



UNSCRAMBLING SHIP SECURITY ASSESSMENTS

SAFETY MANAGEMENT SYSTEMS, LLC

The ISPS Code requirement for performing Ship Security Assessments (SSA) is a greater challenge than the subsequent documentation of the Ship Security Plan (SSP). Why is this?

Recognize that the SSA is less a document and more a process that combines methodologies, including risk management, process review as well as threat and gap analysis.



Reviewing part A Section 8 of the ISPS Code “Ship Security Assessment” reveals that the SSA is to be carried out taking into account guidance provided in part B. The guidance provided in part B is what needs to be adhered to as part A provides just an overview of what needs to be included within a SSA.

Turning then to part B Section 8 of the Code it is quickly determined that the “guidance” provided in this section does little to assist individuals charged with performing the SSA in actually coordinating the assessment process. Where to begin?

The SSA process should be viewed as being comprised of phases that lead to a comprehensive determination of security vulnerabilities and countermeasures that could be employed to reduce them.

The importance of tracking progress within each phase and towards completion of the SSA in its entirety cannot be understated. The Norwegian Shipowners' Association, Republic of Liberia, Lloyd's Register and other organizations have provided examples of possible formats for coordinating, recording and monitoring progress of the SSA. There are wide differences amongst the examples and it is recommended that those charged with performing the SSA develop their own format drawing upon the examples for guidance.

Phase One

Facts and figures. The SSA begins with assembling pertinent information and details as specified by part B Section 8.5. As this section of the Code identifies 13 sources of information to be used in conducting the SSA, it is essential that those performing the assessment develop a system for keeping this information organized and secure from unauthorized parties.

Phase Two

Think globally – act locally. To gain a sense of where the greatest vulnerabilities to the ship may reside, the SSA continues with a consideration of all possible threats. As a minimum the consideration must include threats identified in part B Section 8.9. It is possible that other threats may be identified that exceed the 9 provided as guidance, though it is recommended that the focus be applied to those provided in Section 8.9.

The consideration of threats should be guided by recognized risk management tools such as those detailed in the United States Coast Guard Navigation and Vessel Inspection Circular Number (NVIC) 10 02 Appendix B “Guidance on Performing Security Assessments”. Numerous Administrations have recognized the value of performing the analysis of threats in concert with the recommendations of NVIC 10 02. It is strongly recommended that the NVIC is considered especially for companies whose ships trade in US waters.



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Phase Three

Look, listen and learn. The SSA proceeds with the completion of an on-scene survey as guided by part B Section 8.14. While Section 8.14 details just 7 areas to be reviewed onboard, the additional purpose of the on-scene survey is to review and confirm information obtained from the previous phases. The best way to view the on-scene survey is as a combination of internal audit and review of the ship's structural arrangements, equipment and operations.

Phase Four

Keep it simple. At the conclusion of the on-scene survey and upon considering information obtained from the previous phases, the final phase of the SSA includes summarizing vulnerabilities and countermeasures as specified by part B section 8.12. These results should be concisely documented while providing sufficient details. Be mindful of the need to submit the SSA with the SSP to the Recognized Security Organization (RSO). As the results of the SSA shall be scrutinized by the RSO for consistency with the SSP during review of the Plan for approval, strive for accuracy and completeness.

Part B Section 8 of the ISPS Code provides over four pages of guidance to performing the SSA. That the guidance does not illustrate the path towards implementing a process-based approach to completing the SSA complicates matters for most of us.

By following the simplified four phase process proposed here, it is likely that those responsible to perform the SSA will have greater ease and an appreciation for how the guidance provided in part B can be applied to the assessment process.

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The recommendations provided in the previous paragraphs provide summarized guidance only and should not be construed to detail all mandatory considerations for ensuring complete regulatory compliance.