



Delivering on seafarers' rights Self-assessment questionnaire

A seafarers' rights and welfare self-assessment questionnaire
for shipowners, operators, charterers and cargo owners

October 2021



RIGHTSHIP

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About this self-assessment questionnaire

This questionnaire is the result of work carried out by the [Sustainable Shipping Initiative's \(SSI\) *Delivering on seafarers' rights working group*](#), in partnership with the Institute for Human Rights and Business (IHRB) and in collaboration with RightShip. The self-assessment provides concrete guidance to shipowners, operators, charterers and cargo owners to understand the extent to which current operations meet their seafarers' rights and welfare obligations.



Institute for Human Rights and Business (IHRB)

Founded in 2009, IHRB is the leading international think tank on business and human rights. IHRB's mission is to shape policy, advance practice, and strengthen accountability in order to make respect for human rights part of everyday business.

www.ihrb.org | [@ihrb](https://twitter.com/ihrb)



Sustainable Shipping Initiative (SSI)

The Sustainable Shipping Initiative (SSI) is a multi-stakeholder collective of ambitious and like-minded leaders, driving change through cross-sectoral collaboration to contribute to – and thrive in – a more sustainable maritime industry. Spanning the entire shipping value chain, SSI members are shipowners and charterers; ports; shipyards, marine product, equipment and service providers; banks, ship finance and insurance providers; classification societies; and sustainability non-profits.

www.sustainablesshipping.org | [@SustShipping](https://twitter.com/SustShipping)



RightShip

Established in 2001, RightShip is the world's biggest third party maritime due diligence organization, providing expertise in global safety, sustainability and social responsibility practices. Founded with the mission to drive operational improvements in the global shipping industry, more than 3,000 people use RightShip's due diligence, environmental and inspections services to help them manage risk and improve overall maritime safety standards.

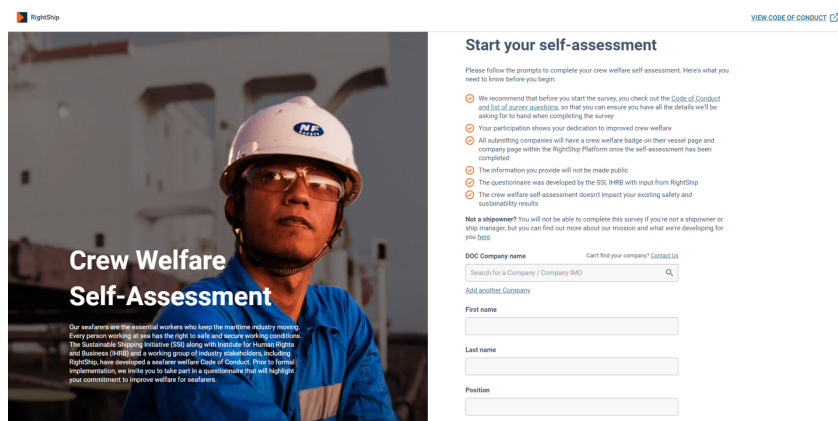
www.rightship.com | [@RightShip](https://twitter.com/RightShip)

Introduction

The self-assessment questionnaire in this document is part of [Delivering on seafarers' rights](#), a toolkit developed by the Sustainable Shipping Initiative (SSI) and the Institute for Human Rights and Business (IHRB) to fill key gaps in seafarers' rights and welfare and providing a single set of documents that can be implemented by shipowners, operators/managers, charterers and cargo owners.

The toolkit consists of:

- **Code of Conduct:** Developed in collaboration with the Rafto Foundation for Human Rights, the Code of Conduct is based on international labour and human rights standards and principles and goes beyond the International Labour Organization's (ILO) Maritime Labour Convention (MLC). The Code of Conduct focuses on the full spectrum of seafarers' rights and welfare, from fair terms of employment and minimum crewing levels to the appropriate management of grievance mechanisms.
- **Self-assessment questionnaire:** Developed in collaboration with RightShip, this self-assessment provides clear guidance on how to adopt the Code of Conduct as well as how to track progress against it. Completing the self-assessment can help organisations understand what actions they should take to improve crew welfare, as well as showcase demonstrable progress over time to secure lasting and positive change for our seafarers.



Crew Welfare Self-Assessment

Our seafarers are the essential workers who keep the maritime industry moving. Every person working at sea has the right to safe and secure work conditions. The Sustainable Shipping Initiative (SSI) along with Institute for Human Rights and Business (IHRB) and a working group of industry stakeholders including RightShip, have developed a seafarers welfare Code of Conduct. Prior to formal implementation, we invite you to take part in a questionnaire that will highlight your commitment to improve welfare for seafarers.

Start your self-assessment

Please follow the prompts to complete your crew welfare self-assessment. Here's what you need to know before you begin:

- We recommend that before you start the survey you check out the [Code of Conduct](#) and list of survey questions, so that you can ensure you have all the details we'll be asking for to hand when completing the survey
- Your participation shows your dedication to improved crew welfare
- All submitting companies will have a crew welfare badge on their vessel page and company page within the RightShip Platform once the self-assessment has been completed
- The information you provide will not be made public
- The questionnaire was developed by the SSI, IHRB with input from RightShip
- The crew welfare self-assessment doesn't impact your existing safety and sustainability results

Not a shipowner? You will not be able to complete this survey if you're not a shipowner or ship manager, but you can find out more about our mission and what we're developing for you [here](#).

DOC Company name Can't find your company? [CONTACT US](#)

Search for a Company / Company BAD

[Add another Company](#)

First name

Last name

Position

Crew Welfare Tool

The self-assessment questionnaire in this document accompanies the Code of Conduct – Delivering on seafarers' rights. The questionnaire can be completed online through a Self-Assessment Tool. Hosted by RightShip, the Self-Assessment Tool is free for any shipowner or ship operator/manager (DOC holder) to fill in. On completion, a Crew Welfare badge will appear on the company's vessel page within the RightShip Platform. Shipowners and ship operators/managers will be sent a PDF summary of their submission, and will be reminded to re-submit after a year.

[Visit the RightShip Crew Welfare Tool to learn more.](#)

How to use this document

The questionnaire provides practical guidance on adopting the Code of Conduct – *Delivering on seafarers' rights*, and where relevant, provides three levels of compliance:

- **Basic:** Achieving the basic level requires fulfilling all requirements for the basic level.
- **Intermediate:** Achieving the intermediate level requires fulfilling all requirements for the basic and intermediate levels.
- **Excellent:** Achieving the excellent level requires fulfilling all requirements for the basic, intermediate and excellent level.

PDF versions of the [Code of Conduct](#) and self-assessment can be downloaded for review and use offline. This document may be freely used by any interested party, and is merely intended as a printable self-assessment, with a blank “Observations” column to facilitate any notetaking or internal control process to review or confirm to what extent the user fulfils requirements.

When using this document to self-assess against the Code of Conduct, please note that to ensure an up-to-date, robust understand of the extent to which operations meet seafarers' rights and welfare obligations, the self-assessment should be completed or reviewed at least annually. Addressing sustainability issues is a journey, and the Code of Conduct and self-assessment are not intended to be a one-time snapshot or overnight change, but rather showcase demonstrable progress over time to secure lasting and positive change for our seafarers.

The self-assessment may highlight gaps or areas of improvement, and organisations can develop an internal crew welfare roadmap or action plan, setting goals or KPIs to measure against.

Part I: Shipowner and ship operator requirements

1	SHIPOWER/SHIP OPERATOR COMMITMENTS	OBSERVATIONS
	Commits to valuing seafarers and respecting their human rights. The shipowner/ship operator:	
1.1.	Has a written commitment to valuing seafarers, including by respecting their human rights, and to complying with the Maritime Labour Convention which reinforces seafarers' human rights.	
1.2.	Has a management system, supported by appropriate staffing and procedures, to manage compliance with the Maritime Labour Convention, other relevant health and safety requirements and the Code of Conduct – <i>Delivering on seafarers' rights</i> .	
1.3.	Informs and regularly trains seafarers (including officers and ratings) and other staff on seafarers' rights and the Code of Conduct – <i>Delivering on seafarers' rights</i> .	
	Basic <ul style="list-style-type: none"> Creates an environment in which all seafarers are informed, involved and able to exercise their rights. Information about seafarers' rights (e.g. Maritime Labour Convention practical guides, ITF resources, etc.) and the Code of Conduct is posted on notice boards or similar, and is visible and available in common spaces on board. Continually updates resources for seafarers e.g. regarding COVID-19 vaccinations available at certain ports, ITF's Seafarers' Bulletins, relevant guides, articles and publications about seafarers' rights and expectations when living and working onboard. 	
	Intermediate <ul style="list-style-type: none"> Provides the Code of Conduct and practical resources about seafarers' rights as part of onboarding. Training materials and delivery methods are concise and include tests to ensure content retention. 	
	Excellent <ul style="list-style-type: none"> Has a company-specific 'Statement of seafarers' rights' or similar, (based on international legal standards i.e. IMO and ILO) which is relevant, detailed, understandable and practical. The 'Statement of seafarers' rights' is included as an appendix to employment contracts and it must be signed as 'read and acknowledged' by the seafarer. [See 1.1.] Provides officers, as relevant (depending on rank and specific areas of responsibility), with access to external resources such as 'Course on seafarers' rights' or similar (based on international standards i.e. IMO and Maritime Labour Academy). 	

