

DOCKYARD PORT OF PORTSMOUTH

MARINE SAFETY PLAN

Issue 4 Published 16 September 2022

GLOSSARY

SEMS	Safety and Environmental Management System
ALARP	As Low As Reasonably Practicable
CHA	Competent Harbour Authority
DP	Designated Person
DPMSP	Dockyard Port Marine Safety Policy
DPF	Dockyard Port Forum
DPPO	Dockyard Port of Portsmouth Order 2005
DPoP	Dockyard Port of Portsmouth
DPRA	Dockyard Port Regulation Act 1865
DPAB	Dockyard Ports Advisory Board
DPB	Dockyard Ports Board
GD	General Direction
HAZID	Hazard Identification
IALA	International Association of Lighthouse Authorities
KHM	King's Harbour Master
LNTM	Local Notice to Mariners
MAIB	Marine Accident Investigation Branch
MarNIS	Marine Navigation Information System
MCA	Maritime and Coastguard Agency
MOD	Ministry of Defence
NBC	Naval Base Commander
NAVWARN	Navigation Warnings
PWC	Personal Water Craft (Jetski)
PMSC	Port Marine Safety Code
PSO	Port Safety Officer
PSBO	Port Safety Boat Officer
QEC	Queen Elizabeth Class (Aircraft Carriers)
RIB	Rigid Inflatable Boat
RN	Royal Navy
SoS	Secretary of State
SNPCC	Solent Navigation and Pilotage Coordination Committee
SHA	Statutory Harbour Authority
VTMS	Vessel Traffic Management System
VTS	Vessel Traffic Service

CONTENTS

1. Introduction	Page 4
2. Safety and Environmental Management System	Page 4
3. Risk Management	Page 5
4. Conformance with and review of policy, legislation and guidance	Page 6
5. Periodic Review of Data	Page 7
6. Employee Competence Training, Navigational & SEMS Awareness	Page 7
7. Port User Involvement	Page 8
8. Communication of Navigational Safety to all Stakeholders	Page 8
9. Equipment and infrastructure	Page 9
10. Effectiveness of and Continual Improvement of the Navigational SEMS	Page 9

1. INTRODUCTION

The King’s Harbour Master Portsmouth’s (KHM) primary responsibility is to serve the defence interests of the UK and in discharging these duties, to facilitate the safety of navigation for all water users within the limits of the Dockyard Port of Portsmouth (DPoP). These responsibilities overlap with those of the Portsmouth International Port, which holds both Competent Harbour Authority (CHA) and Statutory Harbour Authority (SHA) responsibilities for various areas within the Dockyard Port limits and ABP Southampton who have overlapping CHA responsibilities and Vessel Traffic Service (VTS) responsibilities via a local memorandum of understanding.

At the heart of KHM’s responsibilities is adherence to the Port Marine Safety Code (PMSC) as required by the Defence Marine Regulator’s DAS02 Health and Safety document. In support of these, KHM Portsmouth’s Navigational Safety Policy sets out the overarching principles by which this is achieved and the Safety and Environmental Management System sets out the detail. This Dockyard Port of Portsmouth Marine Safety Plan is designed not to repeat the procedures set out in the above documents, but instead to set out how their key tenets will be further developed over the next three years – the period 2022 to 2025, in consultation with port users and stakeholders.

2. SAFETY AND ENVIRONMENTAL MANAGEMENT SYSTEM

The process used to implement, modify or develop the SEMS is shown in **Figure 1** below.

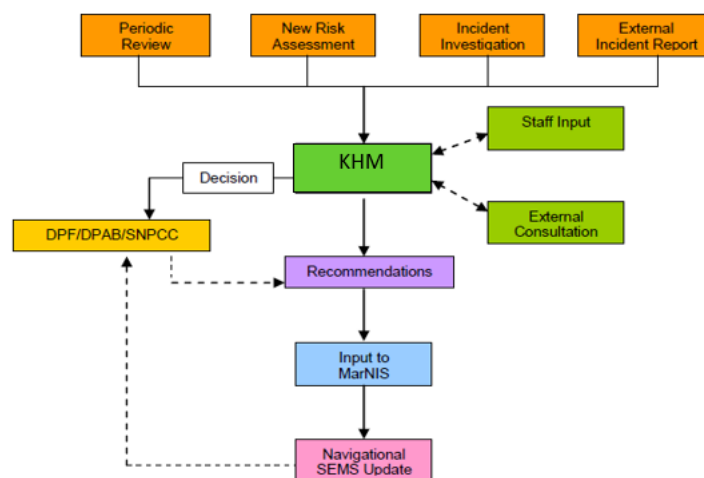


Fig 1 - SEMS Development Process

At the time of publication of this plan, the DPoP Safety Management System is at version 14 and has evolved into the Safety and Environmental Management System (SEMS). Version 14 is a cumulative revision of the previous versions and is based on widespread consultation with port stakeholders at a HAZID event held in Autumn 2016 that enabled KHM staff to revise and refresh the port’s suite of Risk Assessments and in turn, to review the underpinning processes and procedures involved in operating the port; these procedures make up the supporting documentation and annexes to the SEMS. With the revised SEMs now in place, a continual process of refinement and checking has occurred including an annual SEMS Management Review and further annexes will be added as required.

