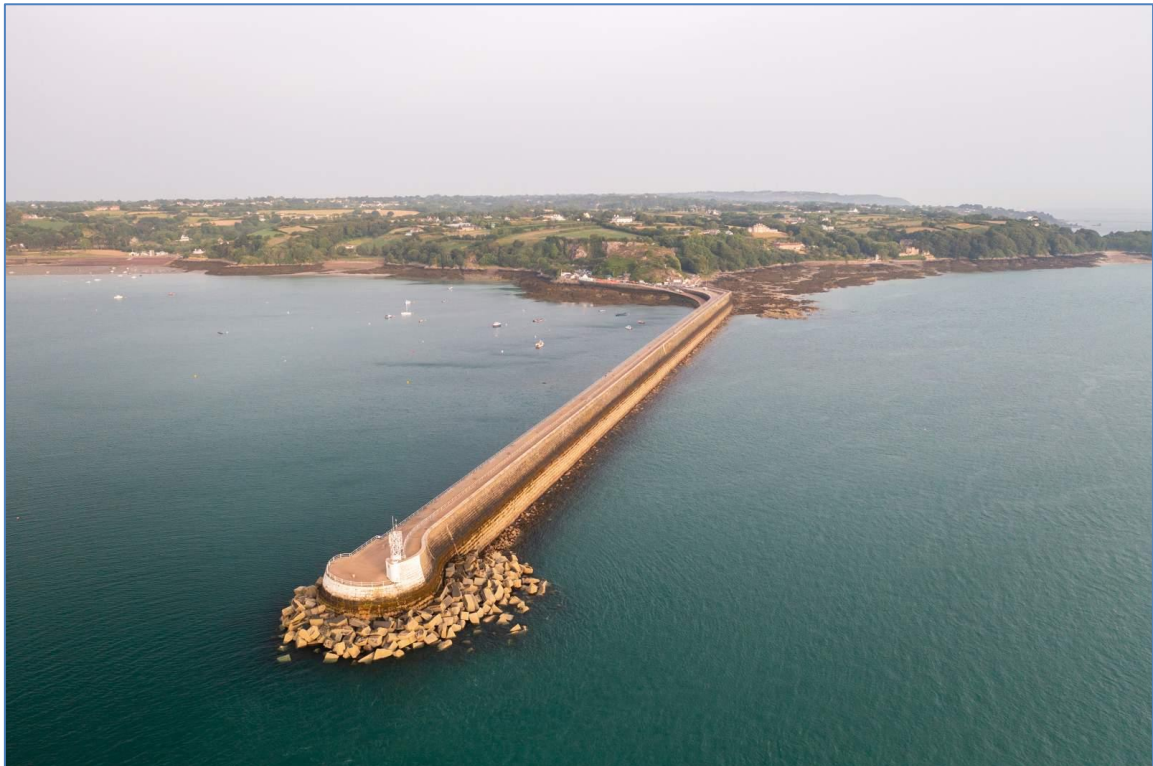


## JERSEY HARBOURS

## PORT MARINE SAFETY CODE AUDIT 2025



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## 1 INTRODUCTION

Marine and Risk Consultants Limited (Marico Marine) have been appointed to provide independent Port Marine Safety Code (PMSC) compliant Designated Person (DP) Services to Jersey Harbours since 1 January 2021. For the duration of this contract, the named DP nominated by Marico Marine has been William Heaps.

A full baseline audit of PMSC equivalent compliance took place on 22/23 September 2021 (following the lifting of Covid related travel restrictions), and since that time the DP has been providing ongoing support and assurance to the harbour and staff through remote meeting attendance, review of documentation, and visits to the harbour (approximately annually).

The contract to provide ongoing DP services was renewed for a further 2 years in July 2024, and a second full audit review was completed in August 2024.

The DP was invited to attend a Ports of Jersey Duty Holder meeting in person on 24 April 2025, chiefly to deliver an updated training session to Board Members and answer any questions that may arise with respect to PMSC compliance. Furthermore, responsibility for maintaining Jersey Harbours' Marine Safety Management System (MSMS) has also recently passed to a new staff member and the visit presented a good opportunity to meet in person. It was therefore agreed to extend the visit to achieve the two objectives above, and also undertake a re-audit of the MSMS, chiefly to assist the new Marine quality & environmental manager responsible for the MSMS to become familiar with the audit and assurance process

### 1.1 JERSEY AND THE PMSC

It should be noted that the States of Jersey are not subject to UK legislation and therefore are not required to comply with the UK PMSC. However, the Harbour Authority has recognised that the PMSC represents best practice in seeking to ensure safe and efficient harbour operations and therefore has publicly stated the intention for the harbours to comply with all relevant aspects of the Code. This includes the concept of the Designated Person.

During the course of audits and all other DP activities, due regard has been given to differences between the UK and Jersey (chiefly relevant to underlying legislation) while assessing compliance. However, where possible, audits have sought to assess equivalent compliance.