	Commits to an inclusive workforce. The shipowner/ship operator:	Observations:
1.4.	Promotes an inclusive working culture through leadership, training and mentoring to support open communications and improve morale and working relationships on board and with staff on shore ⁱ .	
Basic	<ul style="list-style-type: none"> • Sets a strong, pervasive culture of inclusiveness from senior management and at all levels throughout the vessel ranks by setting expectations of teamwork, respect and fair treatment among and between all seafarers. • Offers training and mentoring programmes for job skills, maximising learning through peer-to-peer knowledge exchange. 	
Intermediate	<ul style="list-style-type: none"> • Sets plans to increase the quantity, quality and variety of job skills training available for seafarers, depending on specific vessel needs (training offered to seafarers to develop their skills is not mandatory). • Allocates and respects a set time (amount of work hours) per week or month for seafarers to benefit from training available to them. • Has procedures and practices in place aimed at continually improving trust from upper management on lower-ranked seafarers to reduce micro-management and build confidence and teamwork. 	
Excellent	<ul style="list-style-type: none"> • In partnership with academic/training institutions, or through its own programmes, offers training in the maritime industry, job skills, languages, business technology, leadership/management, finance, and similar topics at various levels. • Promotes and sponsors seafarers' exchange ('Jump') programmes or similar, e.g. where seafarers of the same or similar rank exchange vessels for a set period of time (6 months or 1 year) to gain experience in other tasks within another crew, visit other ports, etc. Upon satisfactory completion of the 'Jump' programme, seafarers are qualified for upward mobility in their original vessel or a different one. • Implements a vessel policy aimed to develop empathy among seafarers, e.g. 1 week per year switch crew placements between ranks allowing seafarers in lower ranks hands-on experience with the next level rank under direct supervision, while also serving as training for the higher rank seafarers with a 'day in the life' perspective of the crew for whom they are responsible. 	

	Continued:	Observations:
1.5.	Commits to treating seafarers fairly, with respect and dignity ⁱⁱ , and without discrimination based on any protected characteristic.	
Basic	<ul style="list-style-type: none"> Provides company guidelines (e.g. “dos and don’ts”) to build and keep optimal social relations on board based on principles of fairness, respect and dignity. Hiring and promotion opportunities are based on merit (attitude, experience, knowledge, potential, qualifications, skill, talent, willingness to learn, etc.) and are made available on equal grounds, meeting the work requirements (including doctor’s recommendation on ‘Fit for duty’), regardless of any protected characteristic. [See 1.6.] 	
Intermediate	<ul style="list-style-type: none"> Has a company policy with zero tolerance to any form of discrimination against, and between seafarers, placing special emphasis that discrimination shall not occur based on crew hierarchy/ranks. The policy includes sanctions for infractions. Has an internal strategy to check the fair treatment of seafarers through e.g. surveys, questionnaires, direct observation, encouraging whistle-blowers and/or aided by CCTV cameras or microphones, etc. (complying with privacy and confidentiality requirements). 	
Excellent	<ul style="list-style-type: none"> Enforces anti-discrimination policy by internal audits and collaborates with external agencies that protect the rights and fair treatment of seafarers. Provides inclusion activities such as language and cultural exchanges to increase understanding of differences, build camaraderie, strengthen cooperation, thus reducing probabilities of discrimination. 	

	Continued:	Observations:
1.6.	Commits to equal opportunities in recruitment, hiring, development, promotion, terms and conditions of employment and benefits, recognising underrepresented groups in the industry. [See 1.5.]	
Basic	<ul style="list-style-type: none"> Has policies in place that encourage recruiting female staff on board. Has strict guidelines and regulations to ensure gender equality on board that grant protection from harassment specially towards women. Offers guidance on available career path opportunities and encourages seafarers to voice their planned path. (This also allows the company to gain visibility for human resources mid-term planning, and informs actions to create a robust crewing pipeline). 	
Intermediate	<ul style="list-style-type: none"> Acknowledges seafarers' desired career paths, and considers them in the next recruitment cycle by offering equal opportunities to all interested seafarers when vacancies open. Has policies in place to encourage promotions for all seafarers, especially women. Provides information to female seafarers about seafarers' unions and organisations supporting their career advancement and wellbeing on board such as the 'Women Offshore Foundation' which provides access to networking, mentoring, and professional development resources for female seafarers. 	
Excellent	<ul style="list-style-type: none"> Identifies and appeals to the needs of women and young workers in its recruitment policy. Continually looks to research and develop worker programmes aimed to benefit the professional development of all seafarers. All treatment, behaviour, attitude and opportunities are of equal footing, by ensuring opportunities are available and encouraged to individuals with protected characteristics. [See 1.5.] 	

	Continued:	Observations:
1.7.	Ensures that workplaces are free from discrimination, harassment, violence or retaliation of any kind.	
	Basic <ul style="list-style-type: none"> Includes in worker manual or similar specific mention of discrimination, harassment, violence or retaliation issues, setting the expectation to avoid any kind of discrimination, harassment, violence or retaliation on board or ashore in relation to the company. Ensures no job opportunities are denied on the grounds of gender, race, nationality or other protected characteristics. [See 1.6.] 	
	Intermediate <ul style="list-style-type: none"> Promotes caring regimes onboard, recognising that while senior officers set the tone, demands should be realistic, showing respect and dignity and never discriminatory, harassing, violent or done in retaliation. [See 1.5.] Incorporates issues of discrimination, harassment, violence or retaliation into company policy, including disciplinary action for violations. Has developed a clear process for reporting incidents through its grievance process and encourages all seafarers to use it when necessary. Supervises, through human resources and accounting records, that the company issues equal pay for work of equal value (for the same position and rank, with the same responsibilities). 	
	Excellent <ul style="list-style-type: none"> Has a zero-tolerance policy for discrimination, harassment, violence or retaliation, with specific protections for women and uses disciplinary actions of various degrees, including dismissal, to reprimand any worker of any rank on board or ashore who is involved with acts of discrimination, harassment, violence or retaliation. Has an internal process to monitor discrimination, harassment, violence or retaliation risks e.g. giving special attention to risky situations and having open communication (surveys and interviews) with seafarers, especially with minorities and vulnerable groups who have one or more protected characteristics. 	
	Does not seek on-going exemptions from rules protecting seafarers. The shipowner/ship operator:	
1.8.	Avoids seeking further exemptions over and above those already provided for in the statutory or regulatory framework related to human rights, including labour rights, environmental, health, safety or security, recognising that these rules are in place to protect seafarers, the public, the marine environment and the industry.	

2	FAIR TERMS OF EMPLOYMENT	OBSERVATIONS
	Ensures seafarer recruitment is free from risks of forced labour. The shipowner/ship operator:	
2.1.	Prohibits forced labour, including through practices that can lead to forced labour situations, such as through debt bondage due to the payment of recruitment fees and related recruitment costs, by verifying that seafarers have not paid fees or other charges for recruitment or placement to a seafarer recruitment and placement service, and includes this requirement in the shipowner's contracts with seafarer recruitment and placement services.	
2.2.	Verifies that seafarers have not been subject to fraud, substitution of contracts or retention of passports.	
2.3.	Verifies that seafarers are not charged other costs that are prohibited by the Maritime Labour Convention such as repatriation costs.	

