SSAS test** message acknowledged by CSO

**3. Ship Security controls are to be established and implemented at all times**

*The below measures are just indicative, please consult the SSP for the specific measures provided, and their level of application depending on security level.*

**3.1 Access control to the ship**

- **Access points** are normally **secured** or continuously attended to prevent unauthorized access (**doors in escape routes** must be capable of being opened without keys from the direction for which escape is required, this includes emergency escapes and doors to the accommodation and wheelhouse)
- **Weather-deck** access vents, storage lockers, and **doors** to normally **unmanned spaces** (such as storerooms, auxiliary machinery rooms, etc) may be locked or precautions taken to prevent unauthorized access
- Security personnel **patrolling deck** areas

- Security **personnel appear to be briefed** re: threats, suspicious persons, objects or activities and need for vigilance
- **Limit entry** to the vessel to a minimum number of access points (while not restricting egress from the vessel in the event of an emergency)
- **Coordinate with the waterfront facility** to extend access control beyond the immediate area of the vessel

### 3.2. Controlling the embarkation of persons and their effects

- Security personnel require personal **identification and reason** to board (**access may be denied** to any **person refusing** to submit to security verification or inspection at a point of access)
- Visitors and luggage **Inspection** at a point of access
- Visitors receive **escort**
- **Arriving crew** verified as authorized to serve aboard the vessel
- **Unaccompanied** baggage screened/searched

### 3.3 Monitoring Deck Areas and Areas Surrounding Ship

Mix of **lighting, watchkeepers, security patrols, guards, security equipment** used to observe the ship in general

### 3.4 Restricted areas (examples: Bridge, Engine Room, Steering Compartment, Cargo Control Room, Pump Room, Cargo Spaces, CO2 Room, etc.)

- Clearly **identified and marked** as required
- **Locked/ Secured/ Roving guard** for access points
- Intrusion **alarms** devices in use
- **Surveillance** Equipment in use

### 3.5 Ship's stores

- Checked for **match order** prior to loading
- **Stowed** immediately

### 3.6 Supervision of Cargo

- Cargo, transport units, and cargo spaces **checked** before operations
- Cargo checked for **match** to cargo **documentation**
- **Vehicles searched** prior to loading
- Anti-tamper **seals/methods** checked
- Cargo **visually/physically examined**

### 3.7 Other Items

- **Security Level** is set **correctly** as required by the Flag State and Port Authorities and all personnel are aware of the current level
- All **security equipment** is maintained, calibrated and tested as required by their manuals
- **Drills** are carried out regularly as per ISPS Code and SSP (available **records**) – crew to be able to perform standard security drills such as bomb threat drill , vessel search, discovery of a suspect object, change of security level, etc
- **Ship Security Alert System** (SSAS) is operational and records for tests and maintenance available
- **Company Security Officer** (CSO) is available at all times. The CSO can be readily identified by SSO and applicable officers and crew. Contact details are available
- **SSP** and related records are **protected** from unauthorized access or disclosure
- **Records** are maintained and retained as required by the SSP:
  - ✓ details of **training, drills, and exercises**;
  - ✓ reports of security **incidents**;
  - ✓ report of breaches of security or suspicious activities;
  - ✓ **changes** in *security levels* including the date and port;
  - ✓ **communication** related to security

- ✓ internal **audits**
- ✓ periodic **review** of the SSP/SSA
- ✓ implementation of any **amendments** to the Plan
- ✓ maintenance, calibration, and testing of **security equipment**; and
- ✓ **last 10 port of calls**

**4. Clarifications.** We have noted that although ISPS code and its provisions are in the Seafarers life 10 years now, there are often questions and doubts regarding the following:

#### 4.1 Changing security levels

Ships' **Flag administrations are responsible for setting security levels.** Ships intending to enter a port or port facility usually establish the security level applying at the port through direct contact with the port authority, prior to entry. If a ship is operating at a higher security level than that applying at the port, the information should be passed to the port authority prior to entry.

**A ship can never operate at a lower security level than the one being applied at the port** that it is visiting.

**A ship can** however, **operate at a higher security level**, when set by its flag administration, **than that applying at the port.** The port authorities should not seek to have the ship reduce the security level set by its flag administration.

#### 4.2 Declaration of Security (DoS)

The **DoS is an agreement** between a port and a ship or between a ship and another ship. It **confirms the security responsibilities** of each party during to ship/port (or ship/ship) interface.

When a **ship initiates a DoS**, the **port facility** is required to **acknowledge** the request, **however it does not have to comply** with the request.

When a **port facility initiates a DoS**, the request shall be **acknowledged** by the ship's master/SSO, and the **ship must comply** with the request.

A ship can request completion of a Declaration of Security when:

1. the **ship is operating at a higher security level** than the port facility or another ship it is interfacing with;
2. there is an **agreement** on a Declaration of Security between Contracting Governments covering certain international voyages or specific ships on those voyages;
3. there has been a **security threat** or a security incident involving the ship or involving the port facility, as applicable;
4. the **ship is at a port which is not required** to have and implement an approved port facility security plan; or
5. the ship is conducting **ship to ship activities with another ship not required** to have and implement an approved ship security plan.

Thank you for your kind attention.

Best Regards,

**P. Klavdianos | Head of Marine Management Systems Certification Division**