As part of the SEMS, KHM Portsmouth has continually revised this plan with the strategic objectives to:

- Identify Risks and Hazards within the port and continue to reduce risk to a level that is “as low as is reasonably practicable” (ALARP) or eliminate it;
- Ensure conformance with the navigational safety and marine policies, associated operating controls, applicable port and marine legislation and the spirit of non-statutory obligations;
- Conduct a rolling review of KHM’s powers and legislation, ensuring its relevance and effectiveness in achieving navigational safety and the operational requirements of the port;
- Periodically review data gathered from audits, inspections, incidents and any concerns raised to evaluate and determine where improvements and changes need to be made;
- Maintain employee competence training and SEMS awareness programmes;
- Facilitate port user involvement in the maintenance of the SEMS and the overall improvement in the provision of navigational safety;
- Communicate KHM’s ongoing efforts and challenges regarding navigational safety to all stakeholders and seek their assistance with implementing policies and procedures where appropriate;
- Ensure the ongoing development and compliance of equipment and infrastructure used in the provision of navigational safety;
- Review the effectiveness of and continually improve the SEMS.

This plan and its strategic objectives will be reviewed in consultation with port stakeholders through the Dockyard Port Forum (DPF) and members of the Dockyard Port Advisory Board (DPAB or its successor), at least three yearly.

3. RISK MANAGEMENT

A risk management approach for the identification, assessment and control of risks within the port is laid down in the SEMS. This approach is consistent with the PMSC with the underlying principle being to reduce significant risk associated hazards over which the KHM and other regulatory stakeholders have control to a level that is ALARP. This risk assessment process enables port staff to ensure that risk control strategies remain effective and that new measures are implemented where identified as necessary or beneficial. Following the HAZID event in Autumn 2016, all risks were re-categorised under hazard titles using KHM’s MarNIS risk management database. With a suite of approximately 50 risk assessments, they are reviewed at least annually on a rolling basis, although risk assessment reviews may be brought forward in response to incidents or external reports such as from the Marine Accident Investigation Branch (MAIB) and stakeholders are invited to take part in these risk assessment reviews as appropriate. In addition to existing risk assessments, where new or novel processes are introduced to the port it is KHM policy to conduct further HAZID to identify where new risk assessments may be required or which existing risk assessments require reviewing in order to ensure they contain suitable control measures for the activity in question. It is planned to hold a further overarching HAZID event with port stakeholders in the final quarter of 2022 or in early 2023. This was originally planned for 2020, but was overtaken by the impact of the COVID-19 pandemic and several manpower changes. Areas that may need attention include the increase of activity in the DPoP from vessels capable of degrees of autonomous operation. This includes both military-led and commercial activity.

In some instances, commercial companies or organisations may be the most appropriate authority to lead on marine risk assessments for an activity that they conduct within the boundaries of the DPoP; this is particularly the case when they directly manage the control measures in place or have responsibility for dealing with the outcomes of an incident associated with their activity. KHM strives to collate all relevant risk assessments for these activities and will continue to canvas companies and organisations through the twice-yearly Dockyard Port Forum (DPF) and by direct invitation to submit their risk assessments so that KHM can be assured that suitable measures are in place and understand the hazards that may come out of them that require further assessment by KHM staff.

Event organisers for regular and one-off leisure events are also required to submit risk assessments to the Port Safety Officer (PSO) for oversight purposes and so that an event calendar can be maintained in order to monitor conflicting and concurrent levels of activity, and to ensure suitable risk control measures such as local notices are published where appropriate. Even with over 1000 notified organised events having taken place over 2021, it is still believed that a number of events go un-notified to KHM. KHM's Port Safety Boat Officer (PSBO) engages with the marine leisure community and through liaison with local clubs, marinas and event organisers, has improved the notification of events to KHM and ensures that organisers are assisted in the production of high-quality event risk assessments; these can be produced using the KHM Risk Assessment Template¹ available on the website.