## 2 PMSC AUDIT 2025

### 2.1 STATUS OF THE PMSC

During the week immediately prior to the scheduled visit, a long-awaited new version of the Port and Marine Facilities Safety Code (PMSC, The Code) was published, along with an updated version of the supporting Guide to Good Practice. It was not possible therefore for Marico Marine to complete work on updating their bespoke PMSC audit proforma before the audit commenced. While there is little substantive difference between the new (2025) version of the Code, and the preceding version in terms of what is required for compliance, the layout of the two documents is very different and there is now more clarity with regard to what MUST, SHOULD or MAY be done to achieve compliance for many statements within the revised Code.

It was therefore agreed that in the interim, until a new Marico audit format can be completed, this audit would make use of the sample audit proforma provided by the MCA as an Annex A to the new Guide to Good Practice on Port and Marine Facilities (MCA, April 2025). Credit is therefore given to the MCA for the tables / audit questions which make up section 2 of this report. As a result, audit findings and recommendations will be referenced to the 2025 version of the Code.

### 2.2 VISIT / AUDIT SCHEDULE

The audit visit spanned 2.5 days, dictated by flight schedules. Although the original plan was for one full day of audit, and one morning attending the Duty Holder meeting, the remaining available time was used to visit outlying (historic) harbours, and to provide support and advice to marine team members.

#### **Tuesday 22 April.**

Designated Person – William Heaps (WH) arrives in Jersey approx. 12:30.

All afternoon – tour of most outlying harbours with Mark Byrne (MB), Historic Harbours Manager. Included discussion, and viewing locations and operations.

#### **Wednesday 23 April**

Office based audit, Maritime House.

Connor Rault (CR), Marine Quality and Environment Manager

Bill Sadler (WS), Harbour Master

Included brief visits to VTS at appropriate points.

(Concluded mid pm for CR pilotage commitments / WH updating Board presentation for following day.

#### **Thursday 24 April**

WH and WS to Airport for Board training and presentation (approx. 08:30 – 11:30).

Remainder of day: completed audit checklist with CR and Fleur Moisan (FM) - Marine Operations Manager

Late pm – WH departure for airport.

## 2.3 AUDIT FORMAT

As noted above, the audit used the newly published MCA checklist as a basis for checking PMSC compliance.

Reference was made to current versions of the MSMS documents to provide evidence that all relevant aspects of the Code had been considered and documented, but emphasis was placed on looking for evidence that documented policy and procedures could be shown to have been followed. In this respect, the visits to the outlying harbours, occasional questions direct to VTS and other marine staff, and review of documented records proved beneficial.

In practice, the DP is aware that the MSMS is already broadly complete and effective, and the opportunity was taken to discuss further enhancements and review facilitated by the recent appointment of a new Marine Quality and Environment Manager, with overall responsibility for the MSMS.

Section 3 of this report records the audit findings and discussions which took place during the visit.

## 2.4 AUDIT FINDINGS SUMMARY

Overall, the visit confirmed that the MSMS has continued to develop since the last full audit and covered almost all aspects of PMSC compliance as they apply to the States of Jersey and Jersey Harbours. Like all such systems there is always an opportunity for review and improvement, and this has been recognised both by the Marine Department and the newly appointed manager with overall responsibility for the MSMS. A number of improvement opportunities have been identified in this report and, if accepted, they should be transferred to an action plan, assigned to appropriate staff to address and progress to completion should be recorded.

No non-compliance with the PMSC was identified (noting some parts of the Code do not apply to Jersey), but in terms of ongoing improvement the following are particularly noted for priority attention:

- Resolve issues with document access on recently updated website;
- Ensure all policies are published as standalone documents (and available on website);
- Consider regularly sharing HAAC updates with DP;
- Consider a “ Tracker” document to assign responsibilities, timescales and status of all audit / incident investigation, etc. actions until they are closed off;
- Improve documented procedures for stakeholder consultation;

- The review of the (Tactical) Navigation Risk Assessments should be completed as a priority (and regularly reviewed thereafter following incident investigations, changes in operations);
- Detail of Dynamic Risk Assessment requirements and procedures should be recorded ASAP;
- Consider the format of Q Pulse meetings to separate out “H&S” and Navigation / Marine incidents; and
- A review of the safety plan and report is recommended.

Other minor recommendations are included in comments in section 3.

### 2.4.1 Saint Catherine’s Harbour

A specific observation is made regarding St. Catherine’s Harbour. This was visited during the tour on the first day of the audit at the DP’s request, as there have been a number of reported incidents. Issues were well explained by the Historic Harbours Manager, but after viewing the layout of the harbour, slipway, marked channel, moorings and swimming areas personally, the DP **strongly** recommends an urgent comprehensive navigation risk assessment of all activities within the harbour area to confirm (or otherwise) the suitability of current risk mitigation measures.

### 3 MCA AUDIT CHECKLIST

*SMS Reference:* Unless otherwise stated, references are to sections of the Marine Safety Management System Overview (20240102).

