

# Guidelines on **Remote Surveys/Audits/Inspections**

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**IRCLASS**  
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**Contents**

<b>Section</b>	<b>Page No.</b>
<b>1. Background.....</b>	<b>2</b>
<b>2. Information and communication technology used.....</b>	<b>3</b>
<b>3. Application &amp; Methodology.....</b>	<b>4</b>
<b>4. Review of request and planning remote survey/audit/inspection.....</b>	<b>5</b>
<b>5. Conduct of remote survey/audit/inspection.....</b>	<b>7</b>
<b>6. Use of electronic certificate.....</b>	<b>8</b>
<b>7. Qualification and authorization of surveyor/auditor/inspector.....</b>	<b>8</b>
<b>8. Guidance pertaining to specific surveys</b>	
<b>a. Occasional in-water survey.....</b>	<b>8</b>
<b>b. Examination/verification of repairs to hull structure and fitting/         machinery/equipment, extension/deletion of Condition of Class and         Statutory Conditions on review of each case .....</b>	<b>9</b>
<b>c. Extension of CSM items.....</b>	<b>9</b>
<b>d. Extension of tail shaft survey.....</b>	<b>10</b>
<b>e. Radio survey utilizing services of radio technician.....</b>	<b>11</b>
<b>f. Interim SMC/ISPS audit and Interim MLC inspection.....</b>	<b>11</b>
<b>g. ISM, ISPS and MLC – rectification of non-conformities or remarks.....</b>	<b>14</b>

## **1. Background**

- 1.1 Safety of life at sea, safety of assets and prevention of pollution are key factors for the shipping industry and their exposure to risk is an aspect which is duly considered during ship surveys/ audits/ inspections.
- 1.2 Recent developments in the methods for remote inspections coupled with the advances in the area of information and communications technology and the difficulties faced for attendance on board due to the pandemic situation have led to the increased application of remote surveys/ audits/ inspections by Classification Societies.
- 1.3 The purpose of this document is to provide guidelines to Owners/ Ship Operators and Surveyors for planning and undertaking remote survey/audit/inspection in an efficient and secure manner, as an alternative to survey/audit/inspection by attendance on-site.
- 1.4 Remote survey/ audit/ inspection is a partial or full verification undertaken for obtaining information equivalent to that obtained from survey/ audit/ inspection on-site, by applying digital and technological means, in an efficient and secure manner, without physical attendance of the surveyor/ auditor/ inspector onboard the ship or at site.
- 1.5 The consideration to undertake remote surveys is based upon its suitability and also aims to:
  - a) Maintain applicable safety standards.
  - b) Keep vessels operating despite restrictions on the movement of surveyors and assist meeting the demands of industry stakeholders.
  - c) Minimise disruption during cargo operations.
  - d) Optimize travel time and expenses.
- 1.6 Remote inspection techniques (RIT) may be utilised as required which enable visual examination of any part of the structure without the need for direct physical access of the Surveyor. RIT includes the use of remote techniques such as viewing audio and video or data stream, reviewing information and data by means of iPods, video conference/meetings, visual images, photographs, screenshots, print outs or using divers, climbers, drones and remotely operated vehicles to provide the results necessary.
- 1.7 Remote survey/ audit/ inspection may be requested to be undertaken due to unforeseen inability of IRS to attend the vessel or when access to the vessel is challenged due to conditions or Force Majeure conditions (as defined in IRS Rules).
- 1.8 For remote survey/audit/inspection using Information and Communication Technology (ICT) IRS has investigated and examined the types of survey to which it can be applied, determined the type and amount of information required for the remote survey/audit/inspection and the requirements for ICT to be used, thereby ensuring reliability equivalent to conventional physical survey/audit/inspection being achieved with

transparency in the application of remote survey/audit/inspection. It is recognized that remote survey/audit/inspection may be appropriate in some, but not all, circumstances and there are challenges and benefits involved. Presently occasional survey / audit/ inspection, as listed in Section 3.1 of these Guidelines are envisaged to being undertaken by remote means. When it is related to statutory matters, remote survey/ audit/ inspection will be subject to approval by the relevant Flag Administration.