4. CONFORMANCE WITH AND REVIEW OF POLICY, LEGISLATION AND GUIDANCE.

In accordance with the requirements of the PMSC, KHM Portsmouth strives to ensure compliance with navigational safety and marine policies, associated operating controls, applicable port and marine legislation and non-statutory obligations.

A key area for legislative review over the period of this plan is a revision of the Rules and Regulations contained in Statutory Instrument 2005 No 1470 (Dockyard Port of Portsmouth Order 2005 (DPPO)). As the core legislative document affecting safety and port efficiency, amendment is needed in order to: reflect changes in operating procedures, infrastructure and security procedures, predominantly in support of the Queen Elizabeth Class aircraft carriers (QEC); clarify ambiguities that exist within the current Port Order that could compromise safety; introduce a new man-of-war anchorage reserved for QEC; consider rationalisation of port limits to best match appropriate and available resources against the requirements of Defence. Measures under consideration will be widely consulted with adjacent harbour and local authorities, and port users to ensure the safety implications of any changes are ALARP.

More widely, the PMSC requires that KHM liaises with and involves local practitioners, port users and other interested parties in the management of marine operations and navigational safety in the port. As such, an organisational structure has been developed in Portsmouth and the Solent that includes but is not limited to a number of routes for consultation, legislation, reporting and guidance.

The Organisational structure for the development and oversight of safety policy and regulation for the DPoP is shown in **Figure 2**.

¹ <https://www.royalnavy.mod.uk/KHM/portsmouth/using-the-port-for-recreation>

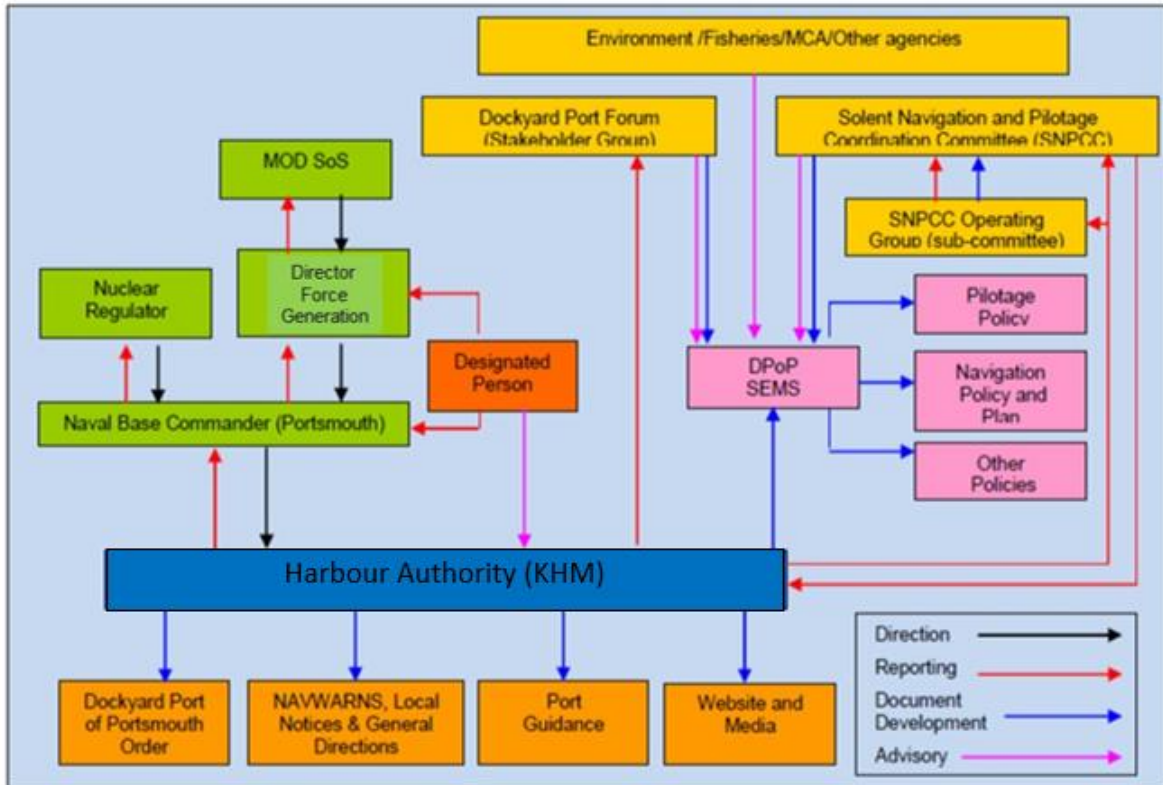


Fig 2 - Oversight of Safety Policy and Regulation

5. PERIODIC REVIEW OF DATA

KHM periodically reviews data gathered from a wide range of sources including audits, inspections, incidents, near miss reports and concerns/observations raised to monitor performance and identify any trends or developing risks that may require a review of the related risk assessments and/or control measures to be implemented. These processes are detailed in the procedural annexes to the SEMS and pertinent information is published in KHM’s Annual PMSC Report published on the KHM website.

