



# **International Standard for maritime Pilot Organizations**

## **Part A**

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**AMENDMENT PAGE**

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8	17.06.09	Amendment after comments during the IUG meeting.	H. vd Lugt B. Dockx M.J. vd Hoek	G. Devis	IUG

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## FOREWORD

The last decades have seen a substantial increase in maritime legislation and regulations. By means of applying tacit acceptance procedures at IMO, amendments to international conventions are introduced on a yearly basis. Several severe shipping accidents have resulted in a number of additional mandatory requirements. However the need to limit new legislation in favour of enforcing the existing requirements has been recognized by IMO. This is documented in "IMO Resolution A.500 (XII)" stating the objectives of the Organization that *"the Council and the Committees entertain proposal for new conventions or amendments to existing proposals only on the basis of clear and well-documented demonstration of compelling needs having regard for the costs to the maritime industry and the burden on the legislative and administrative resources of Member States."*

Also the European Committee favours maritime related industry self-regulation, as is mentioned in "The Maritime Industry Charter on Quality" in which representatives of international maritime and maritime related industries recognized *"the contributory effects of industry self-regulation through voluntary codes of best practice and guidelines* and they agreed to subscribe that *industry associations shall reflect their principles stated in any Charter and/or Code of conduct and shall encourage their members to observe these principles at all times."*

Industry self-regulation has been heralded as a necessary and welcome addition or even replacement for the traditional compliance and survey based systems. However, the term self-regulation has to be more clearly defined. In other industries self-regulation has been used as a means of preventing implementation of governmental regulations to achieve the same result.

Self-regulation by a branch organization on behalf of members can be beneficial and implemented in two parts:

- self-regulation of the whole branch or sections of the services to encourage uniform standards;
- an independent external audit system to check the Safety and Quality Management Systems instigated in accordance with maritime standards and industrial company requirements.

Therefore the International Standard for maritime Pilot Organizations (ISPO) was set up. This standard encompasses features that can help an individual maritime pilot organization to be consistent in meeting its users'/customers' requirements. It does not impose something totally new. Safety and quality management systems are about evaluating how and why activities or processes are done and about recording the results to show that they are done as intended. A well-run organization does not need to change any of its working practices to meet this standard.

Some pilot services users/customers in both private and public sectors expect to be given confidence by a maritime pilot organization that has a safety and quality management system certified by an independent external certifying organization.

Meeting these expectations is one reason for having a safety and quality management system; there are other reasons that are just as important:

- improvement and quality of efficient services and port safety
- promoting safety for clients, pilots and pilot supporting organizations
- insurance advantage
- benefiting from the problems experienced and reported by others
- elevating the standing of maritime pilot services within the maritime industry

The responsibility for the standard lies with the International Users Group of ISPO-certified organizations (IUG).

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The IUG is responsible for:

- maintenance and further development of the standard.
- communication between ISPO-certified organizations and informing ISPO-certified organizations and other interested parties in relation to:
  - the contents of the standard and all supporting documents
  - the recognizing of classification societies
  - ISPO-certification in general
- supporting potential members and other interested parties in relation to the implementation of the standard.
- recognition and authorisation of classification societies as independent bodies for ISPO-certification.
- administration of certificates; certified organizations and authorized classification societies.

All ISPO-certified Pilot Organizations that are members of IMPA can indicate whether they want to be a participating member of the IUG.

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## 1 INTRODUCTION

### 1.1 General

1.1.1 The basis for the International Standard for maritime Pilot Organizations (ISPO) is the applicable International Maritime Organization's (IMO) Conventions, Resolutions and Recommendations - i.e. Standards of Training Certification and Watchkeeping (STCW) Convention, Safety of Life at Sea (SOLAS) Convention, International Safety Management (ISM) Code - and the guidelines and recommendations issued by the International Maritime Pilots' Association (IMPA) and the European Maritime Pilots' Associations (EMPA).

1.1.2 For each designated area where maritime pilotage is executed, an individual interpretation of the ISPO is required and hence each item in the ISPO shall be assigned to the party concerned according to the national and/or regional rules, regulations, customs and traditions.