- 1.9 IRS is proceeding in parallel in respect of amendment of related Rules and Regulations for the Construction and Classification of Steel Ships. The relevant Rules and Survey Procedures including guidance for Occasional survey which are normally surveyed under the attendance of Surveyor are being revised so that remote survey can be approved when the Society recognizes that information necessary for inspection can be obtained by using ICT.
- 1.10 Review of request for remote survey/audit/inspection will be carried out by IRS to ensure that there is no breach of International Conventions or legal, regulatory and statutory requirements of the relevant flag Administrations. Further planning for remote survey/audit/inspection would consider technology being used, internet connectivity and awareness of ship-board personnel regarding the requirements which can have an impact on the quality of remote survey/ audit/ inspection.
- 1.11 It is hoped that these guidelines will contribute to the conduct of more rational Surveys/Audits/Inspection of ships. These Guidelines will be reviewed as necessary based on advances in technology being used, experience gained during such survey/ audit inspection and inputs/ feedback from stake holders. Related rules for the survey of ships will be revised accordingly, in due course.

## **2. Information and Communication Technology used:**

- 2.1 A software application has been licensed by IRS to be used for remote survey/audit/inspection. The software application will be made available for downloading by ship onto on-board hardware such as Android/iOS Smartphones/ tablet, laptop computers, desktop computers so as to connect to the computer preloaded with the software application located at IRS Head Office for use by the surveyors.
- 2.2 The application also allows for offline recordings of onboard activities in areas where there is no internet (photos & videos) and same can be synced into backend dashboard once the device enters area with internet. Further, the application also allows the surveyor to connect with any expert at either Survey Station or Head Office through a live video/audio call.
- 2.3 Surveyor/auditor/inspector undertaking remote surveys will be familiarized in the application of Software. Guidelines for use of the application software have been prepared and will be provided to the surveyors and shipboard personnel.

### 3. Application & Methodology

3.1 The following surveys/ audits/ inspections can be considered for being undertaken remotely:

- (i) Occasional In-water Survey
- (ii) Examination/verification of repairs to hull structure and fittings/machinery/equipment, extension/deletion of Condition of Class and Statutory Conditions on review of each case (excluding inspection required on the recommendation of PSC/FSI)
- (iii) Extension of continuous survey of machinery items
- (iv) Extension of Tailshaft Survey for a maximum period of 1 year
- (v) Radio surveys utilizing services of IRS approved Radio Firm
- (vi) Interim ISM/ISPS Audit and interim MLC inspection
- (vii) ISM, ISPS and MLC rectification of Non-Conformities or remarks (not applicable in case of additional audit due to PSC and FSI inspections)

Flag concurrence will be obtained for survey/audit/inspection related to statutory requirements also.

3.2 Methodology for remote survey/audit/inspection:

3.2.1 Detailed methodology for remote survey/ audit/ inspection will depend on the type of survey/audit/inspection being undertaken. While information required such as videography/photographs and supporting documents would be exchanged through email. arrangement for two-way communication is to be confirmed for all cases.

3.2.2 In addition, video calling/ livestreaming should be available as follows:

Type of remote survey/audit/inspection	Video calling / livestreaming
In-water survey and verification of repairs to hull structure and fittings/machinery/equipment	High resolution
Extension of tail shaft survey, extension of CSM items, radio survey and interim ISM/ISPS/MLC audits	Low resolution
Specific cases for extension of CSM items and minor repairs based on evaluation of the case where it is possible to confirm required information and rectification of ISM/ISPS/MLC non-conformities	Not necessary

3.2.3 In general, most of the surveys/audits/inspection listed in Section 3.1 will be undertaken using remote software application in real time. However extension of CSM items, minor repairs may be accepted based on review of videography/photographs and supporting documents on a case by case basis where it is possible to confirm required information without real time communication.

3.2.4 For the purpose of these guidelines, remote surveys/ audits/ inspections are those that use information and communication technology for collection of data and survey process, instead of surveyor attendance at site. The data is collected over the internet by using a computer, smartphone or tablet so the surveyor/auditor at a remote location can communicate with the ship/site. A remote survey may or may not use RIT, as shown below:

Type of Survey/Audit	RIT	ICT
By attendance at site (normal)	Not used	Not used
	Used	Not used
Remote	Not used	Used
	Used	Used

3.2.5 Photographic and filmed data captured during survey/audit/inspection is to be archived for future reference.

3.2.6 Security of data: Data security policies and procedures are to be in place to verify that the data collected during the survey/audit/inspection are captured, transmitted, and stored in a secure way that has minimum vulnerability to unauthorized manipulation and distribution. Integrity of the raw data is to be maintained during the data storage process. The data is to be made available as and when required via secure sharing mechanisms to authorized personnel and systems.