	Provides fair terms of employment. The shipowner/ship operator:	Observations:
2.4.	Ensures that seafarers are paid in full, correctly (including for all time worked, for overtime and at the previously agreed upon rates), on time and at the official published rate or prevailing market rate not unfavourable to seafarers in accordance with seafarer instructions.	
	Basic <ul style="list-style-type: none"> Provides or, if using a Seafarer Recruitment and Placement Service, ensures that it provides Seafarer Employment Agreements in accordance with the Maritime Labour Convention. Ensures the vessel holds an ITF-approved collective agreement or demonstrable equivalent setting the wages and working conditions for all crew. [See 6.1. and 6.2.] Ensures the operator holds a transparent, efficient, and verifiable timekeeping system with a documented process to assure the recording of actual hours worked, including overtime specifications. Pays at least monthly and with a payment statement detailing wages and any deductions. Does not make any unauthorised deductions the seafarer has not agreed to. 	
	Intermediate <ul style="list-style-type: none"> Sets up a mechanism to track and evaluate gaps between times recorded and work actually delivered to identify and address any under- and/or misreporting of hours worked. Has a checklist to ensure records exist for each seafarer and for each contract. Ensures that, if payments are made in a different currency than they are issued, no currency exchange fees or other unauthorised or unagreed fees are charged to seafarers. 	
	Excellent <ul style="list-style-type: none"> Has a zero-tolerance policy for flawed, falsified or shammed logged work/rest hours. Makes each rank responsible for the correctness and accuracy of the logged-in data for the workers they supervise, and higher ranks are responsible for all reporting under them to be accurate. Increases severity of admonition and/or penalties for supervisors who misreport their subordinates' work data. Master provides information, guidance and training for new (stricter) policy and expectations. Ensures compensation is paid correctly at first instance and according to the conditions agreed. Performs periodic checks to assure rates are not unfavourable to seafarers. Findings are classified according to importance and resolved in a timely manner. 	
2.5.	Pays seafarers from the time and destination of departure to join the ship to the time of return to the destination selected for repatriation.	

	Continued:	Observations:
2.6.	Provides continuity of insurance coverage (additional health care, disability and retirement packages) during the period(s) on shore until return to the ship, covering seafarers (officers and ratings) and their families for those seafarers who have agreed to return to the ship(s).	
	Basic <ul style="list-style-type: none"> Ensures that every seafarer is covered by Social Security Protection (Maritime Labour Convention Regulation 4.5, paragraph 1 and 2) either contained in laws or regulations of the states of nationality/ordinary residency of seafarers or flag states, in private schemes, in collective bargaining agreements, or in a combination of these, and that is stated clearly in the Seafarers' Employment Agreements (SEAs). Ensures onshore health care insurance covers general medicine, dental and vision, compensation to spouse and children for permanent and temporary disability of the seafarer, and a basic retirement package in accordance with national standards (country of nationality/ordinary residence of the seafarer). Provides continuity of insurance coverage for at least 1 month onshore for seafarers that have worked at least 3 months on board. 	
	Intermediate <ul style="list-style-type: none"> In addition to the onshore health care insurance coverage needed to achieve a 'basic' level in this self-assessment, coverage also includes preventative health check-ups and access to social counsellors for seafarers. Has defined parameters to provide continuity of insurance coverage on shore that range between 1-2 months until return to the ship. 	
	Excellent <ul style="list-style-type: none"> In addition to the onshore health care insurance coverage needed to achieve a 'basic' and 'intermediate' level in this self-assessment, coverage also provides additional benefits e.g. access to professionals/experts in psychology, nutrition, and a healthy lifestyle. Permanent and temporary disability and retirement packages are generous and high quality. Ensures continuity of insurance coverage onshore is proportional to time worked on board, e.g. one month of coverage onshore for every three months worked onboard. Coordinates onshore coverage insurance policy with its crewing strategy to strive for short and pre-scheduled work contracts followed by short onshore (insured) periods, rather than long periods for both. This also helps reduce insurance costs onshore. 	
2.7.	Under contract agreements, all seafarers are free to join a workers' union of their choice.	

3	CREWING APPROACH	OBSERVATIONS
	Has a comprehensive crewing strategy to improve crew wellbeing and safety. The shipowner/ship operator:	
3.1.	Regularly monitors and evaluates its crewing strategy for its impact on crew wellbeing, including seafarer retention.	
	<p>Basic</p> <ul style="list-style-type: none"> Has a Monitoring & Evaluation process in place, including for the usage of Seafarer Recruitment and Placement Services. Ensures the Monitoring & Evaluation process is systematic and objective, and highlights specific cases of failures and successes (as determined by the crewing policy's effectiveness and impact on seafarers' wellbeing). Ensures the Monitoring & Evaluation process includes welfare indicators: e.g. quality of living, seafarers' satisfaction with their job, reduced number and severity of complaints, seafarer retention, in addition to work performance. Ensures the Monitoring process has a yearly analysis of seafarers' logged hours, work performance, living conditions, and complaints. Ensures the Evaluation process examines the relevance, effectiveness, efficiency and impact of the crewing strategy every 5 years. 	
	<p>Intermediate</p> <ul style="list-style-type: none"> Ensures the Monitoring & Evaluation process is performed as scheduled and without delays. Produced conclusions are practical and succinct to allow ship managers to take immediate action to correct the deficiencies as quickly as possible. Ensures the Monitoring & Evaluation process includes performing effective checks to ensure correctly recorded work and rest hours, including what, how, who, how long and proof/sign-off. Ensures the Monitoring process has a quarterly analysis of seafarers' logged hours, work performance, living conditions and complaints. Ensures the Evaluation process examines the relevance, effectiveness, efficiency and impact of the crewing strategy every 3 years. 	

	Continued:	Observations:
3.1.	Regularly monitors and evaluates its crewing strategy for its impact on crew wellbeing, including seafarer retention.	
	Excellent <ul style="list-style-type: none"> As part of monitoring and evaluating seafarer job satisfaction, conducts anonymous seafarer surveys. It can cover topics of wages, living conditions, and management, and uses it to feed back into the crewing strategy. Ensures the evaluation generates detailed lessons learnt and recommendations for the crew supervisors and the ship manager and informs the company's overall crewing policy. Shares results with all seafarers in a regular, transparent and comprehensive way. Ensures the Monitoring process has a monthly analysis of seafarers' logged hours, work performance, living conditions and complaints. Ensures the Evaluation process examines the relevance, effectiveness, efficiency and impact of the crewing strategy every year. 	

	Continued:	Observations:
3.2.	Crewing strategy recognises the importance of balancing onboard and onshore time periods for physical and mental wellbeing and specifies crew contract periods cannot exceed 11 months as specified in the Maritime Labour Convention to ensure crew wellbeing and safety.	
	Basic <ul style="list-style-type: none"> Ensures the maximum limit on crew contract periods is 11 months, as specified in the Maritime Labour Convention to ensure crew wellbeing and safety. Considers shifting crewing strategy towards shorter, pre-scheduled work contracts (This strategy would motivate seafarers to go to the sea frequently and also make them more enthusiastic about their work). 	
	Intermediate <ul style="list-style-type: none"> Has proactively set a maximum limit of crew contract periods between 3-9 months. Recognises the importance of onshore sea-staff seminars where seafarers meet other officers, onshore personnel and even company senior management in person. This helps improve the crew's social relations and offers opportunities for dialogue with seafarers, which could have a positive impact in wellbeing and employment retention. Has a crewing strategy that strives to place returning seafarers on the same vessel they have already sailed (This strategy reduces stress, shortens the adaptation period, and increases efficiency). 	
	Excellent <ul style="list-style-type: none"> Changes crew often (e.g. every 3 to 6 months) alternating crew membersⁱⁱⁱ on board to allow seafarers enough rest and family time, while ensuring a permanent and reliable crew supply year-round and increase in seafarer retention. Uses short, pre-scheduled work contracts or a similar crewing strategy to allow the company to offer round-the year-salary to seafarers. This ensures greater job security and financial stability for seafarers and their families. 	

	Sets crewing levels based on crew wellbeing and safety. The shipowner/ship operator:	Observations:
3.3.	Goes beyond the minimum crewing level legally required, and plans crewing levels based on realistic assessments of tasks that respects the value and ensures the wellbeing of seafarers.	
Basic	<ul style="list-style-type: none"> • All crew members (employed or engaged in work on a ship) are 16 years of age or older. • Crewing level is at least in accordance with the Minimum Safe Manning Document set by the Flag State • Crewing level is calculated as a function of the number of qualified and experienced seafarers necessary to operate the vessel. • Crewing level is enough to cope with all the workload and fulfil all responsibilities and requirements demanded of each seafarer within the 'maximum work hours' allowed (including COVID-19 safety and hygiene protocols). • Replaces retiring personnel with new hires as soon as possible to maintain a complete crew at all times. 	
Intermediate	<ul style="list-style-type: none"> • Total work demanded for each seafarer is realistic in terms of time, space, training, safety equipment, and physical and mental capacities of each seafarer • Manning level is enough to cope with all the workload and fulfil all responsibilities and requirements demanded of each seafarer within the 'basic work hours' allowed (including COVID-19 safety and hygiene protocols). • Ensures high quality management support on board (from supervisors to subordinates), meaning respectful treatment, teamwork spirit, guidance, and an overall attitude of 'being on the side of their supervised teams'. Management takes concrete actions to increase crewing level to limit pressure and stress on seafarers. 	