1.1.3 Recognizing that:

- no two maritime pilot organizations are the same and that pilotage services in port and fairway environments operate under a wide range of different conditions and
- the identified maritime pilot organizations can be, but need not be restricted to the following examples: Competent Authority, Captain of the Port (COTP), Harbour Master, VTS Authority, Pilot Association, Coastguard and Pilot Commission, either independent or assigned as an agent or instrument of the Competent Authority;
- the expression 'maritime pilot organization' is used to indicate the party responsible for ISPO compliance. This party shall ensure that the implementation of each applicable ISPO item is not in conflict with national and/or regional rules, regulations, customs and traditions and shall satisfy the authorized external auditor that each applicable ISPO item is covered.
- each interpretation of the ISPO shall always respect the individual and autonomous status of the maritime pilot as defined in the national and/or regional rules and regulations. Consequently, ISPO does not place control or responsibility on the maritime pilot organization for the acts of individual maritime pilots on board vessels under pilotage.

### 1.2 Scope

1.2.1 The objectives of the ISPO are:

- to ensure that the activities of the maritime pilot organization are administered, so as to provide a quality service with due regard to the safety of human life and the avoidance of damage to environment and property;
- to encompass existing good practice and
- to provide a recognizable system for international application that can be audited.

1.2.2 The management objectives of the ISPO are:

- to ensure safe practice;
- to establish safeguards against all risks identified;
- to continuously improve safety management practices within the maritime pilot organization;
- to provide an organizational structure, procedures, processes and resources needed to administer the activities of the maritime pilot organization;
- to continuously improve quality management practices, by keeping records to verify that the procedures are being followed;
- to continuously improve the quality of the service;
- to determine and implement effective arrangements for communication with customers.

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- 1.2.3 The safety and quality management system shall ensure:
- compliance with mandatory local, national and international rules and regulations;
  - that relevant guidelines and standards recommended by recognized maritime industry organizations are taken into account;
  - that relevant and recognized customs and traditions are taken into account.

### 1.3 Application

- 1.3.1 The requirements of the ISPO are of a general nature and applicable to all maritime pilot organizations, disregarding their size and organizational structure.
- 1.3.2 Where any requirement(s) of the ISPO do not apply due to the nature of a regional maritime pilot organization and its services, they can be considered for exclusion.
- 1.3.3 Where one or more exclusions are made, claims of conformity to the ISPO are not acceptable unless these exclusions do not affect the organization's ability or responsibility to provide services that meet customer and applicable regulatory requirements. These exclusions shall be subject to the approval of the classification society.

### 1.4 Certification

- 1.4.1 Each maritime pilot organization that complies with the requirements of the ISPO will be issued an 'ISPO Certificate of Compliance' (ICC).

The ICC shall be issued following verification that the safety and quality management system of the organization complies with the requirements of the ISPO on satisfactory completion and determination of objective evidence, proving that it is effectively implemented.

The ICC shall be issued for a maximum period of five years.

The ICC shall be issued by an independent external auditing (third party audit) organization or association, recognized and authorized by the International Users Group.

- 1.4.2 Periodical audits are to be carried out once a year. In the five-yearly cycle of the validity of the certificate all sites and branch offices need to have been visited.

The certificate shall be withdrawn in case of non-compliance with the requirements specified in the ISPO, such as:

- the periodical verification is not requested;
- evidence of a major non-conformity with the requirements specified by the ISPO or
- evidence of a non-conformity with the requirements specified by the ISPO and no corrective action is being implemented before the next audit.

- 1.4.3 The ICC can be withdrawn by the same certifying organization that issued the certificate.

#### 1.4.4 Recognized organization

All organizations and associations recognized and authorized by the IUG to issue "ISPO Certificate of Compliances" shall have:

- suitably qualified and experienced personnel;
- a Quality System Certification Scheme (QSCS) to set, monitor and maintain uniformity and consistency of internal operations.



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## 1.5 ISPO Configuration

### 1.5.1 The ISPO comprises:

- Part A

This part contains mandatory provisions giving the minimum standard for full compliance with the ISPO, when adopted by the pilot organization.


- Part B

The ISPO guidelines contain recommended guidance to assist implementation of the ISPO in a uniform manner. The measures suggested in these guidelines are not mandatory and the examples given are only intended to illustrate how certain ISPO requirements can be complied with. They shall, however, be taken into account.

