



POOLE HARBOUR COMMISSIONERS

POOLE HARBOUR COMMISSIONERS PORT MARINE SAFETY CODE AUDIT

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Poole Harbour Commissioners Port Marine Safety Code Audit

Prepared for: Poole Harbour Commissioners
20 New Quay Road
Hamworthy
Poole
Dorset
BH15 4AF

Author(s): David Foster / Paul Fuller

Checked By: Dr Ed Rogers

Marine and Risk Consultants Ltd
MARICO Marine
Bramshaw
Lyndhurst
SO43 7JB
HAMPSHIRE
United Kingdom

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Contents

INTRODUCTION	1
1 THE LEGAL BACKGROUND	2
1.1 COMMENTS	3
2 ACCOUNTABILITY OF DUTY HOLDER	4
2.1 COMMENTS	5
3 CONSULTATION AND COMMUNICATION	6
3.1 COMMENTS	7
4 RISK ASSESSMENT AND SAFETY MANAGEMENT SYSTEM	8
4.1 COMMENTS	9
5 EMERGENCY PREPAREDNESS AND RESPONSE	11
5.1 COMMENTS	11
6 CONSERVANCY	12
6.1 COMMENTS	12
7 MANAGEMENT OF NAVIGATION	13
7.1 COMMENTS	14
8 PILOTAGE	15
8.1 COMMENTS	16
9 TOWAGE	17
9.1 COMMENTS	18
10 MARINE SERVICES	19
10.1 COMMENTS	20
11 PROFESSIONAL QUALIFICATIONS AND COMPETENCIES	21
11.1 COMMENTS	21
12 ACCIDENT INVESTIGATION AND ENFORCEMENT	22
12.1 COMMENTS	23

EXECUTIVE SUMMARY

Poole Harbour Commissioners (PHC) appointed Marine and Risk Consultants Ltd (MARICO Marine) to conduct a Port Marine Safety Code (Oct 2009 Rev.) compliance check audit. The audit was carried out on 4th & 5th May 2011 following a desk based review of documentation provided by PHC Harbour Master, Captain Brian Murphy and PHC Assistant Harbour Master, Captain Richard Dixon.

Overall PHC complies satisfactorily with the Port Marine Safety Code and has adequate systems in place.

A number of observations were noted, the most significant are:

- Continue with applying pressure to expedite the approval of the HRO and revised byelaws;
- Review the appointment of the ‘Designated Person’; and
- Consolidate the Navigation Risk Assessment into one system including a more comprehensive list of mitigation measures;

Consideration should be given to;

- Adding a scale of “penalties” to the PHA Enforcement policy;
- Promulgating all harbour related stakeholder group meeting minutes on PHC website;
- Conducting a full navigational risk assessment of the operation of the new marina prior to its opening to identify any possible mitigation measures that may be required;
- Introducing a more formal procedure for monitoring the competence and performance for PHC and sub-contracted pilots;
- Introducing a formal cross training / familiarisation programme for pilots and tug skippers ; and
- Introducing a regular inspection routine and the formal recording of navigation aids.

The full details of these observations plus others can be found in the twelve tables of this report, each of which has expanded comments at the end of each section.

INTRODUCTION

PHC appointed Marico Marine and Risk Consultants Ltd (Marico Marine) to conduct a Port Marine Safety Code (Oct 2009) compliance check audit in May 2011.

D Foster and P Fuller jointly reviewed documentation provided by PHC prior to conducting a visit to the port to carry out the Port Marine Safety Code check audit on 4th and 5th May 2011.

As part of the audit review, meetings were held with;

- Captain Brian Murphy - Harbour Master;
- Captain Richard Dixon - Assistant Harbour Master, and
- Ian Cookson - VTS co-ordinator.

A two hour harbour familiarisation tour aboard the pilot launch was also undertaken.

A wash up meeting was held immediately after the audit attended by:

- Mr R Lacey – Chairman of PHC;
- Mr J Stewart – Chief Executive and ‘Designated Person’ PHC;
- Captain B Murphy – Harbour Master;
- Mr D Foster – Marico Marine and
- Mr P Fuller- Marico Marine.

The audit was carried out using a check list that was derived from the Port Marine Safety Code (Oct 2009) (PMSC) and the associated A Guide to Good Practice on Port Marine Operations (Oct 2009) (GtGP).