	Continued:	Observations:
3.3.	Goes beyond the minimum crewing level legally required, and plans crewing levels based on realistic assessments of tasks that respects the value and ensures the wellbeing of seafarers.	
	Excellent <ul style="list-style-type: none"> • Practises “Positive Shipboard Resourcing” by using its Monitoring & Evaluation process on its crewing strategy [See also 3.1.] to identify actual and potential strains on seafarers, and makes necessary changes including employing personnel beyond the minimum, in order to have leeway to handle an emergency effectively. • Has a comprehensive management plan with macro view of vessel workload, with full visibility on each section, each task, each checklist, so that new demands are not added in isolation of all other tasks being performed by seafarers. • Makes investments in technology and machinery aimed to reduce physical work of seafarers, improve efficiency, and reduce risks and liabilities for the shipowner/ship operator. 	
3.4.	Does not operate short-handed (except in exceptional emergencies for the shortest time possible).	

	Continued:	Observations:
3.5.	Demonstrates that it considers the impacts of peak work times (such as port calls) in setting crewing levels and the impact of crew fatigue on ship safety and crew wellbeing. ^{iv}	
	Basic <ul style="list-style-type: none"> Provides annual leave at minimum rate of 2.5 days per month of employment. Basic working hours are 48 per week and maximum work hours policy is: 14 hours in any 24-hour period and 72 hours in any 7-day period. Has implemented one of the daily rest periods of at least 6 hours. Assesses tasks, duties and responsibilities to meet peak workload situations, conditions and requirements, and ensure the welfare and health of seafarers by avoiding extreme fatigue. 	
	Intermediate <ul style="list-style-type: none"> Provides annual leave at minimum rate of 3 days per month of employment. Ensures basic working hours are 44 per week and maximum work hours policy is: 12 hours in any 24-hour period and 66 hours in any 7-day period (yielding to paying overtime for hours between basic and maximum, always in agreement with the seafarer and depending on the position's operational requirements). Has implemented one of the daily rest periods of at least 7 hours. Implements a 'fatigue risk management system' as part of the safety management system to ensure fatigue is considered in crewing arrangement. Depending on vessel's rotation and operational possibilities, aims to schedule weekly rest periods right after peak work times (e.g. port calls). 	
	Excellent <ul style="list-style-type: none"> Provides annual leave at minimum rate of 3.5 days per month of employment. Ensures basic working hours are 40 per week and maximum work hours policy is: 10 hours in any 24-hour period and 60 hours in any 7-day period (yielding to paying overtime for hours between basic and maximum, always in agreement with the seafarer and depending on the position's operational requirements). Has implemented one of the daily rest periods of at least 8 hours. Ensures vessel operations manager and/or company's local agency seeks to improve ship-shore relations to secure realistic berth windows that allow for all load and discharge operations with the manpower on board, without straining seafarers; and mediates to help release pressure from shore management on seafarers. 	

	Continued:	Observations:
3.6.	Manages crewing levels, through planning crew contract periods, in a flexible and resilient way, to account for sufficient crew to handle unexpected emergencies, while respecting the Maritime Labour Convention's maximum of 11 months on board. This avoids placing disproportionate burdens on seafarers during emergency situations.	
	Basic <ul style="list-style-type: none"> In the case of unexpected emergencies, if there is an operational need to extend crew contract periods: <ul style="list-style-type: none"> ➤ All parts of the employment agreement remain the same (e.g. agreed salaries, benefits, seafarers' rights and duties, regular and maximum hours of work, etc.). Does not expand work to fill the time available on board. Any changes to employment contracts are made to improve seafarers' wellbeing. ➤ Ship management fully respects crew rest hours, and if necessary, reduces non-essential functions, and rearranges work shifts (time of day, not length) to operate with minimum personnel, while a second shift rests, and vice-versa. 	
	Intermediate <ul style="list-style-type: none"> Ensures crew contract periods are staggered with some overlap (1-3 months depending on contract length) for the same rank or position, so there are at least two people who can perform the same job during the overlap period, allowing leeway for unexpected emergencies. Has 'Emergency Operating Procedures' that in case of extensions of crew contract periods due to unexpected emergencies: <ul style="list-style-type: none"> ➤ Reinforce wellbeing package, giving high priority to the physical and mental health of all seafarers. ➤ Provide to seafarers 'crisis management' training and ongoing wellbeing support. [See section 4 for details on what 'wellbeing support' entails] ➤ Ensure doctor, nurse, or medical trained person on board is in continuous communication with seafarers and informs ship management of the crew's mental and physical situation and any required actions. 	

	Continued:	Observations:
3.6.	Manages crewing levels, through planning crew contract periods, in a flexible and resilient way, to account for sufficient crew to handle unexpected emergencies, while respecting the Maritime Labour Convention's maximum of 11 months on board. This avoids placing disproportionate burdens on seafarers during emergency situations.	
	<p>Excellent</p> <ul style="list-style-type: none"> Has 'Emergency Operating Procedures' that in case of extensions of crew contract periods due to unexpected emergencies: <ul style="list-style-type: none"> ➤ Ensure ship management demonstrates leadership, teamwork and high-quality mental and physical support. Supervisors are encouraging, motivational and keep morale up. ➤ Provide extra benefits for seafarers' wellbeing and comfort, under the extenuating circumstances of the emergency, e.g. extra food and extra rest when possible; shifts sleeping arrangements to allow better rest to seafarers with higher work demands; allocates and respects daily or weekly time for communication with families and quiet personal time. ➤ Improve employment agreements (e.g. increase salaries and/or benefits) and if seafarers' duties have to change (such as increase in work hours, degree of responsibility, or additional risks to safety), compensates seafarers accordingly: in time, wages and insurance coverage. [See section 4] 	

4	CREW WELLBEING	OBSERVATIONS
	Prioritises crew wellbeing. The shipowner/ship operator:	
4.1.	Has a Physical and Mental Wellbeing Plan, or wellness programme(s), supported by a designated and appropriately trained wellbeing officer and a welfare budget, as an integral part of measures to address occupational health and safety for all its seafarers. ^v	
	<p>Basic</p> <ul style="list-style-type: none"> • Under the Wellbeing Plan, assesses crew according to five criteria: physical, emotional, intellectual, spiritual, and social aspects and has the capacity to create programmes, activities and/or obtain resources to help improve each area of wellbeing. • Under 'Physical Wellbeing', the Plan includes accommodation spaces that are decent, safe (free from evident dangers), clean (free from unpleasant smells, grease, dust or dirt), ventilated, and have acceptable noise levels and appropriate heating, lighting and sanitation. • Has allocated human and financial resources to carry out the Plan. Wellbeing responsibilities may fall under the 'Health & Safety Officer', but the monthly welfare budget is separate. 	
	<p>Intermediate</p> <ul style="list-style-type: none"> • Monitors crew wellbeing periodically (e.g. through surveys, interviews, or consultations) including listening to and actioning suggestions from seafarers for improvement of their wellbeing areas. • Under the Wellbeing Plan, considers improvements to crew accommodation and comfort such as increasing cabin size to min. 5 sq. mts/person (regardless of vessel tonnage, whether cabin is of single/multiple occupancy or seafarer's rank), increasing cupboards/shelving areas, and providing A/C when ambient temperature is out of the range 10-30°C. • Under 'Spiritual Wellbeing', the Plan includes activities such as yoga, meditation and materials (e.g. books, videos, guides) about self-development and/or mindfulness. • Under 'Social Wellbeing', the Plan includes planning, organisation and offering of activities to promote engagement with others (onboard and ashore) and the natural environment (ashore). • Has allocated human and financial resources to carry out the Plan: the wellbeing officer has social background qualifications (wellbeing responsibilities may fall under the 'Health & Safety Officer' with qualifications in social area), but the monthly welfare budget is separate. 	

	Continued:	Observations:
4.1.	Has a Physical and Mental Wellbeing Plan, or wellness programme(s), supported by a designated and appropriately trained wellbeing officer and a wellbeing budget, as an integral part of measures to address occupational health and safety for all its seafarers.	
	Excellent <ul style="list-style-type: none"> Includes personalised assessments and guidance for seafarers and tailors its wellbeing programmes, activities and/or resources to their specific needs. Has allocated human and financial resources to carry out the Plan: the wellbeing officer has a background in social work applied to the shipping industry (or similar), and is separate from the 'Health & Safety Officer'. The monthly welfare budget is separate. Uses wellbeing budget in full consultation with seafarers, including through participatory methods such as participatory budgeting and/or voting on its allocation. 	