#### 3.1 DUTY HOLDER

PMSC / Guide Ref	Requirement	Y / N / NA
<b>1.2 Guide</b>	<b>Has a Duty Holder been appointed?</b>	<b>Y</b>
<i>SMS ref.</i>	2.1	
<i>Comment</i>	Note that the Designated Person (WH) is NOT a Duty Holder and should be removed from the list.	
<b>1.2 Guide</b>	<b>Is a Designated Person appointed?</b>	<b>Y</b>
<i>SMS ref.</i>	2.2	
<i>Comment</i>	Details given (WH, Marico Marine).	
<b>1.2 Guide</b>	<b>Has the Duty Holder made a clear published commitment to comply with the standards laid down in the PMSC?</b>	<b>Y</b>
<i>SMS ref.</i>	Policy	
<i>Comment</i>	Although stated on the web site, the main statement is in the marine safety policy, but no policies are available from the website	
<b>1.2 Guide</b>	<b>Have operational responsibilities for marine safety been clearly assigned, and are those entrusted with these responsibilities appropriately trained, qualified, and experienced?</b>	<b>Y</b>
<i>SMS ref.</i>	2.0	
<i>Comment</i>	There is a good overview of roles in the referenced section of the MSMS, supported by a clear Organogram.	
<b>1.3 Guide</b>	<b>When was the last review of existing powers based on local and national legislation undertaken and did this confirm compliance with duties and powers under existing legislation?</b>	<b>?</b>

PMSC / Guide Ref	Requirement	Y / N / NA
<i>SMS ref.</i>	Not referenced	
<i>Comment</i>	This is not specifically described in the MSMS; suggest adding a section describing role of HAAC in this respect (and find out what has happened in the past).	
<b>1.3 Guide</b>	<b>Is there a process of risk assessment including eliminating/reducing risk to ALARP?</b>	<b>Y</b>
<i>SMS ref.</i>	Section 4	
<i>Comment</i>	Good overview of process	
<b>1.3 Guide</b>	<b>Is a Marine Safety Management System in place and maintained to control marine Ops?</b>	<b>Y</b>
<i>SMS ref.</i>	Overview document supported by many other referenced documents and procedures, etc.	
<i>Comment</i>	Responsibility recently transferred to a new manager with appropriate experience, who is commencing a review while maintaining ongoing updates.	
<b>1.3 Guide</b>	<b>Do staff hold appropriate standards of qualification and training?</b>	<b>Y</b>
<i>SMS ref.</i>	12.0	
<i>Comment</i>	This section of the MSMS covers all staff.	
<b>1.3 Guide</b>	<b>Is audit used to measure policies, procedures and compliance with the code?</b>	<b>Y</b>
<i>SMS ref.</i>	5.4	
<i>Comment</i>	Procedures described, including DP audits.	
<b>1.6 Guide</b>	<b>How does the Duty Holder maintain insight and understanding of the organisations marine activities?</b>	<b>Y</b>
<i>SMS ref.</i>	Consider adding detail	
<i>Comment</i>	HM provides regular reports to Board / HAAC – consider sharing these with DP to maintain awareness.	
<b>1.6 Guide</b>	<b>Does the Duty Holder receive PMSC training / briefing specific to their role?</b>	<b>Y</b>
<i>SMS ref.</i>	Add more detail to section 2.1 (how, how often).	
<i>Comment</i>	For example, session delivered as part of this audit visit.	<b>Y</b>
<b>1.6 Guide</b>	<b>Do any of the Duty Holders have relevant maritime experience, and if so, do they function as the initial point of contact for the Designated Person?</b>	
<i>SMS ref.</i>	2.1	

PMSC / Guide Ref	Requirement	Y / N / NA
<i>Comment</i>	Clearly stated (Harbour Master).	
<b>1.6 Guide</b>	<b>How does the Duty Holder ensure that adequate resources are provided to manage marine operations effectively and to adhere to the stated marine and navigation policies, procedures, and systems?</b>	<b>Y</b>
<i>SMS ref.</i>	2.1	
<i>Comment</i>	This section is rather general, but does state this expectation from the DH.	
<b>1.9 Code</b>	<b>When was the last statement of compliance submitted to the MCA?</b>	<b>N/A</b>
<i>SMS ref.</i>	Marine Safety Policy item 10	
<i>Comment</i>	The policy explicitly says confirmation will be given to the relevant minister every 3 years, but in practice reported after every external (DP) audit / review.	

### 3.1.1 General Comments

The Organogram / Table 1 in the overview should be updated to reflect recent changes.

While audits and internal reviews and learnings from incident investigations are followed up, it is recommended that all such actions are maintained in a central “tracker” or simple database (spreadsheet) to assign responsibilities, timescales and status of all such actions until they are closed off.

### 3.2 DESIGNATED PERSON

PMSC / Guide Ref	Requirement	Y / N / NA
<b>2.1 Guide</b>	<b>Does the DP provide independent assurance directly to the Duty Holder that the Marine SMS is working effectively in ensuring compliance with the Code?</b>	<b>Y</b>
<i>SMS ref.</i>	2.2	
<i>Comment</i>	Make sure frequency of DP reports to board is clear (contract with Marico allows for one annual report).	
<b>2.2 Guide</b>	<b>Does the DP have a thorough knowledge and understanding of the requirements of the Code (and the GTGP) and associated marine legislation?</b>	<b>Y</b>
<i>SMS ref.</i>	2.2	
<i>Comment</i>	WH CV details.	
<b>2.2 Guide</b>	<b>How does the DP Monitor and audit the effective and consistent application of the Marine SMS on port marine / facility operations?</b>	<b>Y</b>
<i>SMS ref.</i>	2.2	
<i>Comment</i>	Through regular visits / formal audit under terms of a formal contract.	