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## 2 DEFINITIONS


- The *International Standard for maritime Pilot Organizations* (ISPO) is a standard for maritime pilot organizations.
- *Safety and Quality Management System* means the combination of the elements in the quality management system and the safety management system, where:
  - *Quality Management System* means an organizational structure, procedures, processes and resources essential for a quality service;
  - *Safety Management System* means an organizational structure, procedures, processes and resources essential for the implementation of safety, occupational health, security and environmental protection practices.
- The *Competent Pilotage Authority* means either national or regional governments or local groups or organizations that by law or tradition, administer or provide a pilotage system.
- The *Pilot Organization* as used in this document is an organization, association or person, as determined by national rules and regulations, tradition or custom that provides maritime pilotage services and/or support to these services.
- The *Maritime Pilot* is either a deep-sea pilot or any other maritime pilot who is authorized by the competent authority to carry out pilotage services in a designated area, and who holds appropriate documentation issued by the competent authority.
- *Pilotage Services* means services to ships offered by a maritime pilot. Such services include but are not restricted to:
  - deep-sea pilotage;
  - coastal pilotage;
  - sea pilotage (from sea to port or vice versa);
  - shore-based pilotage;
  - river, canal, docking and harbour pilotage.
- The *ISPO Certificate of Compliance* is a document issued by an organization or association authorized by the International Users Group of ISPO-certified organizations (IUG), which states that the Maritime pilot organization complies with the requirements of the ISPO.

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### **3 FUNCTIONAL REQUIREMENTS ISPO MANAGEMENT SYSTEM**

Every maritime pilot organization shall develop, implement and maintain a safety and quality management system which includes the following minimum functional requirements:

- a safety, environmental protection and quality policy;
- identification of the processes needed for the safety and quality management system and the application throughout the organization;
- instructions and procedures to ensure safe practice while providing pilotage services and support to these services;
- communication procedures between and amongst shore operations and shipboard personnel;
- procedures for reporting non-conformities, accidents and hazardous occurrences that may jeopardize the management system;
- procedures to ensure that all maritime pilots under its management are qualified, certificated and medically fit;
- compliance with any local, national and international regulations where applicable;
- procedures for internal verification, review, analysis and evaluation.

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## **4 DOCUMENTATION REQUIREMENTS ISPO MANAGEMENT SYSTEM**

### **4.1 General**

- 4.1.1 The maritime pilot organization shall establish and maintain procedures to control all documents and records (in any form, type of medium) relevant to the management system.
- 4.1.2 The documentation of the safety and quality management system shall include:
- documented statements of a policy and objectives;
  - documented procedures and registrations of records required by this standard;
  - documents, including the applicable registrations of records, needed by the organization to ensure the effective planning, operation and control of its processes;
  - a safety and quality manual.
- 4.1.3 The maritime pilot organization shall ensure that:
- valid documents are available at all relevant locations and brought to the attention of all persons concerned with the safety and quality management system;
  - changes in documents are reviewed and approved by authorized personnel and
  - outdated documents are promptly removed.
- 4.1.4 Documentation shall be kept in a way considered most effective by the maritime pilot organization..

### **4.2 Safety and Quality Manual Requirements**

- 4.2.1 The safety and quality management system documentation shall include a safety and quality manual that contains:
- the issue and scope of the safety and quality management system which shall include (if applicable) the exclusions and the justification of these exclusions;
  - all procedures, or make reference to these procedures affecting the safety and quality management system of the pilot organization;
  - a description of the interaction between the processes that are part of the safety and quality management system of the pilot organization.

### **4.3 Control of Documents**

- 4.3.1 Documents required by the safety and quality management system shall be controlled by procedures to:
- approve documents for adequacy before publication;
  - ensure that changes in documents are identified and registered;
  - ensure that relevant versions are used and to prevent unintended use of outdated documents;
  - ensure that documents of external origin are identified and distributed;
  - review and update documents if necessary.

### **4.4 Control of Records**

- 4.4.1 A procedure shall be established to define the controls needed for the identification, storage, retrieval and disposition of records
- 4.4.2 Records shall be established and kept to provide evidence of conformity to requirements and to effective operation of the safety and quality management system.

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## **5 MANAGEMENT RESPONSIBILITY**

### **5.1 General**

- 5.1.1 The maritime pilot organization shall define and document the responsibility, authority and interrelation of all personnel who manage, perform and verify work relating to pilotage services and the support to these services.
- 5.1.2 The maritime pilot organization's management shall review the safety and quality management system at defined intervals to ensure suitability and compliance with the ISPO requirements.
- 5.1.3 The maritime pilot organization shall ensure that the policies under chapter 3 are implemented and maintained at all levels of the organization.
- 5.1.4 The maritime pilot organization shall establish and maintain a procedure to identify and have access to legal requirements that are applicable to quality aspects of its services.
- 5.1.5 The maritime pilot organization is responsible for ensuring that adequate resources are provided to enable the designated person (under paragraph 5.3) to perform his/her functions.
- 5.1.6 The maritime pilot organization shall establish resources to support individual pilots to constrain post traumatic stress.