The twelve sections of this report follow the chapter headings used in the “A Guide to Good Practice on Port Marine Operations” with cross references to paragraphs in both the PMSC and GtGP. At the end of each section there are some additional observations and recommendations.

1 THE LEGAL BACKGROUND

1	GtGP	PMSC		Y/N	Comment
.1	1.1	1.1 5.1- 5.31	Is the legislation applicable to the harbour authority known and listed?	Y	
.2	1.2	1.2 4.9	Are the statutory duties and powers of the harbour effective for purpose?	N	PHC have applied for a HRO and revision of their byelaws.
.3	1.3 1.15	5.1	Are specific duties and powers in use?	Y	
.4	1.4	4.11 4.12	Does the harbour have Byelaws?	Y	Outdated – PHC have applied for a revision of their byelaws.
.5	1.5 See also 1.12	5.1 – 5.31	Is legislation reviewed regularly to determine if it adequately covers risks identified?	Y	See above.
.6	1.6 1.7	1.2	Are local duties and powers understood?	Y	
.7	1.8 1.9	1.2 5.3 – 5.4	Does the harbour authority have powers of Special Directions?	Y	
.8	1.10 1.11	5,5	Does the harbour authority have powers of General Direction?	N	PHC have applied for the powers of General Direction.
.9	1.12 – 1.18	4.9 4.10	Are there grounds for applying for a Harbour Revision Order?	Y	See above.
.10	1.19		Does the harbour authority issue licences?	Y	Mooring Licence. Works Licence.
.11	1.20	3.18	Is an effective enforcement policy in existence in the harbour authority?	Y	PHC may wish to formalise the enforcement scale.
.12	1.4 1.5	3.4 4.8	Are the harbour limits of jurisdiction appropriate to the current activity of the port?	Y	

1.1 COMMENTS

The Act and Byelaws appertaining to the management of Poole Harbour are outdated and no longer fully fit for purpose. PHC have applied for a Harbour Revision Order and a revision of their Byelaws in order to update, clarify and consolidate the local legislation plus gain additional powers (e.g. General Directions). Despite chivvying by PHC both the HRO and Byelaw revision are held up in the national consent process.

1.11 Consider adding a scale of “penalties” to the PHA’s Enforcement Policy e.g.:

- HM’s verbal warning.
- HM’s written warning; and
- Prosecution.

2 ACCOUNTABILITY OF DUTY HOLDER

2	GtGP	PMSC		Y/N	Comment
.1	2.1A	2.1 2.3 2.4	Is the Duty Holder defined and published?	Y	
.2	2.1B 2.2.1 – 2.2.11	2.1	Are policies, statements of compliance or similar published?	Y/N	Some are published on the PHC website.
.3	2.1C	2.1 2.10	Is the Chief Executive responsible for safety operations and staff?	Y	
.4	2.2.19	2.3 – 2.7	Do members of the board or equivalent understand the responsibilities of the “Duty Holder”?	Y	Each new Commissioner is fully briefed when they join the board.
.5	2.2.20	2.6 2.11 2.12	Has a Harbour Master been appointed?	Y	
.6	2.1E 2,2,25 – 2.2.30	2.8 2.9	Has a Designated Person (DP) been appointed?	Y	The CEO.
.7	2.1E 2.2.28 – 2.2.30	2.8 2.9	Does the DP have sufficient independence?	N	See below.
.8	2.2.25	2.8	Does the DP have direct access to the Duty Holder?	Y	At board meetings.
.9	2.2.25	3.17	Has the DP reported to the Duty Holder?	Y	At board meetings.
.10	2.1B 2.2 2.2.34 2.2.35	3.22	Has a report of formal review been published within the last three years?	Y	Annual Report on website.

.11	2.1	2.1	Has the harbour authority published a commitment to comply with standards laid down in the PMSC?	Y	In Policy section on website.
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2.1 COMMENTS

2.4 The Harbour Commissioners are made fully aware of their collective responsibilities as “Duty Holder” as set out in the PMSC.

2.6 At present the CEO is the “Designated Person”. PHC acknowledge that this is not a fully satisfactory arrangement as it could be construed as not providing sufficiently independent or transparent monitoring of the SMS system or the port operation. PHC are actively investigating alternative arrangements.