#### 3.2.1 General Comments

There remains an opportunity for the DP to be more regularly informed through receiving (e.g.) reports to HAAC / the Duty Holder, but generally there is a good effective relationship between the DP and the marine team.

### 3.3 LEGISLATION

PMSC / Guide Ref	Requirement	Y / N / NA
<b>3.3 Guide</b>	<b>What is the legislation that's applicable to the organisation in terms port marine safety?</b>	<b>Y</b>
<i>SMS ref.</i>	13.6	
<i>Comment</i>	Jersey Law is detailed in the enforcement section of the manual, but might be more appropriately covered in the introductory sections of the manual, There should be a link to the enforcement and Regulatory Manual.	
<b>3.3 Guide</b>	<b>When did the organisation last carry out a review of its applicable legislation?</b>	<b>?</b>
<i>SMS ref.</i>	13.6 (very brief reference to review)	
<i>Comment</i>	A recent formal review has not been documented, nor is the required frequency of, or trigger for, review explicitly stated.	
<b>3.4 Guide</b>	<b>Can the organisation issue Special Directions and is there provision for this responsibility to be delegated to other persons other than the HM?</b>	<b>Y</b>
<i>SMS ref.</i>	2.3	
<i>Comment</i>	Concept of SDs slightly different under Jersey Law (from UK) – but clearly understood. Verified with VTS staff.	
<b>3.5 Guide</b>	<b>Can the organisation issue General or Harbour Directions?</b>	<b>Y</b>
<i>SMS ref.</i>	3.1.1 / 5.3.2	
<i>Comment</i>	This concept is very clear in Jersey.	
<b>3.7 Guide</b>	<b>Does the organisation have any byelaws?</b>	<b>N</b>
<i>SMS ref.</i>	N/A	
<i>Comment</i>	Harbour Law and Directions mean Byelaws are not required in Jersey.	
<b>3.8 Guide</b>	<b>Does the organisation have any licencing powers?</b>	<b>Y</b>
<i>SMS ref.</i>	11.3	
<i>Comment</i>	Dive and mooring services permits are issued, and there is comprehensive licensing for commercial marine activities. (Reg 6) Overview Manual could give a bit more detail.	
<b>3.9 Guide</b>	<b>Does the organisation have and publish an enforcement policy?</b>	<b>Y</b>

PMSC / Guide Ref	Requirement	Y / N / NA
SMS ref.	13.6 is the policy	
<i>Comment</i>	But not clear if this is published (e.g. as stand-alone policy on website)	
<b>3.10 &amp; 3.14 Guide</b>	<b>Does the organisation have a mechanism for consulting and communicating with port marine stakeholders, contractors and marine staff, e.g. port user groups and employee forums / committees?</b>	<b>Y</b>
SMS ref.	3.1.6	
<i>Comment</i>	But very light on detail, e.g. list of groups, meeting frequency, agenda and minuting arrangements, responsibilities for convening.	
<b>3.12 Guide</b>	<b>Does the organisation have a mechanism for consulting with port marine stakeholders when reviewing risk assessments?</b>	<b>Y</b>
SMS ref.	4.0 – refers to the “Risk Assessment and Safety Management Manual. Section 2.1.	
<i>Comment</i>	Clear that stakeholders should be involved in RA process, but (Apart from Marico NRA) not clear how this is achieved, or that it has been done.	

### 3.3.1 General Comments

Legislation is unique to Jersey and locally well understood and considered appropriate. The MSMS would benefit from an overview in the introductory paragraphs, as this is fundamental to managing marine safety.

Once again, it is noted that policies should be clearly published to inform stakeholders.

Stakeholder consultation appears to be effective but is poorly documented. During the tour of outlying harbours, it was observed that the Harbour Associations were active and had a very good relationship with the Historic Harbours Manager.

### 3.4 DUTIES AND POWERS

PMSC / Guide Ref	Requirement	Y / N / NA
<b>4.5 Guide</b>	<b>Is a pilotage service provided and if so when was the last pilotage review, ?</b>	<b>Y</b>
SMS ref.	9.1	
<i>Comment</i>	Directions last revised January 2025.	
<b>4.5.5 Guide</b>	<b>Is bridge team and resource management principles included in the pilot training syllabus?</b>	<b>N</b>
SMS ref.	9.3	
<i>Comment</i>	Recognised but not formally required. Some pilots "bring qualification with them". principles included in local training.	
<b>4.5.7 Guide</b>	<b>Are pilots subject to regular assessment such as peer review assessment?</b>	<b>Y</b>
SMS ref.	9.8	
<i>Comment</i>	Included in MSMS overview with more detail in the Pilotage Manual and in Pilotage Direction No.1.	
<b>4.5.9 Guide</b>	<b>Are there procedures that prescribes the process of reporting ship deficiencies to MCA?</b>	<b>?</b>
SMS ref.	?	
<i>Comment</i>	Jersey procedures.	
<b>4.5.13 Guide</b>	<b>Are pilotage directions available and regularly reviewed?</b>	<b>Y</b>
SMS ref.	9.6	
<i>Comment</i>	But don't seem to be available form new web page (link goes to NTM page, but they are not there).	
<b>4.5.14 Guide</b>	<b>Are there robust procedures in place that prescribe arrangements for pilot boarding and landing and pilot boat certification and operations?</b>	<b>Y</b>
SMS ref.	Pilotage SOP001 (March 2025)	
<i>Comment</i>	Also risk assessment, revised Jan 2025.	