### **5.2 Role of the Maritime Pilot**

- 5.2.1 The maritime pilot organization shall define the role of the maritime pilot in relation to the management system.
- 5.2.2 The maritime pilot organization shall define the maritime pilot's individual responsibility and accountability with regard to:
- implementing the safety, environmental protection and quality policy of the pilot organization;
  - proper professional behaviour while providing pilotage services and
  - compliance with the maritime pilot organization's established policies and procedures.

### **5.3 Designated Person**

- 5.3.1 In order to ensure that the safety and quality management system fulfils its objectives, the maritime pilot organization shall appoint a designated person whose duty is to monitor the safety, environmental protection and quality aspects of the system.
- 5.3.2 When performing his functions, the designated person is to act independently of any other functions or activity in the pilot organization.
- 5.3.3 The designated person shall be experienced in the aspects of pilotage services and the support to these services, and shall be fully conversant with the safety and quality management system of the pilot organization.
- 5.3.4 The designated person shall have the independence and authority to report on the performance of the safety and quality management system to the maritime pilot organization's management.

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## **6 RECRUITMENT, TRAINING & QUALIFICATION**

### **6.1 General**

- 6.1.1 The maritime pilot organization shall:
- determine and document the necessary competence for personnel performing work affecting safety and quality of services offered;
  - take the necessary actions to secure that the required competences are achieved and maintained at all times;
  - evaluate the effectiveness of the actions taken;
  - ensure that its personnel are aware of the relevance and importance of their activities and how they contribute to the achievement of the safety and quality objectives;
  - keep appropriate records of education, training, skills and experience.
- 6.1.2 The maritime pilot organization shall ensure that all personnel involved in the organization's safety and quality management system have an adequate understanding of all relevant rules, codes, regulations and guidelines.
- 6.1.3 The maritime pilot organization shall establish and maintain procedures for identifying any training that may be required in support of the safety and quality management system and ensure that such training is provided for all personnel concerned.
- 6.1.4 The maritime pilot organization shall establish a recruiting procedure to ensure that the applicants for maritime pilots possess the capabilities to undertake the work of a maritime pilot.
- 6.1.5 The maritime pilot organization shall ensure that all maritime pilots under its management are qualified and certificated to perform their work in accordance with their safety and quality management system as well as local, national and international requirements where applicable.

### **6.2 Medical Fitness of Maritime Pilots**

- 6.2.1 The maritime pilot organization shall ensure that all maritime pilots under its management are medically fit to perform their work in accordance with their management system.
- 6.2.2 All maritime pilots and applicants shall at least meet the medical fitness standards of health as required for officers in charge of a navigational watch under the latest version of the Standards of Training, Certification and Watchkeeping convention 1978. However, where local, national and international requirements are more stringent, these requirements shall prevail.

### **6.3 Training, Qualification and Certification of Maritime Pilots - General**

- 6.3.1 The maritime pilot organization shall establish and maintain an adequate training programme for maritime pilots.
- 6.3.2 The maritime pilot organization shall ensure that all maritime pilots under its management are properly trained and qualified in accordance with their safety and quality management system as well as with local, national and international requirements where applicable.
- 6.3.3 Where a maritime pilot organization already exists, part of the practical training of apprentice pilots shall be carried out on vessels under pilotage by maritime pilots licensed for the area concerned where the apprentice will be licensed.

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- 6.3.4 The maritime pilot organization shall keep records of all necessary pilot's certificates/licenses. If applicable these documents shall:
- be issued by or on the advice of the pilot organization;
  - state the designated area(s) they cover and ship types, sizes etc.;
  - provide information on the length and conditions for which they remain valid;
  - have facilities for updating and extending their validity.
- 6.3.5 The body that issues the pilot's certificate or license shall be determined by national or local rules and regulations, agreements, traditions or custom.
- 6.3.6 The pilot organization shall establish proficiency training in order to keep abreast of future changes due to technological developments.
- 6.3.7 The maritime pilot organization shall establish and maintain a system for the administration / registration of the maritime pilots, which shall include at least the following information:
- general information;
  - record of pilotage service (experience and qualifications);
  - training records;
  - medical fitness.
- 6.3.8 The maritime pilot organization shall establish and maintain an identification system for its maritime pilots.

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## **7 PILOT OPERATIONS**

### **7.1 The Maritime Pilot**

7.1.1 The maritime pilot shall undertake actions to perform his services at a high level of safety and quality. Therefore he creates the necessary conditions in relation to education, training, medical fitness and communication with the bridge team.