	Continued:	Observations:
4.2.	Prioritises mental health, including by providing mental health support and access to free and confidential counselling for seafarers.	
	Basic <ul style="list-style-type: none"> • Supports seafarers in dealing with stress whether it is ship or personal related, e.g. by providing, or signposting providers of, counselling services. • Offers free access to a compilation of external sources of support and for seafarers to contact in confidence: e.g. maritime trade unions, seafarer welfare organisations and centres, etc. • Provides mental health training for vessel management (i.e. master, chief engineer, chief officer and second engineer), such as the 'Mental Health Awareness Training for the Maritime Industry' by The International Seafarers' Welfare and Assistance Network (ISWAN), including consideration of subordinates' safety and wellbeing when asking them for additional tasks. 	
	Intermediate <ul style="list-style-type: none"> • Provides training for all on-board personnel on wellbeing and mental health, such as 'Wellness at sea', including mindfulness and/or empowerment to encourage seafarers to speak up when demands from senior officers risk their own safety and wellbeing. • Has procedures and methods to collect information about seafarers' mental health (e.g. surveys, interviews, observation, open-door policy, an effective grievances mechanism, etc), analyses the main work-related stressors for seafarers, and informs vessel (crew and operations management) of possible solutions. 	
	Excellent <ul style="list-style-type: none"> • Prioritises shore leave for seafarers at each port call and encourages visits to local nature when available. [See 4.6.] • Offers online consultations with a certified mental health professional to provide personalised advice and/or therapy depending on individual needs. Online consultations are available at all times and free of charge. As a preventive measure, the company recommends holding at least one session every three months. 	

	Continued:	Observations:
4.3.	Provides Seafarer Assistance Programmes.	
Basic	<ul style="list-style-type: none"> Provides (pays for) crew with Seafarer Assistance Programmes on financial literacy and stress/anxiety (or similar) 	
Intermediate	<ul style="list-style-type: none"> Provides (pays for) crew with Seafarer Assistance Programmes on a variety of topics including at least financial literacy and stress/anxiety (or similar) and basic legal assistance. Provides (pays for) Seafarer Assistance Programmes to the seafarers' spouse and children. Encourages the use of Seafarer Assistance Programmes by sending reminders of their availability, notices of new programmes (or similar). 	
Excellent	<ul style="list-style-type: none"> Provides (pays for) crew with Seafarer Assistance Programmes on a wide variety of topics including at least financial literacy and stress/anxiety (or similar), and others such as occupational burnout, post-traumatic stress disorder (PTSD), depression, and wellness and nutrition (or similar) and basic legal assistance. Follows up with seafarers to ensure Seafarer Assistance Programmes have been helpful for their situation and asks for feedback to inform the quantity and quality of their Seafarer Assistance Programmes. 	

	Continued:	Observations:
4.4.	Provides recreational facilities and encourages social interaction among and between fellow crew members and provides internet access for private, personal use (including access to email, social media and communications), onboard for seafarers free of charge, that is limited only for justified reasons of safety, (cyber)security, and responsible use when off duty.	
	Basic <ul style="list-style-type: none"> Offers facilities e.g. computer rooms on board where crew can access the internet free of charge, including access to private and confidential email communication for responsible use when off duty. 	
	Intermediate <ul style="list-style-type: none"> Offers designated spaces e.g. Wi-Fi areas on board where crew can access the internet free of charge from their mobile devices, for responsible use when off duty. Provides recreational facilities, including entertainment equipment (TV, radio, video, CD, DVD, PC), gym/sport facilities, table and deck games, stocked library. Assesses recreational facilities in its entire fleet, and where needed, the company plans to adapt common spaces for recreation and ensures vessels in the orderbook have these facilities. Under exceptional circumstances, such as an emergency, increases the internet access or Wi-Fi allowance. [See 8.4-8.7.] 	
	Excellent <ul style="list-style-type: none"> Provides Wi-Fi coverage in most of the vessel including cabins. The crew can connect to the network free of charge from their mobile devices for responsible use when off duty. Demonstrates an understanding that vessels are not only work places but ‘living places’ for seafarers, by having high-quality recreational facilities in each vessel on its fleet, and plans recreational and wellbeing activities for the crew to encourage social interaction. Works together with naval architects, mental health professionals, psychologists, and organisations that support seafarers, to have a multi-disciplinary assessment of seafarers’ needs. Feeds that assessment into the design and construction of future vessels and raises the industry’s standard by leading by example. Arranges social activities for seafarers on board. Basic information about these activities (e.g. reason, participation, time frame, resources, etc.) is recorded for satisfaction monitoring and improvement actions to be taken. 	

	Continued:	Observations:
4.5.	Provides fresh, healthy, quality food and water, of sufficient quantity, nutritional value, and variety, considering religious and medical requirements and cultural practices.	
	Basic <ul style="list-style-type: none"> Ensures the cook holds appropriate qualifications and the catering staff has been trained properly and sufficiently. All are at least 18 years old at the time of hire. Ensures spaces used for food storage, preparation and serving are clean, hygienic and in a good state of repair. Temperature for refrigerators and freezers is adequate to keep all food fresh and non-expired. Keeps a food and catering budget that is at industry average. Provides water that is clean and fresh and is at least 2 litres/person/day. Provides meals balanced of carbohydrates, protein, fat and fibre, vitamins and minerals. Food is prepared and cooked with minimum levels of salt, fat and sugar. 	
	Intermediate <ul style="list-style-type: none"> Provides a selection of food, high in protein to fulfil the nutritional needs of seafarers that perform physical work during long periods of time. High protein food includes fish, meat, poultry, eggs, milk and other dairy products; and for vegetarians: legumes, soy products, grains, nuts and seeds. Keeps a food and catering budget that is above industry average, reflected in above average quality food and provides additional meal choices. 	
	Excellent <ul style="list-style-type: none"> Conducts a 'Diet Questionnaire' about the workers' alimentary habits, and any religious or medical requirements or dietary restrictions. The shipowner/ship operator anonymises, aggregates and incorporates that data into orders of catering/provisions from ship chandlers and has a designated appropriate budget for special reasonable requests. Keeps a food and catering budget that is well above industry average, reflected in high quality food, a great variety of meal choices, and/or dietary supplements. 	

	Continued:	Observations:
4.6.	Grants shore leave to benefit seafarers' health and wellbeing, consistent with the operational requirements of their positions and subject to port state restrictions.	
	Basic <ul style="list-style-type: none"> Has no 'shore leave ban' at any time. Denial of shore leave is not used as punishment under any circumstance. Any denial has a justified operational, legal or safety substantial reason. Arranges visits to a qualified medical doctor or dentist without delay in ports of call, when necessary. 	
	Intermediate <ul style="list-style-type: none"> Has policies in place to make sure master and chief officers prioritise shore leave for seafarers in subsequent ports if, for any reason, shore leave was denied at previous port. As part of preventive health programmes, promotes and encourages ashore visits to a qualified medical doctor or dentist, and considers seafarers health and wellbeing needs when planning port operations, to fulfil them as much as operationally possible. 	
	Excellent <ul style="list-style-type: none"> Includes vessel policies that implement 'shore leave rotations' to ensure that seafarers that for any reason have not enjoyed shore leave, are prioritised over those who have left already. All seafarers have shore leave at least once per month. This policy aims to protect seafarers' rights without sacrificing manpower on board. Includes in the company policy a minimum shore leave time that each seafarer is entitled to, keeps accurate records to ensure it is done, and uses them to inform, improve, and extend future 'shore leave policy'. Works proactively with port authorities, local, and national governments to advocate, negotiate and ensure shore leave is guaranteed for its vessels' seafarers, and lobbies with local authorities for the interests and wellbeing of its crew during port calls. 	

