

DMA RO Circular no. 032

Remote survey/audit

Guidance to Recognised Organisations (RO) and Recognised Security Organisations (RSO) for accept of remote surveys and audits on Danish flagged vessels and their companies.

1.0 Introduction

'Survey' and 'audit' is a process for verifying that a vessel, its crew, its procedures and its equipment complies with relevant international Conventions, specific regulations or requirements of the Danish Maritime Authority (DMA). The established manner of performing such a verification is through the actions of a duly authorised surveyor/auditor on board the vessel to observe condition, witness certain tests, interview crew members and review/accept relevant documentation before crediting the survey/audit as complete when found satisfactory. A 'remote survey/remote audit' is a survey/audit where the verification is undertaken, or partially undertaken, without physical attendance on board by the surveyor/auditor, but remotely by online digital means or equivalent.

2.0 Remote surveys

2.1 Assessment of remote surveys

The DMA does not allow full periodical surveys to be carried out remotely (except stand-alone verification of periodical radio survey, when the vessel has been attended by an authorised service technician).

The DMA accepts the following remote surveys:

- occasional surveys
- survey of minor outstanding items after a periodical survey
- stand-alone periodical radio surveys,
- handling of conditions etc.

The following considerations **shall** be addressed by the RO:

- Justification for the use of remote methods for the survey.
- The scope of the remote survey, with consideration to those items that should be verified remotely for compliance with classification and/or statutory requirements, including applicable performance standards or acceptance criteria, shall achieve the same level of assurance and equivalence when compared to physically attended surveys. Items that cannot be verified remotely shall be verified by on-site survey.
- The RO shall assess the vessel's general performance.
- The RO shall assess whether the scope of the remote survey compromises the safety of the vessel, crew or the environment.
- Procedures in place ensuring assessment of appropriate means of how the remote survey will be carried out (eg. video streaming, pictures, Master's statement, technician's reports)

- etc.)
- The qualifications of crew involved in the physical survey activities on board ship and of the RO surveyors performing remote survey.
 - Availability of crew with reference to rest hour considerations

If the RO assesses a remote survey is possible, as per above mentioned considerations, the survey can be carried out.

If the RO has any doubts, the DMA shall be contacted for acceptance.

2.2 Communications with DMA in connection with remote surveys

After the survey, the RO sends a short notification to the DMA (ro@dma.dk) with the following information:

- Type of remote survey conducted
- The result
- If it has been decided to follow up with on-site attendance
- When the on-site attendance, if any, is planned (eg. asap, next periodical survey etc.)

3.0 Remote audits

3.1 Assessment of remote audit/verification for on board Interim/Initial/Intermediate/Renewal of SMC, ISSC and MLC

Remote audit/verification for Interim/Initial/Intermediate/Renewal of SMC, ISSC and MLC shall only be considered for situations, where it is impossible for the surveyor to attend the vessel. This requires exceptional circumstances such as COVID-19 restrictions, extreme weather condition etc.

The DMA handles requests for remote audits/verifications case-by-case. Requests shall follow the 'Roadmap for processing requests for interpretations, equivalents and exemptions' as laid out in the Annex to the RO agreement, section 6. The following factors shall be included in the request:

- The RO/RSO shall justify why a surveyor cannot attend the vessel.
- The RO/RSO must prepare a plan for how the audit can be performed remotely and a risk assessment of whether the audit can cover the full scope.
- In the risk assessment the DMA expects ROs/RSOs to take account for following considerations:
 - The vessel is ready for remote audit/verification with regard to online connection for
 - web-meeting
 - Sharing of documents
 - Plans are in place for a "tour of the vessel."
 - Is it ensured that interviews can take place in solitary, to enable the crewmember to speak in confidence.

- Consideration for GDPR¹ is in place when transferring data and documents to and from the RO/RSO auditor
- The vessel's general performance.
- The qualifications of crew involved on board the ship and of the auditors performing remote audits/verifications.
- Availability of crew with reference to rest hour considerations.

3.2 Assessment of remote on-shore DOC audit.

The DMA can accept remote and partly remote audit of DOC, based on a request by the RO. The following factors shall be included in the request:

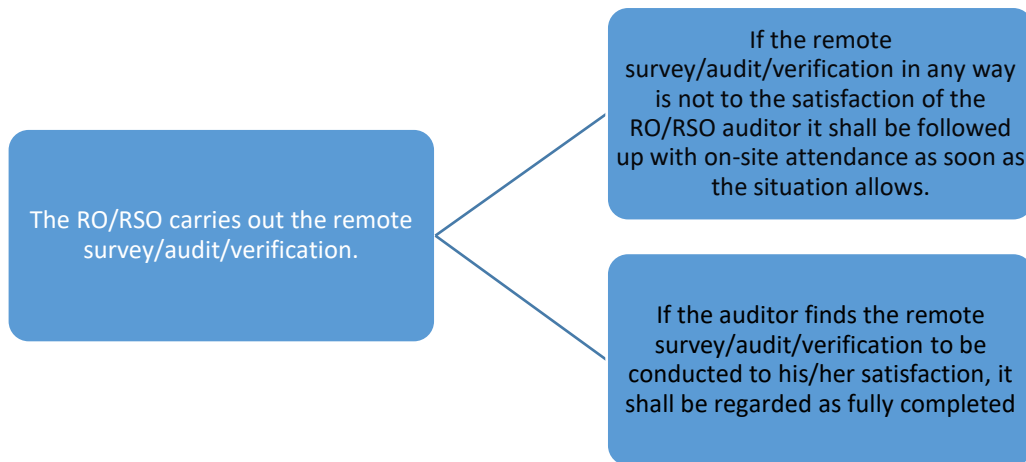
- It must be justified why a remote audit is requested. (I.e. travelling restrictions, synergy of auditing main and branch offices simultaneously etc.)
- The RO must prepare a plan for how the audit can be performed remotely and an assessment of whether the audit can cover the full scope.
- The DMA expects the RO to take into account at least the following considerations:
 - It has been tested that an online connection can be established
 - Interview
 - Sharing documents
 - GDPR¹ has been taken into account when sending documents to the RO.
 - The company's general performance.

3.3 Communications with DMA in connection with remote audits

- If the RO/RSO assesses that, a remote audit/verification is possible a request shall be sent to the DMA (ro@dma.dk). The request shall contain above listed considerations and RO/RSO's recommendation of a remote audit/verification.
- The DMA will revert with refusal or accept (and conditions if any) – or additional questions.
- After the audit and if requested by the DMA, the RO/RSO reverts with a short notification to the DMA on the result, and on whether it has been decided to follow up with on-site attendance.

¹ Directive 95/46/EC (General Data Protection Regulation)

4.0 Completion of the remote survey/audit/verification



5.0 General comments

The mentioned lists of consideration are not exhaustive lists – there may be additional factors to take into account depending on vessel/company and/or type of survey/audit/verification.

Assessment of general performance shall include PCS performance, type, age and the RO file of the vessel/company.

6.0 Annual reporting

The RO/RSO shall report the total number of remote surveys/audits carried out via the annual reporting scheme on vessels flying the Danish flag (See DMA RO circ. 015).