### **7.2 Communications**

7.2.1 The pilot organization shall establish procedures to verify that proper communication between the vessel's master or his representative, the maritime pilot, and port/fairway related services is maintained prior to and during the pilotage passage. The lines of communication between other interested parties shall also be defined.

### **7.3 Passage Planning**

7.3.1 The pilot organization shall establish procedures for the preparation, planning and execution of the pilotage passage, with due consideration to local, national and international requirements and local best practice.

### **7.4 Vessel Traffic Service (VTS)**

7.4.1 Where a VTS system is established, the pilot organization shall verify that proper communication between the pilot organization, the maritime pilot and the VTS authority is maintained during the execution of pilotage services, and that all formal agreements between the pilot organization and the VTS authority are documented in the management system.

7.4.2 The pilot organization shall verify that any system used during the pilotage passage, for communication between the pilot organization, the maritime pilot and the VTS authority is properly organized when data is transferred between the VTS and the vessel under pilotage to support the pilotage service.

### **7.5 Embarking and Disembarking**

7.5.1 The pilot organization shall establish and maintain procedures for the safe embarking and disembarking of the maritime pilot, in accordance with local, national and international guidelines and recommendations.

7.5.2 The pilot organization shall establish clear requirements and restrictions regarding maritime pilot transfer arrangements and issue notices to mariners, vessel owners and their representatives.



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## **8 LOGISTIC OPERATIONS**

### **8.1 General**

- 8.1.1 The pilot organization shall establish and maintain a system for logistic operations for maritime pilots that shall include:
- pilot scheduling and
  - pilot transport.


The system can be an integral part of the pilot organization or a separate entity working for the pilot organization.

### **8.2 Pilot Scheduling**

- 8.2.1 The pilot organization shall for the purpose of managing fatigue, alertness and endurance in pilotage services:
- maintain rules or instructions to ensure that the maritime pilot will not be required to be on duty for excessive hours;
  - establish a monitoring system for working hours to identify deviations from the regular work time and to control rules or instructions;
  - ensure that all maritime pilots work under conditions as required by local, national or international rules and regulations and
  - set up a system that allows maritime pilots to be released from duty before their work is impaired by fatigue.

### **8.3 Transport Operations**

- 8.3.1 The pilot organization shall ensure that all transport services used in support of the pilotage services comply with applicable local, national and international rules and regulations, as well as with the maritime pilot organization's management system.
- 8.3.2 The pilot organization shall ensure that all transport services supporting the pilotage services are provided with adequate quality and with due regard to safety of human life and avoidance of damage to the environment and property.
- 8.3.3 The pilot organization shall ensure that any separate organization(s) providing transport services for maritime pilots, have established procedures, plans and instructions to cover the safe operation of the transport carrier and the personnel on board, as well as to cover the prevention of pollution.
- 8.3.4 The pilot organization shall ensure that organizations providing the transport services have clearly defined the responsibility, authority and interrelation on board every means of transport. It is the maritime pilot organization's responsibility to ensure best practice is maintained by all personnel involved in their system for logistic operations for maritime pilots.

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## **9 EMERGENCY PREPAREDNESS**

### **9.1 Pilot Operations**

- 9.1.1 The pilot organization shall establish and maintain procedures for responding to potential emergency situations related to the pilotage passage.
- 9.1.2 The emergency procedures shall be consistent with any port/fairway procedures already in place.

### **9.2 Transport Operations**

- 9.2.1 The pilot organization shall ensure that procedures and permissions are in place to enable a rapid and effective response to potential transport operational emergencies.
- 9.2.2 The pilot organization shall ensure that programmes for drills and exercises to prepare for emergency actions involving transport operations are in place and executed.

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## **10 CUSTOMER RELATED PROCESSES**

### **10.1 General**

10.1.1 The pilot organization shall determine:

- requirements specified by the customer;
- requirements not stated by the customer but necessary for specified services;
- statutory and regulatory requirements related to the services;
- additional requirements determined by the pilot organization.

10.1.2 The pilot organization shall review the requirements related to the services. This shall be conducted prior to the organization's commitment to supply services to the customer and shall ensure that the organization has the ability to meet the defined requirements.

10.1.3 Records of the results of the review and actions arising from the review shall be kept.

### **10.2 New Services or Changing Existing Services**

10.2.1 In case new services are planned or existing services are planned to be changed the organization shall determine the following, as appropriate:

- the requirements needed to provide the service;
- the need to establish new processes or to change existing processes;
- the records needed to provide evidence that the requirements have been reached.