#### **4. Review of request and planning remote survey/ audit/ inspection**

4.1 In all cases of request for survey/ audit/ inspection to be undertaken remotely, Survey request form - SRF (Remote Survey), is to be filled up by the ship or the Company. The request would be reviewed at Head Office, keeping in mind the risk-based approach required by ISO 9001:2015.

Request for remote statutory survey/ audit/ inspection would be forwarded to the Flag Administration for their acceptance.

It is to be ensured by the surveyor/ auditor/ inspector that specific instruction from IRS Head Office including Flag Administration, if any, are taken into account for the conduct of the remote survey/ audit/ inspection.

4.2 Before initiating the survey/audit/inspection, the following are to be confirmed by the surveyor/auditor/inspector undertaking the survey/ audit/ inspection:

- i. scope of survey/ audit/ inspection requested.
- ii. schedule for the planned survey/ audit/ inspection.
- iii. time frame for conducting the survey/ audit/ inspection.
- iv. the list of activities, areas, information and personnel to be involved.
- v. the list of items to be examined, operational tests/ checks to be carried out and sharing of such information and the relevant survey checklists with the ship in advance.
- vi. list of records and documentation required by the surveyor/auditor/inspector in advance, as well as during the survey/audit/inspection.

4.3 Following would be requested from the ship (as considered necessary) by the surveyor/ auditor/ inspector through email communication:

- i. Relevant records and documentation based on the requested survey/ audit/ inspection.
- ii. Proposal for reviewing information that cannot be shared remotely (i.e. due to confidentiality or access issues).
- iii. Filled in checklist for the concerned survey, audit or inspection with findings and declaration by Master/ Chief Engineer regarding condition of the vessel, its machinery and equipment based upon the examination held by them. .
- iv. Videography/ photographs of the ship and its equipment
- v. Known deficiencies with photographs, proposal for repairs, alternate arrangement and documents supporting proposals.
- vi. Other evidence as deemed essential and necessary by the surveyor/ auditor/ inspector
- vii. Details of person/s involved during remote survey/ audit/ inspection on ship.
- viii. Confirmation of having received the instructions towards conduct of remote survey/ audit/ inspection (standing instructions and any specific instructions if required and considered necessary by surveyor/ auditor/ inspector).
- ix. Mitigation measures based on risk assessment which may be required for undertaking remote survey/ audit/ inspection.

4.4 Surveyor/ Auditor/ Inspector will review the supporting documents and videography/photographs provided by the Master / Chief Engineer prior to undertaking the remote survey/ audit/ inspection, to arrive at specific areas requiring focus during the survey/ audit/ inspection.

4.5 Surveyor/ Auditor/ Inspector is to ensure that the remote software application is satisfactorily installed on ship's equipment and conduct a trial to ensure the scheduled survey/audit or inspection will perform as planned. He/ she will further confirm that the responsible person is conversant with the use of software application, the platform and requirements of remote survey/audit/inspection. Real time communication channels other

than software application platform between the ship and the surveyor/ audit/ inspector is to be checked and confirmed.

- 4.6 As the purpose of the survey/ audit/ inspection is to verify that the ship is in compliance with IRS Rules and statutory Conventions, it is essential that Master, Chief Engineer and other personnel involved in remote survey/ audit/ inspection cooperate and provide information in a transparent manner so that deficiencies/ non-compliances are brought out, in the interest of the safety of the vessel, crew and protection of the environment.

## **5. Conduct of Remote Surveys/ audits/ inspections:**

- 5.1 A planning/opening meeting is to be scheduled to brief the Master, Chief Engineer, responsible persons on ship including service suppliers, (if required) during remote survey, in respect of the scope of survey/ audit/ inspection, how the activities will be progressed, items and tests which will be witnessed and to confirm the arrangements.
- 5.2 Date / time shown on the device having the application software installed is to be verified for correctness, as this would be reflected in the remote survey/ audit/ inspection records.
- 5.3 It is recommended to take photographs which includes ship particulars such as ship name, IMO No., marking in engine room, name plate on machinery/ equipment, AIS static data etc.
- 5.4 It is essential that sufficient lighting is arranged by the ship to show the condition of the ship, its machinery and equipment clearly. . Where the survey location does not have sufficient /no natural lighting, temporary lighting is required to be provided, keeping safety issues on priority at all times.
- 5.5 Surveyor/ auditor/ inspector is to ensure the specific job card and instructions are provided to the ship board personnel for each session.
- 5.6 Remote survey/ audit/ inspection is to be undertaken by checking items to get information as normally obtained from a physical survey/audit/inspection based on IRS survey procedures/work instructions.
- 5.7 If the surveyor/ auditor/ inspector is not satisfied with the arrangements or if the remote session cannot be properly maintained, he/ she may call off the survey/ audit/ inspection. For example in case of a live video, the image quality is to be at least such that the person or the thing can be clearly seen.
- 5.8 All findings are to be recorded and proposal for repairs, corrective actions are to be reviewed along with provisions for alternate arrangements. For deferment of repairs to statutory items, Flag advice would be sought.