PMSC / Guide Ref	Requirement	Y / N / NA
<b>4.5.14 &amp; 15 Guide</b>	<b>Are there robust procedures, SSOW and risk assessments in place that prescribe arrangements for pilot boarding and landing? And is the Embarkation and disembarkation of pilots code of practice referenced?</b>	<b>Y</b>
SMS ref.	MOPS RA 002 – Pilot Transfer	
<i>Comment</i>	Regularly reviewed.	
<b>4.5.19 Guide</b>	<b>Are procedures and records available for authorization of pilots?</b>	<b>Y</b>
SMS ref.	9.7	
<i>Comment</i>	Pilotage manual / syllabus, certificates issued to authorised pilots.	
<b>4.5.21 Guide</b>	<b>Is there a policy in place for revalidation of pilots and PEC holders?</b>	<b>Y</b>
SMS ref.	e.g. 9.8 and 9.9 (Check paragraph numbering in manual). Pilotage Manual.	
<i>Comment</i>	All certificates expire annually, requires sufficient number of acts, etc to renew.	
<b>4.5.23 Guide</b>	<b>Are there processes and procedures in place to manage PEC holders?</b>	<b>Y</b>
SMS ref.	9.8 and pilotage manual	
<i>Comment</i>	Includes check trips.	
<b>4.5.25 Guide</b>	<b>Are there procedures in place that support the safe and efficient rostering of pilots and do they ensure fatigue management is considered when assigning acts of pilotage?</b>	<b>Y</b>
SMS ref.	Not formally documented in MSMS, but covered by risk assessment – see 1.10 of pilotage manual	
<i>Comment</i>	This is unusual, but did in fact occur during audit, when pilot self-managed suitable rest breaks.	
<b>4.6.1 Guide</b>	<b>Are towage guidelines and associated risk assessments in place concerning towage and do they include limits for towage in restricted visibility and details of tug master &amp; pilot/ship master exchange of information including ship's speed through the water when making fast?</b>	<b>Y</b>
SMS ref.	10.1	
<i>Comment</i>	Can no longer find this on website, though. ("Code of Practice for towage in the Port of St Helier (Towage Guidelines)").	

PMSC / Guide Ref	Requirement	Y / N / NA
<b>4.6.1 Guide</b>	<b>Is the Pilots' Pocket Guide and Checklist made available to pilots?</b>	<b>N</b>
SMS ref.	N/A	
<i>Comment</i>	While not a legal requirement, it would be sensible to obtain copies of this booklet.	
<b>4.6.1 &amp; 4.7.6</b>	<b>Is there a process in place for tug / workboat operator approval?</b>	<b>Y</b>
SMS ref.	10.3	
<i>Comment</i>	Clear procedure. Used for charter vessels.	
<b>4.6.6 Guide</b>	<b>Is training between tug crews, and pilots supported?</b>	<b>Y</b>
SMS ref.	Pilotage manual?	
<i>Comment</i>	There has been recent training involving all parties in preparation for new ferry services.	
<b>4.7.3 Guide</b>	<b>Is there a process for management / licensing of small commercial vessels and their crew (whether owned or operated by the organisation or not)?</b>	<b>Y/N</b>
SMS ref.	11.2 / 11.3	
<i>Comment</i>	The MSMS has a section on regulation of small craft, but the section for other craft (11.3) is incomplete. "Reg.6" does cover other commercial craft In Jersey waters comprehensively.	
<b>4.8 Guide</b>	<b>Is there a process for regulation and management of commercial diving?</b>	<b>Y</b>
SMS ref.	11.4	
<i>Comment</i>	Described in overview and detailed manuals. The procedures were observed in operation during the audit.	
<b>4.8.2 Guide</b>	<b>Does the organisation control / regulate recreational diving within their jurisdiction?</b>	<b>Y</b>
SMS ref.	GDs	
<i>Comment</i>	Subject to General Directions available on website.	
<b>4.8.3 Guide</b>	<b>Does the organisation regulate the provision of mooring and berthing services and does the Marine SMS refer to supporting procedures &amp; policies?</b>	<b>Y</b>

PMSC / Guide Ref	Requirement	Y / N / NA
SMS ref.	11.5 and section 2.14 of Conservation and Marine Services Manual and Approved Code of Practice on Health and Safety in the Port of St Helier	
<i>Comment</i>	Licensed contractor.	
<b>4.9 Guide</b>	<b>Are emergency plans in place, up to date and regularly exercised?</b>	<b>Y</b>
SMS ref.	Section 6	
<i>Comment</i>	No specific Emergency schedule was found. In practice, exercises are regularly held and followed up, but the MSMS could give more detail.	
<b>4.9.11 Guide</b>	<b>Is an oil spill contingency plan approved and in place and are MCA returns submitted?</b>	<b>Y</b>
SMS ref.	6.4	
<i>Comment</i>	Noted this section of the manual is currently under review / subject to comment.	