3 CONSULTATION AND COMMUNICATION

3	GtGP	PMSC		Y/N	Comment
.1	3.2.2 - 3.2.5	3.12	Does the harbour have any outstanding consultations for statutory procedures (HRO or Byelaw updates)?	Y	The new lifting bridge byelaw is in the final stage of consultation.
.2	3.2.6	5.5 5.20	Have users been consulted on any new General or Pilotage Directions?	Y	
.3	3.2.8	3.5 – 3.7 4.1.8 4.1.9	Have users been consulted on existing or new risk assessments?	Y	
.4	3.2.10 3.2.11	3.12	Are there any Users' Committees?	Y	Numerous biannual meetings with individual stakeholder groups plus and annual public open meeting.
.5	3.2.12	3.19	Are plans, reports, information and/or advice affected by or affecting harbour users communicated effectively to them?	Y	Yes via the above meetings and some are also placed on the PHC website.
.6	3.2.13	5.26	Is a communication regularly maintained with the General Lighthouse Authority?	Y	PANAR and two inspections per year
.7	3.3	3.12	Does a communication channel exist to and from all those involved in or affected by the Safety Management System?	Y	

.8	3.3.1 2.2.31	3.9	Are procedures documented in, or appended to a Safety Management System?	Y	
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3.1 COMMENTS

PHC makes a considerable effort to communicate with its numerous stakeholder groups and maintain records of actions and decisions.

Regular meetings are held with:

- Boatyard and Mooring Contractors;
- Harbour Safety;
- Passenger Boat Operators;
- Poole Harbour Steering Group;
- Tenant Liaison Meeting;
- Poole Yachting Association;
- Poole and District Fisherman's Association
- IFCA
- Chartered Skippers; and
- Poole Harbour Watch.

3.4 Consider placing the minutes of the stakeholder meetings on the PHC website.

4 RISK ASSESSMENT AND SAFETY MANAGEMENT SYSTEM

4	GtGP	PMSC		Y/N	Comment
.1	4.1.1	3.5 – 3.7	Has a Formal Risk Assessment been carried out for the port/harbour?	Y	Two different systems in place.
.2	4.1.6 4.2.4 4.2.10	3.5	Does the risk assessment address marine hazards effectively?	Y	Logical approach.
.3	4.2.9	3.6	Has the risk assessments been carried out by suitably qualified people?	Y	
.4	4.1.7	3.7	Is the risk assessment regularly reviewed?	Y	Routinely and as part of the post incident investigation process.
.5	4.1.7 4.2.5	3.7	Does the risk assessment process allow for special circumstances (e.g. an unusual operation) that require more focused attention?	Y Y	Major events and regattas. New Marina – See below.
.6	4.1.7 4.2.6	3.7	Is any review process of the risk assessment inclusive of input from accident/incident investigations either internal or external (e.g. MAIB)?	Y	A good closed loop feeds back into the NRA and SMS system.
.7	4.1.8 3.2.9	3.7 3.2.8 3.2.9	Are risk assessments available to those they affect?	Y/N	Not immediately to those outside PHC. Harbour users affected by risk assessments are consulted during the review process.
.8	4.2.1 4.3	3.7	Does the risk assessment process include requirement and guidelines for dynamic risk assessment?	Y	Safety briefings and tool box talks etc.

.9	4.4	3.8	Is there a documented Safety Management System (SMS)?	Y	A well documented and laid out system set up in a dedicated office space.
.10	4.4.2 4.4.3	3.8	Does the SMS include reference to relevant national and local legislation?	Y	
.11	4.4.2 4.4.4	3.8 3.9	Does the SMS include statements of Policy?	Y	
.13	4.4.2 4.4.6 4.4.7	3.8 3.9	Does the SMS contain or refer to procedures to cover the major aspects of marine safety within the port?	Y	Clearly set out.
.14	4.4.2 4.4.8	3.8 3.9 3.10 3.17	Does the SMS contain a procedure for measuring performance?	Y	Monthly and annually. Trends are identified.
.15	4.4.2 4.4.9 4.4.10	3.8 3.9	Does the SMS include processes for effective (annual) internal audit, review of procedures and external audit?	Y	
.16	4.4.2 4.4.10	3.8 3.14 3.15	Does the SMS review process include risk assessment review (see 4.6 above) and are lessons learnt applied to relevant procedures?	Y	Being improved further.
.17	3.3 4.4.2		Is the SMS user friendly?	Y	Very well set out.