## **6. Use of Electronic Certificate**

- 6.1 Electronic certificate will be issued or endorsement done electronically, as appropriate, where any class or statutory certificate is required to be issued to the ship or endorsed upon successful completion of the remote survey/audit/inspection. E-certificate issued will be in compliance with the IMO FAL.5/Circ.39 & flag administration guidelines. It will be ensured that acceptance by Flag State exists to issue electronic certificate.

## **7. Qualification and authorization of Surveyor/Auditor/Inspector**

- 7.1 Surveyors/ Auditors/ Inspectors who are qualified for the surveys/ audits /inspections to be undertaken remotely listed in these guidelines are familiarized in the use of the software application and the platform including the procedure for undertaking remote survey/audit/inspection. Record of surveyor/auditors/inspectors authorized to undertake remote surveys is being maintained by IRS.

## **8. Guidance pertaining to specific surveys:**

### **a. Occasional In-water Survey:**

Occasional In-water survey may be carried out remotely to examine damage to underwater portion of hull, appendages or shafting system or any other suspected damage. Extension of docking survey based on In-water survey undertaken remotely are subject to concurrence of the flag Administration and declaration from Chief Engineer that the vessel is free of any underwater damage subsequent to last drydocking, no undue vibration and no stern tube oil leakage.

The inspection plan for the use of remote operated vehicle if used, will be reviewed and agreed prior to commencement of the survey.

Underwater examination will be carried out using the services of an approved diving company which is witnessed remotely by the surveyor. Surveyor will communicate with the supervisor of the diving company at site who in turn guides the diver underwater. In case of remote operated vehicle, surveyor will directly communicate with the operator. Master and/or Chief Engineer of the vessel will also witness the underwater examination and countersign the report prepared by the diving company prior sending same to surveyor. Video recording of in-water survey is also sent to the surveyor electronically.

Findings and proposal from the Owners (as relevant) are shared with Flag Administration. Conditions imposed are to be agreed with the Flag Administration and reflected in relevant statutory certificates & Class survey status.

**b. Examination/verification of repairs to hull structure and fitting/machinery/equipment, extension/deletion of Condition of Class and Statutory Conditions on review of each case:**

Remote survey for verification of repairs to hull structure/machinery/equipment, extension/deletion of condition of class (COC) and statutory recommendation may be considered subject to review of the specific case based on the extent, nature of deficiency, structure/machinery/equipment involved and repairs proposed.

For request related to deferment of repairs to items which impact statutory certificate/s, extension/deletion of statutory condition/s. Flag Administration will be consulted and advice obtained.

Extension of condition of class and statutory conditions are based on examination and confirmation that the temporary repairs and/or alternative arrangements are effective and considered to remain efficient for the proposed period of extension requested.

For proposal for deletion of condition of class/statutory condition, supporting documents are required to be submitted to surveyor for consideration such as manufacturer's recommendation, approval of works involved, approval details of material/component used, qualification of personnel/service supplier, work done report as applicable. The repair procedures are to be approved by the surveyor.

The stage verifications and tests are witnessed remotely by the surveyor based on the approved repair procedure. High resolution camera will be required to carry out examination of certain repairs at the discretion of the surveyor. Stage verifications including witnessing of test are also done parallelly by the Chief Engineer/Master. A report of repairs undertaken including the tests done satisfactorily is received from the ship duly signed by the manufacturer/service supplier/works undertaking the repair and countersigned by the Chief Engineer/Master.

Based on satisfactory remote survey, surveyor may recommend a fresh COC/Statutory condition and/or recommend for extension/deletion of existing COC/ statutory condition as applicable. Where considered necessary, Surveyor may recommend for a confirmatory survey to be undertaken subsequently by a definite time. Necessary condition is included in the survey status/statutory certificate as applicable.