### 3.4.1 General Comments

There is a good understanding of duties and powers as they apply at both state and harbour level. The MSMS covers all expected requirements of the Code, with detail generally given in referenced departmental manuals. There are some areas where good practice was observed, but not fully documented in the operations manuals.

### 3.5 RISK ASSESSMENT

PMSC / Guide Ref	Requirement	Y / N / NA
5.2 Guide	<b>Is a formal navigational risk assessment in place, regularly reviewed (including by appropriate stakeholders) on a planned basis or after an incident has occurred?</b>	Y/N
SMS ref.	4.0	
<i>Comment</i>	See comment below.	
5.6 Guide	<b>Is a system of task-based risk assessments in place considering marine tasks undertaken by staff?</b>	Y
SMS ref.	4.2	
<i>Comment</i>	These assessments are comprehensive, up to date and well documented. Examples were reviewed in the office, and also seen during the historic harbours visit (E.g. discussed use of harbour cranes by association members).	
5.7 Guide	<b>Does the organisation place an emphasis on dynamic risk assessment and is this promulgated to staff in training / briefings etc?</b>	Y
SMS ref.	4.0	
<i>Comment</i>	Although Dynamic risk assessment is well understood by staff, and it is mentioned in the MSMS overview in Figure 2 (section 4.2), this section refers to the "Risk Assessment and Safety Management Manual. Section 2.1, where no mention of dynamic risk assessment could be found.	

#### 3.5.1 General Comments

The overarching "tactical" navigation risk assessment as required by the PMSC was completed by Marico Marine in 2019, and a full review has not yet been completed since that date. Such a review has been commenced (and is in fact well advanced). This review should be completed as a matter of urgency, and steps taken in the future to

ensure the NRA is reviewed regularly, or following incidents or changes in operations. (There is no evidence that the NRA was reviewed for the introduction of the new ferries, though comprehensive operational reviews were undertaken.

Detail of Dynamic Risk Assessment requirements and procedures should be recorded ASAP. (Based on good practice already in place).

### 3.6 MARINE SAFETY MANAGEMENT SYSTEM

PMSC / Guide Ref	Requirement	Y / N / NA
<b>6.0 Guide</b>	<b>Is there a safety management system in place which includes procedures, policies, and staff roles and responsibilities?</b>	<b>Y</b>
SMS ref.	Marine Safety Management System Overview document	
<i>Comment</i>	Clear overview supported by referenced detailed documents.	
<b>6.6 Guide</b>	<b>Is there a process for measuring the Marine SMS's performance?</b>	<b>Y</b>
SMS ref.	N/A	
<i>Comment</i>	"Dashboard" and reports to Board by HM. Consider recording what is actually done.	
<b>6.7 Guide</b>	<b>Is there a process for audit and review of the Marine SMS?</b>	<b>Y</b>
SMS ref.	Section 5.4	
<i>Comment</i>	But still need to develop internal audits, which are referred to in the MSMS.	
<b>6.8 Guide</b>	<b>Does the organisation sit within or adjacent to a neighbouring organisation where consideration of overlapping areas of responsibility should be considered, such as bridging documents or MOU's?</b>	<b>N</b>
SMS ref.	N/A	
<i>Comment</i>	Effectively one organisation for Jersey.	
<b>6.9 &amp; 6.9.6 Guide</b>	<b>Does the organisation have incident reporting (including near miss) and investigation procedures in place?</b>	<b>Y</b>

PMSC / Guide Ref	Requirement	Y / N / NA
SMS ref.	13	
<i>Comment</i>	Comprehensively documented.	
<b>4.5.9 Guide</b>	<b>Does the organisation have procedures in place to ensure that ship deficiencies that may adversely affect navigation are reported to the MCA?</b>	<b>N/A</b>
SMS ref.		
<i>Comment</i>	Effectively own Port State Control. Close internal liaison and reporting.	
<b>6.9.10 Guide</b>	<b>Are lessons from investigations published and shared within the organisation with a view to preventing a recurrence?</b>	<b>Y</b>
SMS ref.	Section 13	
<i>Comment</i>	See comment below.	

### 3.6.1 General Comments

With respect to incident reporting and investigation, it has previously been noted that Jersey Harbours are very proactive and hold almost weekly staff meetings to follow up incident reports (Q Pulse meetings) which the DP occasionally observes. However, it remains a concern that outcomes of investigations are not always captured in new procedures, or risk assessment reviews – short term fixes may be effective, but changes in procedures to prevent reoccurrence are less well documented.

The format of the Q Pulse meetings was discussed, and it was recommended that consideration be given to separating out the large number of H&S reports and near misses, from navigational incidents which might lead to reviews of the MSMS or navigational risk assessment. While all incidents should rightly be reported and followed up, there is a danger that navigational incidents are “lost” in the sheer number of other reports.