4.1 COMMENTS

4.1 to 4.4 PHC have conducted a formal Navigation Risk Assessment (NRA) of the navigational risks in the harbour. Over the years, two risk assessment systems have been developed and the majority of the risks and most of the mitigation measures have been identified. The current risk assessment is disjointed and work is in hand to consolidate the system, subdivide the

harbour into areas and create a more comprehensive list of the mitigation measures that are already in place.

4.5 PHC are developing a new marina in the vicinity of the old RoRo 1 berth in close proximity to the ferry terminal and commercial berths. PHC have conducted a navigational risk assessment of the new marina and will publish the results along with any additional mitigation measures considered necessary prior to its opening.

4.7 Consider placing the updated NRA onto the PHC website.

5 EMERGENCY PREPAREDNESS AND RESPONSE

5	GtGP	PMSC		Y/N	Comment
.1	5.1 5.1.1	3.9	Does the Port/Harbour have emergency plans?	Y	Part of the SMS.
.2	5.1.1	3.9	Are emergency plans included in or referred to in the SMS?	Y	Being revised post the recent PHC reorganisation.
.3	5.1	3.9	Is the harbour included in larger national or regional plans?	Y	Both local and County.
.4	5.1	3.9	Has the harbour been involved in or carried out its own exercises?	Y	Fully recorded exercise programme.
.5	5.2 5.3	5.7 5.10	Does the SMS address the handling of dangerous or polluting cargoes/ substances?	Y	Contained in the VST procedures. Fully documented.

5.1 COMMENTS

PHC have comprehensive and straight forward emergency procedures. The latest edition of POOLSPILL has recently been approved by the MCA.

Port fully complies with CERS reporting procedures. Electronic and manual records of dangerous goods entering port were reviewed and found to be satisfactory and in accordance with current legislation.

6 CONSERVANCY

6	GtGP	PMSC		Y/N	Comment
.1	6.1	4.3	Does the harbour authority fully understand its conservancy duties?	Y	
.2	6.1.2 6.2	4.3	Does the harbour authority carry out regular hydrographic surveys?	Y	The harbour is divided into sections that are surveyed at set frequencies.
.3	6.1.2 6.3 6.4	4.3 4.4	Does the harbour authority take action on, and promulgate the results of surveys?	Y	Tight system exists to ensure that the latest survey information is available to harbour users.
.4	6.5	5.27 5.29	Are aids to Navigation maintained by the Harbour authority?	Y	See below.
.5	6.6	5.30	Does the harbour authority have a defined policy on wreck removal and salvage?	Y	
.6	6.7		Does the SMS address the possibility of interaction between works/ development/ degeneration in or near the harbour and conservancy?	Y	Part of the Works Licence approval process.

6.1 COMMENTS

6.4 Consider introducing a formal inspection and recording routine of all navigational aids. Whilst it is understood that there is not a 24hr harbour patrol and the difficulties an inspection routine may present the harbour could for example be divided into four manageable areas. On a weekly basis navigation aids within each of those areas are checked and formally recorded thereby ensuring all navigation aids are formally checked and recorded at monthly intervals.

7 MANAGEMENT OF NAVIGATION

7	GtGP	PMSC		Y/N	Comment
.1	7.1 7.5.6	5.13 5.15	Does the harbour authority maintain any form of traffic monitoring?	Y	VTS – Information service only
.2	7.2	5.15	Does the risk assessment include aspects of management of navigation?	Y	Listed as mitigation measures.
.3	7.2 7.3	5.15	Have the needs for VTS or alternatives been assessed?	Y	Currently under review. See below.
.4	7.2	4.3 4.4	Have the conservancy provisions been assessed in relation to effective management of navigation?	Y	Recently introduced directional beacon at harbour entrance. In 2006 buoyage numbering changed to a more logical system.
.5	7.2.5	4.2	Have the needs of all harbour users been fully considered in management of navigation?	Y	Numerous stakeholder group meetings.
.7	8.3.2	5.18	Has the harbour authority identified the needs for pilotage?	Y	See Poole Pilotage Manual
.8	7.7		Does the Harbour authority operate harbour patrols?	Y	1 Apr to 30 Sept or 30 Oct. 1400-1800 weekdays and 1000-1900 weekends (later if required). Pilot boat available all year round when on duty

.9	7.8 7.9.		Does the harbour authority have to accommodate operations or events outside normal commercial activity?	Y	Includes; yacht racing, regattas, SBS and RM activities, firework displays etc.
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7.1 COMMENTS

7.3 VTS provision is currently under review as to whether to increase the level from an Information Service (INS) to a Traffic Organisation Service (TOS), reference MGN 401.