5	CREW PROTECTION		OBSERVATIONS
	Has appropriate systems to keep crew safe and secure. The shipowner/ship operator:		
5.1.	Has a security management system to protect seafarers from piracy and other criminal activity. The system provides appropriate preparatory training for seafarers and for armed security personnel, and it includes anti-piracy non-lethal weapons.		
5.2.	In the event that the vessel suffers an emergency or threat [see 5.1.], the security management system includes communication and psycho-social support for the affected seafarers and their families.		
	Basic	<ul style="list-style-type: none"> Provides daily updates through email, text messages, website with live updates, etc., and information on internal and external resources available for their wellbeing (e.g. 24-hour help line, contact information of local welfare organisations, etc.). Commits to re-employ seafarers willing and able to work following the crisis, in their same position and with the same salary as agreed in their Seafarers' Employment Agreement (SEA). Commits to continue payments to the affected seafarers, 100 percent of their salaries, throughout the duration of a crisis situation. 	
	Intermediate	<ul style="list-style-type: none"> Has set procedures to mitigate harm and prioritise physical and mental wellbeing of seafarers and their families, during an emergency situation. (Procedures depend on the type of emergency, but as a general rule should include having a plan to protect the rights to life, safety and security of seafarers through the company's available means and resources). Provides online psycho-social support for children and adolescents of affected seafarers: e.g. peer-to-peer groups, guidance on safe recreational activities, and life-skills and vocational training. 	
	Excellent	<ul style="list-style-type: none"> Through the company's network of local agencies or by partnering with various local organisations, provides in-person psycho-social support to the families of the affected seafarers in their home towns. Includes seafarers' welfare considerations in security risk assessments (in determining severity/consequences of the emergency). Impact analysis includes expenditures to provide support to seafarers and their families e.g. communication and psycho-social support, on-going payment, and re-employment. 	

	Continued:	Observations:
5.3.	Ensures any armed private security providers on board have received training on the rules on the use of force and on respecting the human rights of those affected by security operations, including seafarers.	
5.4	Commits to protecting the rights of their crews during any criminal investigations following accidents, including the seafarers' rights to avoid self-incrimination, to fair treatment, and to payment of wages, subsistence, accommodation and medical care.	
5.5	Ensures that seafarers are not abandoned and complies with the Maritime Labour Convention requirements on abandonment, including maintaining continuous financial security to cover abandonment of seafarers, and cooperates to resolve any relevant claims concerning abandonment.	

6	ADDRESSING SEAFARER GRIEVANCES		OBSERVATIONS
	Has accessible and appropriate complaint/grievance handling processes on board and on shore. The shipowner/ship operator:		
6.1.	Fosters a culture that supports raising and addressing concerns.		
	Basic	<ul style="list-style-type: none"> Includes a complaints procedure on board, that is easy, understandable and anonymous, including a resolution date and guarantees of no retaliation of any kind. All seafarers are aware of this procedure and their full right to use it. Advises seafarers about its grievance processes and provides clear information about internal and external contacts that can address grievances, including trade unions, seafarer support societies, Port State Control (PSC) and Protection and Indemnity Insurance (P&I) clubs. Ensures the vessel holds an ITF-approved collective agreement or demonstrable equivalent that allows, enables, and promotes workers representation. [See 2.4] 	
	Intermediate	<ul style="list-style-type: none"> Handles complaints within the time limits of the resolution date. A complaint is considered addressed, once a solution is achieved, or the issue is escalated by the person responsible for handling complaints (on board or ashore). Ensures the entire grievance reporting process respects the seafarers' rights to privacy, confidentiality and fair treatment with respect and dignity, regardless of what the complaint was and who reported it. 	
	Excellent	<ul style="list-style-type: none"> Analyses complaints to identify recurring issues and macro problems that need to be addressed at company's local, regional, or headquarters level; highlights the importance of seafarers' input and fosters a culture of raising and addressing concerns by encouraging and thanking whistle-blowers. Communicates results of the analysis, resulting patterns of complaints, and key issues, to the person/department within the company responsible for addressing the issue, and/or to the 'Well-being Officer'. Adjusts company policy to reflect the identified aggregated needs of seafarers. 	

	Continued:	Observations:
6.2.	Has a variety of avenues, including those provided for in the Maritime Labour Convention, for crew to raise concerns, including whistle-blower procedures that can be contacted anonymously, that are accessible and provide grievance processes on fair, informed and respectful terms that can resolve or support resolution of grievances and that protect privacy and confidentiality.	
	Basic <ul style="list-style-type: none"> • Informs all grievance channels can be used to raise a complaint before, during and after employment. • Informs all grievance channels are confidential i.e. complaints can be anonymous. • Has an on-board procedure e.g. submission form in paper and/or online, web platform, etc. with enough space and flexibility to voice out the full complaint in all its aspects and non-conformities, as well as all details if it is linked to a specific incident or person. The procedure allows for a clear indication of: the statement, demand, requested resolution date, and involved person(s), and details. • Has processes to ensure the complaint is registered and taken seriously. It goes through a standard process of investigation, fact-finding mission, and corrective actions. • Seeks to resolve the matter at the level that it occurred (lowest possible), with the possibility to escalate if input, knowledge, approval, or involvement is necessary from upper ranks; and with the right of the seafarer to complain directly to a higher-ranked officer, the master him/herself, or external authorities. • The escalation process is delineated clearly in the 'onboard complaint procedures' and is in accordance with Maritime Labour Convention's Guideline B5.1.5, paragraph 2. 	
	Intermediate <ul style="list-style-type: none"> • Ensures there is no labelling of the seafarer as 'problematic' or 'complainer' for the mere fact of reporting one or many concerns. • Provides contact information of seafarers' welfare centres and/or authorised officers, at every port of call, to whom seafarers can voice concerns ashore. • Designs processes for complaints to be routed through an active union. representative on board that is known to all crew. [See 2.1. and 2.4.] • Encourages all personnel to report suspected or actual occurrence(s) of illegal, unethical or inappropriate behaviours or practices, including any violation of seafarers' rights, and guarantees protection against retaliation of any kind. 	

	Continued:	Observations:
6.2.	Has a variety of avenues, including those provided for in the Maritime Labour Convention, for crew to raise concerns, including whistle-blower procedures that can be contacted anonymously, that are accessible and provide grievance processes on fair, informed and respectful terms that can resolve or support resolution of grievances and that protect privacy and confidentiality.	
	Excellent <ul style="list-style-type: none"> Enhances grievance mechanisms through any type of 'worker voice platform'. Has access to worker representation in place, per rank and/or per vessel. i.e. designated person through whom their colleagues can channel communication of concerns to their superiors, the chief officer, or the master. The process is known, open, and free from any retaliation. Ensures complaints can be submitted in the worker's own language. 	
6.3.	Ensures there is protection against retaliation, including no blacklisting by the shipowner, vessel operator, or the seafarer recruitment and placement service for raising grievances.	

	Continued:	Observations:
6.4.	Maintains records, in accordance with data privacy standards and confidentiality requirements, of the issues raised and addressed in seafarers' grievances/concerns on its ships across internal and external channels and considers these as input for continuous improvement.	
Basic	<ul style="list-style-type: none"> Registers all complaints on board, with copy to the seafarer and to the Shipboard Grievance Officer, or similar in charge, for pending resolution. Ensures records of complaints, their processes, and resolution status are available to vessel inspectors (e.g. by the regulatory authority, port state control, seafarer's organisations, or company internal accountability) and are handled in a confidential manner. 	
Intermediate	<ul style="list-style-type: none"> Has a process that includes the Wellbeing Officer and/or shore-based ship manager also receive a copy of complaints raised. He/she/they follow up after the 'requested resolution date' with the Shipboard Grievance Officer to ensure each complaint has found a satisfactory resolution. Conducts worker wellbeing surveys, including seafarers' overall satisfaction with the job and the way complaints are handled. Uses survey results to inform grievance processes. (To be coordinated between Shipboard Grievance Officer and Wellbeing Officer). Has a process that includes the Shipboard Grievance Officer, or similar in charge, performs analysis and statistics of complaints, their processes, and resolutions and uses results to improve grievances procedures and seafarers' welfare on board. 	
Excellent	<ul style="list-style-type: none"> Establishes a Company Grievance Officer' at national, regional or global HQ level, a dedicated department or specific functions within a department, to monitor all seafarers' complaints on board its vessels. It oversees the reports, their timely handling, and coordinates corrective actions with ship managers ashore. Includes in the job function of the Company Grievance Officer, or similar, analysis of grievances reported to identify major issues/repeating complaints across several vessels. Develops corrective action plans (for implementation on board, ashore, or at larger company level) to resolve issues in a permanent way. 	