**c. Extension of CSM items:**

Ship will be requested to provide supporting documents pertaining to planned maintenance undertaken, record of operating parameters including running hours since last maintenance, megger test report as applicable including confirmation from Chief Engineer that machinery is operating in satisfactory condition.

Based on review of above, examination of the machinery will be undertaken remotely along with trial of machinery as required by the surveyor. In case the running trial is not found satisfactory or the operating parameters beyond normal range, a complete examination of the machinery item will be required and a condition of class will be recommended to this effect if existing condition is considered to remain efficient meantime.

**d. Extension of tail shaft survey:**

Request for proposal for extension of tail shaft survey for a maximum period not exceeding one year by remote survey can be considered subject to Flag concurrence and satisfactory examination as detailed below. Towards such a proposal, Chief Engineer is required to confirm on following and provide a declaration:

- a. that the propeller is free of damage and there are no undue vibrations
- b. no abnormal leakage from the shafting system
- c. no under water repairs have been done to shaft and/or propeller since last examination in dry dock.
- d. the shafting arrangement is in good working condition

Following documents which are to be kept as records are to be submitted by Chief Engineer for review:

- a. Review of previous wear down and/or clearance recordings.
- b. Review of service records.
- c. Review of test records of lubricating oil analysis and oil sample examination.
- d. Review of stern tube lube oil consumption for last one year.
- e. Review of stern tube bearing temperature records, if applicable.

Subject to satisfactory verification of the submitted documents, surveyor undertakes the remote survey based on scope as per IRS survey procedure towards extension of tail shaft survey.

The following will be undertaken remotely:

- a. Visual Inspection of all accessible parts of the shafting system in the machinery space.
- b. Verification that propeller is free of damage which may cause propeller to be out of balance.
- c. Verification of any leakage from the shafting system to prove effectiveness of seal.
- d. Verification of any water contamination by opening drain provided in stern tube lube oil system.

Based on satisfactory survey, the tail shaft survey may be extended for the requested period not exceeding one year.

**e. Radio Survey utilizing services of radio technician**

Radio survey can be undertaken remotely utilizing the services of IRS approved Radio Firm, only after agreement with the Flag Administration.

Necessary checklist/forms/formats for survey are to be provided to the radio technician of the Radio Firm through electronic means. Radio technician is required to attend the opening meeting for remote survey where he will be provided with specific instruction by the surveyor regarding the survey, compliance to new requirement and dealing with finding if any.

The examination and test of GMDSS equipment undertaken by radio technician will also be witnessed by the surveyor remotely while these are also witnessed on board by an officer holding GOC. (Certificate of GOC holder to be forwarded to remote surveyor)

On completion of examination and test of GMDSS equipment on board, radio technician is to fill up and send the reports to the surveyor duly endorsed by GOC holder on board who witnessed the examination and test of GMDSS equipment along with supporting documents and test reports for radio equipment, as required by the surveyor.

Surveyor will review the GMDSS report and supporting documents and on satisfactory review, endorse the report and issues fresh electronic certificate in case of renewal survey or endorses the electronic certificate previously issued to the ship in respect of periodical survey held now, as the case may be.

**f. Interim SMC/ISPS Audit and interim MLC inspection**

Request for remote audit/inspection will be processed in consultation with Flag Administration.

Opening meeting is to be conducted in presence of at least the standby key personnel of the auditee and the audit team. Review of documents is carried out by sharing resources over the agreed platform or by review of electronic documents submitted by email. Required verification / checks, crew interviews, general examination is carried out by use of licensed software application Assist. Job cards are prepared for recording activities to be included in a session.

While the audit/inspection is to check processes and specific items as per scope based on the assessment checklist and requirements of IRS work instruction and Flag specific requirements, the following is provided for general guidance:

**(aa) Interim SMC Audit:**

Following are to be verified by the auditor:

- i. Copy of DOC / Interim DOC, for the relevant ship type is available on board, is valid and has annual endorsements (if applicable).
- ii. Vessel has valid Class and statutory certificates and no surveys, CoCs or statutory notes are overdue.
- iii. Mandatory documents required to be carried by the ship are available on board including specific documents required by the Flag Administration.
- iv. The ship is manned as per requirements of minimum safe manning documents, by verification of latest crew list and crew certification.
- v. Interim SMC audit assessment checklist is used to verify the relevant items through software application platform. Remote examination of emergency devices, life saving appliances, including life boat and rescue boat, emergency generator and emergency fire pump should be undertaken on sampling basis.
- vi. A statement is received from the Master confirming that the safety management system is in place and meets the requirements of paragraph 14.4 of the ISM Code.