8 PILOTAGE

8	GtGP	PMSC		Y/N	Comment
.1	8.1	5.17 5.23	Does the harbour authority provide pilotage?	Y	Reference, Poole Pilotage Manual, SMS Book 3.
.2	8.3.14	5.20	Has the harbour authority issued pilotage directions?	Y	As above.
.3	8.3.1	5.18	Is the pilotage provision continuously updated through risk assessment?	Y	Continuously reviewed, last review Dec 2008 and amended June 2009.
.4	8.3.7	5.22	Does the harbour authority issue pilotage exemption certificates?	Y	Approx. 15 x PEC certificates currently issued.
.5	8.3.34	5.23	Is there a formal training scheme for pilots?	Y	See Pilotage Manual Chapter 2.
.7	8.3.34	5.23	Does the harbour authority regularly monitor the competence and fitness of Pilots and PECs?	Y	See below.
.8	8.3.37	5.23	Are pilots and PECs subject to a disciplinary procedure?	Y	Within contract of employment, Pilotage Directions and Section 21 of the Pilotage Act.
.9	8.3.11	5.17 5.23	Does the harbour authority sub-contract pilotage?	Y	
.10	8.3.30 - 8.3.33	5.23	Does the harbour authority have formal agreements with pilots and pilotage sub-contractors regarding competence and discipline?	Y	As per 8.8
.11	8.3.11	5.18	Are pilot resources kept under review against requirements?	Y	See below.

8.1 COMMENTS

8.7 PEC annual revalidation requires holder to be accompanied on an inward or outward trip with a PHC pilot and demonstrate adequate local knowledge. However, PHC pilots, as part of their Continuing Professional Development, are only subject to an assessment every 5 years. A more frequent 'on-board' assessment in line with current PEC revalidation requirements should be considered including a formal record of such being kept on personnel file.

8.11 It was highlighted during meetings that since the pilotage requirement for dredgers >50m was introduced as well as the return of Brittany Ferries there may well be occasions when there is a shortfall of pilotage resources. In preparedness for this possible eventuality the HM is currently training another pilot.

9 TOWAGE

9	GtGP	PMSC		Y/N	Comment
.1	9.1	5.24	Does the harbour use tugs?	Y	1 x tug owned and operated by PHC – ‘Herbert Ballam’ -17t bollard pull.
.2	9.1.2	5.24 5.25	Does the risk assessment address use of tugs?	Y	
.3	9.2	5.24	Have towage services been fully assessed for suitability to the needs of vessels using the harbour?	Y	
.4	9.3.3	5.24	Are tug resources adequate for the needs in the harbour?	Y	
.5	9.3.4	5.24	Are tugs used in restricted visibility?	Y	At tug skippers’ discretion.
.6	9.3.4 9.3.5	5.24	Are any special guidelines in use for restricted visibility?	Y	PHC Towage Procedures includes a RA for operating in restricted visibility.
.7	9.3.9	5.24	Are there formal liaison arrangements between Harbour Masters, Tug Masters and Pilots, including training?	N	See below.
.8	9.3.10	5.24	Do the tugs have formal procedures that are contained in or referred to in the SMS?	Y	PHC Towage Procedures reviewed 20/3/11
.9	9.3.10	5.24	Has the harbour authority agreed with the tug operators a policy on correct gear and procedures for towing?	Y	

.10	9.3.10	5.24	Have tugs, their gear and procedures been fully integrated into the risk assessment as a risk control?	Y	As per PHC Towage Procedures.
.11	9.3.9	5.25	Do Harbour Masters' procedures include the facility to use special directions if masters and/or pilots propose departure from guidelines?	Y	Harbour Control guidelines.