7	IMPLEMENTATION OF THE CODE OF CONDUCT	OBSERVATIONS
	Implementation of the Code of Conduct – <i>Delivering on seafarers’ rights</i> . The shipowner/ship operator:	
7.1.	Acknowledges that the charterer/cargo owner counterparty requires access to information about conditions for seafarers on its ships, subject to data privacy and confidentiality as relevant, to address the issues covered in the Code of Conduct – <i>Delivering on seafarers’ rights</i> .	
7.2.	Communicates the requirements of the Code of Conduct – <i>Delivering on seafarers’ rights</i> to its workers, and to any other entity responsible for the operation of its ships and recruitment and placement of seafarers, and ensures that it has the legal mechanisms to require compliance by them with the Code of Conduct.	
	Self-assessments and risk-based auditing. The shipowner/ship operator:	
7.3.	Conducts an annual self-assessment against the requirements of the Code of Conduct – <i>Delivering on seafarers’ rights</i> .	
7.4.	Maintains relevant documentation required to demonstrate compliance with the Code of Conduct – <i>Delivering on seafarers’ rights</i> and required laws and agrees to make such documentation available to the charterer or cargo owner counterparty and its designated auditor as evidence of compliance, if requested.	
7.5.	Facilitates access to its ships to conduct audits in line with the Code of Conduct – <i>Delivering on seafarers’ rights</i> , if requested.	

	Corrective action. The shipowner/ship operator:	Observations:
7.6.	Where the shipowner/ship operator finds through its own tracking or self-assessment or where the charterer/cargo owner counterparty identifies that the Code of Conduct – <i>Delivering on seafarers’ rights</i> is not being met, the charterer/cargo owner counterparty and the shipowner/ship operator will agree on corrective actions and reporting on progress made in taking those corrective actions.	
Basic	<ul style="list-style-type: none"> • Sets an annual date to perform its self-assessment, and agrees with its charter party(ies) on a set annual date for mutual check of self-assessments being done. • Identifies major issues of non-compliance (clauses in this document answered “No” or not fulfilling the “Basic” level), sets goals to remedy shortcomings and improve performance through an action plan with internal processes and a set 'accomplishment' date within a year of self-assessment. • Seeks assistance from RightShip, ITF, its regulators, or other partner organisation(s), on the practical implementation of challenging questions/issues, and seeks to answer “Yes” to clauses in this document, and to advance levels of compliance (e.g. from fulfilling only the “Basic” level in a clause to “Basic” and “Intermediate”, to all three levels where relevant). 	
Intermediate	<ul style="list-style-type: none"> • Shares its self-assessment macro-level results with its charter party, and seeks negotiations the charter party that enable and facilitate its compliance with the Code of Conduct e.g. rejection of "no crew change" clause. [See 8.1.] • Exchanges ideas with charter party about implementation of the Code of Conduct and self-assessment, discusses parts that each party finds difficult to implement, reasons behind them (e.g. technical, operational, financial, administrative, etc.), and possible solutions. 	

	Continued:	Observations:
7.6.	Where the shipowner/ship operator finds through its own tracking or self-assessment or where the charterer/cargo owner counterparty identifies that the Code of Conduct – <i>Delivering on seafarers' rights</i> is not being met, the charterer/cargo owner counterparty and the shipowner/ship operator will agree on corrective actions and reporting on progress made in taking those corrective actions.	
	Excellent <ul style="list-style-type: none"> Tracks progress and ensure in a year's time or by the 'accomplishment' date, the results of the self-assessment have improved by at least 25 percent. Allocates financial and human resources for compliance with the Code of Conduct and improvement of the Self-Assessment results, on a yearly basis e.g. a responsible person within the company to oversee compliance with seafarers' rights, with a budget and authority within the company to action in the various areas of the Code of Conduct. Shares progress made on the Code of Conduct with its charter party(ies) e.g. yearly self-assessments, its action plan for improvement, and specific corrective actions, pointing out specifically to pivotal points where the charter party has leverage to contribute or hinder the shipowner/ship operator's efforts to comply with the Code of Conduct. 	
	Reporting on incidents. The shipowner/ship operator:	
7.7.	Agrees to share the charter party, and across their value chain, cases of best practices and solutions derived from the Code of Conduct – <i>Delivering on seafarers' rights</i> , for learning, knowledge exchange and continuous improvement of the industry.	

Part II: Charterer and cargo owner requirements

8	CHARTERER AND CARGO OWNER REQUIREMENTS		OBSERVATIONS
	The charterer or cargo owner supports the implementation of the Code of Conduct – <i>Delivering on seafarers' rights</i> across the sector by progressively chartering ships from shipowners/ship operators that meet the Code of Conduct as follows:		
8.1.	Establishes targets to shift its charters to shipowners/ship operators meeting the Code of Conduct – <i>Delivering on seafarers' rights</i> , so that by the end of Year 3 from the date of commitment, a majority of the ship it charters meet the Code of Conduct.		
8.2.	Establishes its own annual targets to attach or incorporate the Code of Conduct – <i>Delivering on seafarers' rights</i> as a condition to charter party agreements, in order to meet 8.1.		
8.3.	Has the strategy, procedures and resources to use the Code of Conduct – <i>Delivering on seafarers' rights</i> and self-assessment as part of its due diligence processes. This enables the charterer to assess if and how shipowners/ship operators are meeting the Code of Conduct and use that information in its chartering decisions.		
	Basic	<ul style="list-style-type: none"> • Shares the vision of the importance of seafarers' welfare and makes a commitment to support the implementation of the Code of Conduct on the vessels it charters. • Has a policy or procedure in place to communicate to the shipowner the importance of respecting seafarers' welfare in general, and the Code of Conduct/self-assessment in particular e.g. through a Memorandum of Understanding, a formal inquiry about current crew welfare policies, requests of information about the shipowner/ship operator commitments, terms of employment, crewing approach, crew's wellbeing, protections, and grievances procedures. 	
	Intermediate	<ul style="list-style-type: none"> • Requires that the shipowners/ship operators complete the self-assessment and requests to see the detailed results to use that as a factor in decision-making for their chartering business. • Uses the Code of Conduct/self-assessment to (1) analyse the shipowner/ship operator's approach to seafarers' welfare and (2) set minimum objectives/expectations to improve such approach during the course of their business relationship/contract. • Uses information from its financial and/or human resources (e.g. from CSR, due diligence, legal compliance, etc.) in addition to Code of Conduct and self-assessment to make informed chartering decisions (i.e. probing for the desired standards of crew welfare). 	

	Continued:	Observations:
8.3.	Has the strategy, procedures and resources to use the Code of Conduct – <i>Delivering on seafarers' rights</i> and self-assessment as part of its due diligence processes. This enables the charterer to assess if and how shipowners/ship operators are meeting the Code of Conduct and uses that information in its chartering decisions.	
	Excellent <ul style="list-style-type: none"> • Sustains dialogue and negotiations with shipowners/ship operators to demand at least basic compliance with the Code of Conduct as part of the charter party agreement, which could be verified by a competitive shipbroker or an independent inspector based on the self-assessment questionnaire. • Develops and implements a process to make its own investigation on compliance of the Code of Conduct e.g. through direct observations, surveys and interviews to the crew, request anonymised data on terms of employment, work/rest hours logs, and/or grievances reports. Discusses findings with the shipowners/ship operators, collaborates with implementation, and if necessary, conditions business relationship to remedying any major shortcomings found. • Has allocated a budget and a designated person or responsibilities within a team to scrutinise and help shipowners/ship operators with the implementation of the Code of Conduct on board its vessels. 	
8.4.	While recognising the challenges for all parties, as a matter of principle refrains from including 'no crew change' clauses in charterparty agreements it signs, subject to any exceptional and justified legal restrictions.	
8.5.	Avoids taking measures designed to circumvent safeguards on crew changes.	
8.6.	Works actively and constructively in dialogue with shipowners/ship operators, governments and others in the sector to help facilitate crew changes and ensure safeguards on crew changes are protected. [See 8.8.]	
8.7.	Depending on circumstances and to the extent that they allow, assists shipowners/ship operators in their crew change planning by sharing nearby intentions for the employment of the vessel.	

	Continued:	Observations:
8.8.	Collaborates with shipowners/ship operators to support their implementation of the Code of Conduct – <i>Delivering on seafarers' rights</i> and to improve their performance over time, and in particular on issues of repeated complaints by seafarers. [See 8.6.]	
Basic	<ul style="list-style-type: none"> • Avoids 'no crew change' and 'no deviation' clauses in charter agreements which go against seafarers' rights and the Code of Conduct. • Keeps continuous communication with the shipowner/ship operator about any potential risks to seafarers' rights or non-compliance with the Code of Conduct identified during business relationship with the shipowner/ship operator. 	
Intermediate	<ul style="list-style-type: none"> • Oversees some aspects of the Code of Conduct according to its degree of involvement in operations and in the shipowner/ship operator company policies (depending on charter type), and raises red flags to the shipowner/ship operator for any actual or suspected wrongdoings. • Agrees with the shipowner/ship operator to help track compliance with relevant aspects of the Code of Conduct (depending on charter type) over time. • Performs periodic reviews on grievance procedures and records to identify issues of repeated complaints by seafarers, and discusses potential solutions with the shipowner/ship operator. 	
Excellent	<ul style="list-style-type: none"> • Has a documented process to ask the shipowner/ship operator for compliance with the Code of Conduct as a whole or its thematic areas for the vessel they are chartering. It can also perform the check itself based on the information available to the charterer (detail and extension of the 'accountability check' depends on charter type). • Proposes measures to be taken or improved to permanently resolve identified welfare complaints/issues. In the case of time or demise charter, negotiates with the shipowner/ship operator to implement and co-finance needed changes. 	