**(bb) Interim ISPS Audit:**

Following are to be verified by the Auditor:

- i. SSA has been carried out by the Company.
- ii. SSP has been submitted to RSO for approval and a copy of draft SSP is available on board.
- iii. Continuous Synopsis Record is maintained.
- iv. SSAS and security equipment specified in SSP are operational and fit for the intended service.
- v. The ship is manned as per requirements of minimum safe manning documents, by verification of latest crew list and crew certification.
- vi. Mandatory documents required to be carried by the ship are available on board including specific documents required by the Flag Administration.
- vii. Interim ISPS audit checklist will be used to verify the relevant items remotely through software application platform.
- viii. A statement is received from the Master confirming that the security system is in place and meets the requirements of paragraph 19.4.2 of Part A of the ISPS Code.

**(cc) Interim MLC Inspection:**

Following are to be verified by the Inspector:

- a) DMLC Part I and draft DMLC Part II are available on board and DMLC II has been submitted to RO for approval.
- b) Financial security documents required as per Regulations 2.5.2 and 4.2 of MLC are available on board.
- c) Mandatory documents required to be carried by the ship are available on board including specific documents required by the Flag Administration.
- d) The ship is manned as per requirements of minimum safe manning documents, by verification of latest crew list and crew certification.
- e) Interim MLC inspection check list will be used to verify the relevant items remotely through software application platform.
- (f) A statement is received from the Master confirming that:
  - i. The air conditioning in accommodation spaces is working in order.
  - ii. The stocks of food, provisions and drinking water are in sufficient quantity on board.
  - iii. The Seafarer employment agreements of seafarers on board are valid / extended as per instructions of flag administration and with the consent of seafarer.
  - iv. The medical certificates of seafarers on board are valid / extended as per instructions of flag administration.
  - v. There are no pending records of on board complaints by seafarers.
  - vi. The procedures as stated in DMLC part II are implemented on board and the objectives of MLC convention are met.

**Audit Findings**

Findings (Non-conformances, Observations, etc.) are to be drafted by the remote audit team and passed on to the auditee in a timely manner for each session for review and acknowledgement.

The findings are to be posted in writing and the auditee is encouraged to provide additional information to be included in the text.

**Post Audit/inspection Activities and reporting:**

Communication between the auditor and the auditee for sending documents or clarification on issues and corrective action management are to be pre-defined and communicated.

The auditor is to delete any confidential documents, images, recordings, etc. after the audit.

The non-conformities, issuance / endorsement of certificate, reporting of audit, are to be dealt in the same way as in case of a physical audit.

**Summary of Recommendations for Audits/Inspections:**

In the summary of recommendations, following text, modified as appropriate, are to be included by the Auditor/ inspector:

“[Audit/Inspection] carried out remotely, with the use of electronic technology for exchange of documents, discussions, interviews, etc. and as authorized by the Flag Administration vide their email dated dd/mm/yyyy (alternatively vide their Circular No. ....).”

The above text is in addition to recommendations in case of an audit by attendance on board.

**g. ISM, ISPS and MLC – rectification of non-conformities or remarks**

Rectification of non-conformities or remarks recorded during ISM, ISPS and MLC audit/inspection will be carried out electronically through IRS website and in accordance with relevant IRS Work Instruction Manual.

Corrective action plan is to be received from the ship / company and agreed by the auditor, in accordance with the procedures described in the relevant Work Instruction Manual.

Duly completed non-conformity report, which includes actions to restore compliance, its root cause and actions to prevent recurrence, along with supporting documentary evidences, is to be received from the company electronically.

Upon satisfactory review of non-conformity report by the lead auditor or any other qualified auditor, the non-conformity is to be resolved with endorsement electronically and suitable comments, as appropriate. Example of such comments are “effectiveness to be verified during next scheduled audit”.

The above procedure for rectification of non-conformities is applicable only to non-conformities that are not major non-conformities.

**References :**

- Panama MMC – 382 - Panama Policy on Remote Surveys for Recognized Organizations and Recognized Security Organizations
- IACS Recommendation 42 - Guidelines for Use of Remote Inspection Techniques for surveys
- ISO 9001:2015

**End of the Guidelines**