9.1 COMMENTS

9.7 Consider introducing familiarisation training between tug skippers, PHC and sub-contracted pilots at a mutually agreed interval and formally recorded accordingly.

10 MARINE SERVICES

10	GtGP	PMSC		Y/N	Comment
.1	10.2		Does the harbour authority exercise any powers of regulation over port craft?	N	
.2	10.2.2		Where craft do not have to comply with national legislation does the harbour authority impose any form of inspection and licensing?	N	See below.
.3	10.2.2		Does the harbour authority possess the competencies to carry out inspections on port craft?	Y	PHC owned craft only.
.4	10.2.2		Does the harbour use outside contractors to carry out inspections of craft on its behalf?	Y	PHC owned craft inspections undertaken by MCA or by MCA (EG YDSA) approved surveyors.
.5	10.2.3		Does the harbour authority require minimum standards for vessels operating commercially in the harbour?	Y	Bunkering only. All other vessels are MCA governed.
.6	10.2.3		In the absence of legislation, does the harbour authority use formal agreements to confirm suitability of craft to which the risk assessment can refer?	N	

.7	10.3		Does the harbour approve pilot launches and workboats?	Y	
.8	10.4 10.4.5 10.4.6		Does the harbour authority control diving operations with a Permit to Work system?	Y	Harbour Control procedures Section 18.
.9	10.4.8		Does the harbour authority permit recreational diving in the harbour?	Y	
.10	10.4.10		Does the harbour authority exercise powers in relation to mooring of vessels in the harbour?	Y	Long established routine and procedural guidance in place both internally and with 3 rd part provision.

10.1 COMMENTS

10.2 There is a requirement within Poole Harbour to be licenced as a Boatman / Waterman in order to hire out craft. Licences are issued by the Borough of Poole local authority and applicants must have a full knowledge of statutory rules, regulations and byelaws applicable to navigation on the waters for which the licence is required.

New applicants must be endorsed by the Harbour Master to confirm that the applicant has sufficient knowledge to operate safely within Poole Harbour.

11 PROFESSIONAL QUALIFICATIONS AND COMPETENCIES

11	GtGP	PMSC		Y/N	Comment
.1	11.1	3.13	Do key staff in the Harbour authority hold appropriate qualifications?	Y	
.2	11.2 11.8	3.13	Does the Harbour Master hold an appropriate qualification?	Y	
.3	11.2 11.8	3.13	Do Deputy or Assistant Harbour Masters hold appropriate qualifications?	Y	
.4	11.3	3.13	Are pilots qualified additionally to their authorisation from the Harbour authority?	Y	
.5	11.4	3.13	Do VTS officers hold appropriate qualifications?	Y	
.6	11.5 11.9	3.13	Does the harbour authority ensure that operatives are suitably trained and competent?	Y	
.7	11.6	3.13	Does the harbour authority exercise control over the training and competence of tugs crews?	Y	
.8	11.7	3.13	Does the harbour authority employ, directly or indirectly, suitably qualified hydrographic surveyors?	Y	

11.1 COMMENTS

PHC exercise a tight control over qualifications and training. Full records are contained within the SMS system.

12 ACCIDENT INVESTIGATION AND ENFORCEMENT

12	GtGP	PMSC		Y/N	Detail/Comment
.1	12.1 12.1.5	3.14	Does the SMS include procedures for accident/incident investigation?	Y	
.2	12.1	3.14	Does the harbour authority follow a set procedure for informing MAIB?	Y	
.3	12.1.6	3.14	Does the investigation process separate offences for intervention by other agencies (Police/MCA/Environment Agency etc.)?	Y	The Harbour Master tailors investigations procedures to accommodate other agencies if/when necessary.
.4	12.1	3.14	Does the investigation process inform the risk assessment for review purposes?	Y	There is a well developed feed-back system.
.5	12.1	3.14	Does the review process include promulgation to harbour authority employees, subcontractors etc.?	Y	Information is fed back to both PHC staff and to the appropriate stakeholder groups.
.6	12.1	3.14	Does the promulgation of findings include the possibility of passing on findings to other organisations, e.g. Ports Group, Harbour Masters' body?	Y	
.7	12.1 1.2	3.18	Does the investigation process link with enforcement ?	Y	

12.1 COMMENTS

PHC run a well documented system and a use the results of their incident investigations to update the SMS and inform stakeholder groups.