	Continued:	Observations:
8.9.	Collaborates with others across the sector and uses its leverage to advocate for strengthening respect of seafarers' rights.	
	Basic <ul style="list-style-type: none"> Commits to be transparent with stakeholders, including shipowners/ship operators, regulators, academic institutions and NGOs/seafarers' organisations regarding its policy and operations relevant to seafarers' rights. Recognises publicly what are the major human rights issues to seafarers: i.e. crew changes permissions, forced labour/debt bondage, mental health, living/working conditions, shore leave, grievances procedures, etc. and commits to address them in its business. This could be in the form of a public statement, website declaration, company policy, etc. 	
	Intermediate <ul style="list-style-type: none"> Has a revision procedure to ensure its own policies and operations, and its charter contractual demands are free from abuses to seafarers' rights. Is member of one or several multi-stakeholder groups (including shipowners/ship operators, regulators, academic institutions, NGOs/seafarers' organisations, etc.) and industry platforms that conduct activities focused on seafarers' rights. Shows interest to build internal knowledge e.g. by commissioning specialist studies or impact assessments to better understand the real challenges of seafarers, and shares knowledge and resulting practical actions to address those issues implemented from its leverage points. 	
	Excellent <ul style="list-style-type: none"> Has procedures in place to detect, report, remedy and compensate any human rights risks or violations found on its own operations or through its business relations with other actors across the sector (e.g. verifying Seafarers' Employment Agreements meet fair terms of employment, ITF guidelines and the Code of Conduct). Engages in policy dialogue with shipowners/ship operators and national/local governments to promote compliance and enforcement of Flag and Port State responsibilities under the Maritime Labour Convention, specifically to clarify and define ambiguities, and address potential and actual risks to seafarers' rights. 	
8.10.	Reports on its commitment to support the Code of Conduct – <i>Delivering on seafarers' rights</i> , including progress made on 8.1. and 8.2., e.g. percentage of its chartered vessels meeting the Code of Conduct, status of adoption of the Code of Conduct in its charter agreements, and its own assessment of risks to seafarers' rights and any actions taken. Progress reports are published annually and publicly.	

Glossary

Development: A wide concept including training, coaching, courses, projects or opportunities aimed at the personal or professional advancement of a worker. Usually includes development soft skills as well through e.g. exposure to new challenges, or shadowing a more experienced worker.

Emergency scenarios: Can include (but is not limited to) structural failure/heavy weather damage, failure of main propulsion, steering gear failure, electrical power failure, collision, grounding / stranding, shifting of cargo, flooding, fire, abandoning ship, man over board, search and rescue, serious injury, piracy, armed robbery, terrorism, cyber threat, wrongful detention, kidnap, extortion, and violent crime; as well as other force majeure problems that prevent seafarers from disembarking and finishing their work contacts as agreed e.g. due to inclement weather, unforeseen rerouting, or political emergency regulations that prevented crew changes such as during the COVID-19 pandemic. In principle, if seafarers continue performing their work duties, they should be remunerated for the job done.

Hiring: The process of placing the chosen candidate into a position i.e. the offer process, acceptance, and may include pre-boarding screening and up to orientation.

Insurance coverage: Refers to insurance coverage provided by the shipowner that complements basic social security entitlements of seafarers, i.e. beyond the “compulsory insurance against work-related injuries, sickness or unemployment.

Mental health and psycho-social support (MHPSS) in emergencies: MHPSS can include (but is not limited to) regular, structured activities to develop skills to deal with crises, solve problems, regulate emotions, and form and maintain relationships. MHPSS can be provided to seafarers and their families, who may suffer severe psychological and social consequences in case of, for example, piracy attacks or other criminal activity overseas.

Occupational Health and Safety (OHS): Principles and actions that prevent accidents, injury or illness at work (e.g. ISM code).

Promotion: Advancement of a worker to a higher rank or role involving more work, greater responsibility and higher status, usually associated with a salary increase.

Protected characteristics: Protected characteristics include age, civil status, colour, culture, descent, disability, gender, language, maternity/paternity, national or ethnic origin, political opinion, pregnancy, race, religion and sexual orientation.

Recruitment: The active search to fill out an open position including posting of a vacancy, sourcing, screening, interviews, etc.

Seafarer Assistance Programmes: Work-based intervention programmes designed to assist seafarers in resolving personal problems that may be adversely affecting the seafarers’ performance. This can include alcohol or substance abuse, child or elder care, relationship challenges, financial or legal problems, wellness matters, and traumatic events like workspace violence. Assistance programmes are delivered at no cost to the seafarer by stand-alone providers who are part of comprehensive health insurance plans. Services are often delivered via phone, video-based counselling, online chatting, e-mail interactions or face-to-face.

Social security: Refers to the protection that a society provides to individuals and households to ensure access to health care and to guarantee income security particularly in cases of old age, unemployment, sickness, invalidity [disability], work injury, maternity or loss of a breadwinner.

Wellbeing and welfare: Wellbeing is understood as a state of being including physical, emotional, intellectual, spiritual and social aspects.

Endnotes

ⁱ **Refers to 1.4. (p.7):** Key issues identified by the Seafarers' Happiness Index 2020 pertain to attitude, consideration, care, and (human and financial) resources. This refers, for example, to superior officers adopting a draconian attitude towards lower-ranked seafarers, and lack of consideration of the available time to perform tasks and protocols, i.e. not respecting rest hours. Some seafarers expressed “quality of management support is going down day-by-day, with more performance pressure and less manpower”, which speaks of the lack of human resources and budget available to increase manpower to match operational demands without straining workers. “Too much pressure from the company leads to poor environment on the vessel”, which translates into high levels of stress that put at risk the health, wellbeing, and safety of seafarers, also causing lowered morale and lack of motivation.

ⁱⁱ **Refers to 1.5. (p.8):** There is a fine line between giving work-related orders as an officer (superior in rank), in order to operate the vessel, vs. doing so in an unfair and discriminatory way, e.g. using derogatory language, aggressive attitude, or carrying out punishments against lower-ranked seafarers. All seafarers, as all human beings should be treated fairly, with respect and dignity, regardless of their social or professional position.

ⁱⁱⁱ **Refers to 3.2. (p.16):** Example of alternating crew schedule: Changing crew every 3 months and alternating between 2 seafarers that perform the same function, each one working two 3-month periods a year (one can work January-March and July-September, while the other works April-June and October-December). The salary equivalent for those months of work can be spread out in the year, so they receive a fixed and secure pay cheque every month and have departure and return dates pre-scheduled months in advance. In this way, seafarers can use a fixed schedule for temporary work ashore, and use the months they are not abroad productively. Likewise, the company would also benefit from long-term crew planning, and higher seafarer retention due to a more productive, satisfied and motivated workforce.

^{iv} **Refers to 3.5. (p.19):** Reducing the ‘Basic working hours’ and ‘maximum working hours’ progressively in the levels: has the potential to keep or even improve productivity as the crew will be less tired, but multiple variables come into play. The proposed reduction from one level to the next is 4 ‘basic work hours’ and 2 ‘maximum work hours’, per week. A rough estimate is that for every 10 seafarers with reduced hours, the shipowner would need 1 additional person (without accounting for/assuming additional productivity during working hours due to increased rest.) Thus, at a factor of 1x10, impact on extra cost, accommodation constraints, lifesaving equipment, and insurance, would not be exorbitant.

^v **Refers to 4.1. (p.22):** While Occupational Health and Safety (OHS) is better known in the industry due to the risks and liabilities implied, the concept of ‘Seafarers’ wellbeing’ is much wider encompassing various additional spheres of health, and its risks and liability are, unfortunately, much less understood in the industry. The welfare or wellbeing budget would be destined to all plans, activities, resources, programmes that are needed to constantly try to improve seafarers’ wellbeing in all its five aspects (physical, emotional, intellectual, spiritual and social). Expenditure should be determined in consultation with seafarers.

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