As a general observation, it is noted that, while a suitable range of policies are in place within the MSMS documents, they would be more usefully separated out into individual documents which could be published (publicly) rather than being in operational manuals only accessible to staff.

### 3.7 REVIEW & AUDIT

PMSC / Guide Ref	Requirement	Y / N / NA
7.1 Guide	<b>Is an annual internal audit and accompanying annual report statement undertaken and published to confirm that the Marine SMS is being operated effectively?</b>	Y
SMS ref.	5.4.2	
<i>Comment</i>	Suggest reviewing section to ensure (e.g.) frequencies of audit are both appropriate and being achieved.	
7.1 Guide	<b>Is an external audit and accompanying marine safety plan undertaken and published against the organisation's performance of the PMSC and the previous version of the marine safety plan at least every 3 years?</b>	N
SMS ref.	5.2.3	
<i>Comment</i>	Reference is made to external audit and a safety plan, but not to publishing.	

#### 3.7.1 General Comments

No additional comment.

### 3.8 COMPETENCE

PMSC / Guide Ref	Requirement	Y / N / NA
<b>8.10 Guide</b>	<b>Is there a published training policy in place?</b>	<b>N</b>
SMS ref.	Not found – see comment at 3.6.1 of this report.	
<i>Comment</i>		
<b>8.3 Guide</b>	<b>Are National Occupational Standards referenced as a basis for recruitment and development of staff?</b>	<b>Y</b>
SMS ref.	12.1	
<i>Comment</i>	Used as a basis for competency requirements in general.	
<b>8.10 Guide</b>	<b>Is a Marine Training Matrix available that describes all of the organisation’s marine personnel and what their training, experience and qualification requirements are (including any refresher training)?</b>	<b>Y/N</b>
SMS ref.	12	
<i>Comment</i>	But not ALL job roles / departments (though most).	
<b>8.10 Guide</b>	<b>Are training records maintained and reviewed (course completion certification etc.)?</b>	<b>Y</b>
SMS ref.	12	
<i>Comment</i>	By department using manual systems. No complete overview or standard software tool (Coastguard has an app!)	
<b>8.10 Guide</b>	<b>Are records of assessment / training maintained (training record books, on the job training records) and used to ensure staff have met the required competencies before being taking on roles and responsibilities?</b>	<b>Y</b>
SMS ref.	12 / departmental manuals	
<i>Comment</i>	Combination of sign off sheets and the competency matrices.	

### 3.8.1 General Comments

With respect to competency, training and authorisations, there were some good examples of procedure and documentation, but the MSMS does not specify a standard, and different departments followed different procedures.

### 3.9 PLAN

PMSC / Guide Ref	Requirement	Y / N / NA
<b>9.1 Guide</b>	<b>Is a marine safety plan published every 3 years?</b>	<b>Y</b>
SMS ref.	5.2.3	
<i>Comment</i>	MSMS says this is published (made public), but not clear where?	
<b>9.1 Guide</b>	<b>Has a report detailing an assessment of the organisations performance against the safety plan been published?</b>	<b>Y</b>
SMS ref.	5.2.4	
<i>Comment</i>	See above.	
<b>9.1 Guide</b>	<b>Were stakeholders consulted as part of drafting the plan?</b>	<b>Y</b>
SMS ref.	5.2.3	
<i>Comment</i>	Again MSMS references consultation, but it was not seen how this was achieved during the course of this audit.	

#### 3.9.1 General Comments

A review of the safety plan and report is recommended.

### 3.10 CONSERVANCY DUTY

PMSC / Guide Ref	Requirement	Y / N / NA
<b>10.3 Guide</b>	<b>Does the organisation provide regular updates on depth of water and other relevant information to UKHO?</b>	<b>Y</b>
SMS ref.	Conservancy Manual, 2.1.2	
Comment		
<b>10.4 Guide</b>	<b>Is timely information on prevailing and forecast meteorological conditions such as wind, tide and other factors made available to users?</b>	<b>Y</b>
SMS ref.	7.0, Conservancy Manual, 2.1.3	
Comment	Web page / app / VTS / Coastguard broadcast / VHF.	
<b>10.5 Guide</b>	<b>Does the Marine SMS make appropriate provision for safe anchorages?</b>	<b>Y</b>
SMS ref.	7.0 and Pilotage manual, Conservancy and Marine Operations Manual. (2.1.6)	
Comment	5 designated and charted.	
<b>10.11 Guide</b>	<b>Does the Marine SMS refer to the identification, management and marking of wrecks?</b>	<b>Y</b>
SMS ref.	Conservancy and Marine Operations Manual. (2.1.7)Also powers to deal with abandoned vessels	
Comment		
<b>10.14 Guide</b>	<b>Does the Marine SMS refer to management of harbour works (permissions, licenses, Notices to Mariners etc.)?</b>	<b>Y</b>
SMS ref.	Conservancy and Marine Operations Manual. (2.1.8)	
Comment		
<b>10.8.9 Guide</b>	<b>Is there a hydrographic survey plan in place and are the results of these surveys promulgated on a regular basis?</b>	<b>Y</b>
SMS ref.	Conservancy and Marine Operations Manual. (2.1.1)	
Comment	Consider making charts available on a wider basis (e.g. PEC holders).	