10.2.2 Furthermore, the pilot organization shall ensure that relevant documents are amended and that personnel involved are made aware of the changed requirements before acceptance.

### **10.3 Control of Monitoring and Measuring**

10.3.1 As one of the measurements on the performance of the management system, the organization shall monitor information relating to customer perception as to whether the organization has met customer requirements. The methods for obtaining and using this information shall be determined.

### **10.4 Customer Communication**

10.4.1 The pilot organization shall determine and implement effective arrangements for communicating with customers in relation to:

- service information;
- enquiries and arrangements in relation to services;
- customer feedback (complaints and perception).

10.4.2 The pilot organization shall set up a procedure to handle customer feedback (complaints and perception).

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## **11 RISK, INCIDENT AND ACCIDENT MANAGEMENT**

### **11.1 General**


- 11.1.1 The pilot organization shall maintain a system to identify, manage and mitigate risks continuously.
- 11.1.2 The management shall support actions to minimize well-known risks, potential new risks or consequences of incidents, accidents and hazardous occurrences.
- 11.1.3 The pilot organization shall maintain a documented system to ensure that non-conformities, incidents, accidents and hazardous occurrences are reported, investigated and analyzed as necessary with the objective of improving the management system.

### **11.2 Risk Management**

- 11.2.1 The need for safety and risk assessments shall be determined by the management and shall be based on:
- Regional circumstances
  - Responsibilities, authority and tasks of the regional pilot organization

### **11.3 Reports and Analyses of Incidents, Accidents and Hazardous Occurrences**

- 11.3.1 The safety and quality management system shall include procedures ensuring that non-conformities, incidents, accidents and hazardous occurrences are reported, investigated and analyzed with the objective of improving safety and minimizing risk.
- 11.3.2 Investigation reports shall contain at least:
- the definition of the problem;
  - hazard identification;
  - risk assessment.
- 11.3.3 In case risks are determined suitable measures shall be taken.

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## **12 MEASUREMENT, ANALYSES AND IMPROVEMENT**

### **12.1 General**

- 12.1.1 The pilot organization shall establish and maintain procedures to ensure that non-conformities, incidents, accidents, hazardous occurrences and complaints are reported, investigated and analyzed as necessary with the objective of improving the management system.
- 12.1.2 The pilot organization shall periodically evaluate the safety and quality management system and, if necessary, review the management system in accordance with the findings of these evaluations.
- 12.1.3 The initial results of the assessments shall be brought to the attention of the personnel responsible for the area assessed for constructive comment, before corrective measures are considered for implementation.

### **12.2 Internal Audits**


- 12.2.1 The organization shall conduct internal audits at planned intervals to determine whether the management system:
- conforms to the planned arrangements, to the requirements of this standard and to the management system requirements established by the organization, and
  - is effectively implemented and maintained.
- 12.2.2 An audit programme shall be planned, taking into consideration the status and importance of the processes and pilot areas to be audited, as well as the results of previous audits. The audit criteria, scope, frequency and methods shall be defined. Selection of auditors and conduct of audits shall ensure objectivity and impartiality of the audit process. Auditors shall not audit their own work.
- 12.2.3 Responsibilities and requirements for planning and conducting audits, and for reporting results and keeping records shall be defined in a procedure.
- 12.2.4 The management responsible for the area being audited shall ensure that actions are taken without undue delay to eliminate detected nonconformities and their causes. Follow-up activities shall include the verification of the actions taken and the reporting of verification results.

### **12.3 Analysis**

- 12.3.1 The pilot organization shall have a system for recording, investigating, evaluating, reviewing and analyzing reports in order that appropriate action to achieve improvement of its management system can be taken.

### **12.4 Continuous Improvement**

- 12.4.1 The organization shall continually improve the effectiveness of the management system through the use of quality policy, quality objectives, audit results, analysis of data, corrective and preventive actions and management review.

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## 12.5 Management Review

- 12.5.1 The pilot organization shall conduct management reviews based on:
- analyses of incidents, accidents, hazardous occurrences and non-conformities;
  - audit findings;
  - customer feedback (complaints and perception)
  - recommendations for updating the management system as a result of changes in the organization's business environment, new regulations or changes in social and environmental attitudes.
- 12.5.2 The pilot organization shall ensure that all records derived from the management review, i.e. findings, conclusions, recommendations and action plans, are documented and kept.