PMSC / Guide Ref	Requirement	Y / N / NA
<b>10.8.5 Guide</b>	<b>Is the tidal regime, monitored, understood and promulgated (including via UKHO)?</b>	<b>Y</b>
<b>SMS ref.</b>	2.1	
<i>Comment</i>	Good detail on chart data – add detail about tidal data to UKHO etc.	
<b>10.10.4 Guide</b>	<b>Are local Notices to Mariners issued?</b>	<b>Y</b>
<b>SMS ref.</b>	5.33	
<i>Comment</i>	Distributed to mailing list and published on website.	
<b>10.10.1 Guide</b>	<b>Does the organisation have Local Lighthouse Authority responsibilities?</b>	<b>Y</b>
<b>SMS ref.</b>	Conservancy and Marine Operations Manual. (2.1.4)	
<i>Comment</i>		
<b>10.12 Guide</b>	<b>Has the organisation considered any appropriate actions or procedures around managing abandoned or the salvage of vessels?</b>	
<b>SMS ref.</b>	Conservancy and Marine Operations Manual. (2.1.7)	
<i>Comment</i>		
<b>10.15 Guide</b>	<b>Are there procedures in place to support the maintenance and provision of aids to navigation?</b>	<b>Y</b>
<b>SMS ref.</b>	Conservancy and Marine Operations Manual. (2.1.4)	
<i>Comment</i>		
<b>10.15.7 &amp; .8 Guide</b>	<b>Are there procedures in place to support safety of navigation and provide where necessary consistent procedures for those managing LPS or VTS?</b>	<b>Y</b>
<b>SMS ref.</b>	VTS Manual (	
<i>Comment</i>	reviewed in previous audit.	
<b>10.16 Guide</b>	<b>Is there a passage plan in place that describes (often pictorially) how vessels or craft would normally be expected to access the harbour or facility and are these checked periodically?</b>	<b>Y</b>
<b>SMS ref.</b>	Separate document, pilotage procedure	

PMSC / Guide Ref	Requirement	Y / N / NA
<i>Comment</i>	Not clear how the requirement to passage plan is conveyed to PEC holders, or if any checks are made.	
<b>10.16.4 Guide</b>	<b>Is a Master / Pilot Exchange template available and used</b>	<b>Y</b>
<b>SMS ref.</b>	Part of Passage Plan	
<i>Comment</i>	Examples seen.	
<b>10.17 Guide</b>	<b>Does the organisation support the provision of an 'on-water presence' such as harbour patrols and does this include any enforcement functions?</b>	<b>Y</b>
<b>SMS ref.</b>	Not known	
<i>Comment</i>	But there are regular beach controls, marine patrols and an enforcement officer.	
<b>10.18 Guide</b>	<b>Do the organisations stakeholders include recreational users and if so, how are they managed and are there risk assessments in place to mitigate conflicts between commercial and recreational activity users?</b>	<b>Y</b>
<b>SMS ref.</b>	4.0 Risk assessment and 3.0 (consultation)	
<i>Comment</i>	In practice, not clear how this has been achieved since last formal consultation as part of NRA review by Marico.	
<b>10.19 Guide</b>	<b>In terms of event planning and other large-scale activities, is there a requirement for stakeholders to consult / seek permission from the organisation?</b>	<b>Y</b>
<b>SMS ref.</b>	Not known	
<i>Comment</i>	There is a formal permit based system, but not clear where documented, or how promulgated.	
<b>10.23 Guide</b>	<b>Does the organisation license, manage or support the provision of moorings?</b>	<b>Y</b>
<b>SMS ref.</b>	Not known	
<i>Comment</i>	There is very close liaison with outlying harbour associations, who effectively manage moorings under licence – process described during visits to harbours.	
<b>10.24 &amp; 6.8 Guide</b>	<b>Are there any marinas within the organisation's jurisdiction and is there effective liaison between the marina and the organisation?</b>	<b>Y</b>
<b>SMS ref.</b>	Marine Operations manual?	
<i>Comment</i>	All marinas are owned by Jersey harbours.	

PMSC / Guide Ref	Requirement	Y / N / NA
10.26 Guide	Has the organisation considered the provision of appropriate shoreside lifesaving equipment within their jurisdiction?	Y
SMS ref.	Coastguard	
Comment	In co-operation with coastguard, all over island. Includes life-saving apparatus, AEDs etc.	
10.27 Guide	If the organisation has any subsea pipelines or cables within its jurisdiction does the Marine SMS recognise and assess the potential damage that could be caused from shipping and fishing operations and prescribe appropriate mitigations?	Y
SMS ref.	8.5 (brief overview)	
Comment	Mainly on East coast.	

### 3.10.1 General Comments

Once again, almost all expectations of the PMSC have been addressed in this section, although due to time constraints for relevant staff, it was not possible to look at all relevant parts of the MSMS for detail. The auditor has a slight concern that some good work (e.g. permitting events, works, etc.) while well documented, is not clearly promulgated to relevant third parties, either because there are no suitable public facing documents, or they simply cannot be found on the current website.