One of the metrics used to contrast and compare with industry standards, is a ratio based on numbers of navigational incidents per 1000 moves. The challenge with using this metric is ensuring accuracy of reporting (both levels and quality) across such a diverse and geographically wide area as the DPoP, and understanding relative levels of activity at any given time. This requires a degree of judgement and the Port Safety team have been working to ensure that reports are assessed and either included in the MarNIS database for investigation and/or statistical information, or if scant and deemed insufficient for warranting inclusion in MarNIS, are recorded within a Complaints and Reports database. Quality statistics could be further aided by improved levels of reporting, particularly from the leisure sector, and also a greater understanding across all stakeholders of the importance of near miss reporting which is a vital tool in understanding trend development and risk. Through liaison with the Dockyard Port Forum and the public, the Port Safety team will be working over the period of this plan to continue to develop the culture of reporting incidents and near misses.

6. EMPLOYEE COMPETENCE TRAINING, NAVIGATIONAL & SEMS AWARENESS

KHM will regularly conduct employee competence training and SEMS awareness programmes to keep staff properly trained. In particular for marine staff, KHM will continue to:

- Identify operational and safety training needs;
- Work to the MOD Maritime Skills Framework of competency levels required for key tasks;
- Plan how training requirements are to be met and when; and,
- Establish a process to appraise the effectiveness of training.

With a number of tenets of the SEMS now revised as well as a wide-ranging legislative review, KHM will ensure provision of briefs and workshops for staff to ensure appraisal of:

- An overview of all relevant legislation, SEMS, General Directions and KHM Standing Orders;
- A review of the Navigational Safety Policy;
- An outline of Management and Operating procedures, and their provisions;
- The principles of individual accountability and responsibilities;
- An outline of response to emergencies and contingencies; and,
- Health and safety.

The COVID-19 pandemic has inevitably affected operations, with personnel availability reduced at times. However, careful management and operational practices in line with industry COVID responses have preserved operational services. However, the impact on personnel training was at times significant, and recovering this is a priority as restrictions are lifted.

7. PORT USER INVOLVEMENT

KHM facilitates port user involvement in the maintenance of the SEMS and the overall improvement in the provision of navigational safety via the Dockyard Port Forum (DPF) which openly invites participation from across the marine commercial and leisure community within and around the DPoP. Additionally, stakeholders from all sectors are invited to attend risk assessment reviews where appropriate. In the last year, a consultation has comprised work on changing entry reporting points working with Portsmouth International Port on their current and future business development plans as well as involvement in a number of significant coastal works programmes and marine business development plans.

Over the coming period, the ongoing review of the Dockyard Port of Portsmouth Order (see Section 5) will require a variety of public consultations as well as rigorous risk assessment for which port user involvement will be sought.

8. COMMUNICATION OF NAVIGATIONAL SAFETY INFORMATION TO ALL STAKEHOLDERS

KHM routinely publishes General Directions (GDs), Local Notices to Mariners (LNTMs) and Navigation Warnings (NAVWARNs) on the website and these are distributed to a mailing list signed up to by a wide range of stakeholders and port users. Most of the content on the website is dedicated to navigational safety information and is heavily used. With a high level of coverage it is an ideal medium through which to communicate navigational safety information to stakeholders and as such, through the period of this plan, KHM staff will be working to routinely revise the content of the website, to keep it relevant and useful to mariners.

The DPF is well attended by a wide variety of stakeholders including harbour authorities, commercial operators, marinas and clubs and has been used as a means to disseminate information to their customers and members. The PSBO has improved engagement with the

small boat community, markedly increasing the number of talks conducted to organisations around the Dockyard Port, including significant use of remote meetings during the COVID period. This is likely to continue, as while face-to-face engagement is advantageous, remote meetings can increase coverage. Traffic changes to cater for the new channel alignment and QEC operations have settled down, with most harbour users familiar with the arrangements.

The KHM Volunteer Harbour Patrol operates in Portsmouth Harbour entrance to advise and assist vessels less than 20 metres operating in the small boat channel. Additionally, the KHM RIB has increased the frequency of safety and enforcement patrols. A key tenet of KHM's enforcement policy is education and the PSBO has developed a regular patrol routine with assisting and educating water users being the main effort, as well as evidence gathering for investigation and prosecution purposes where more stringent controls are needed in order to manage safety on the water.

The current licensing regime for Personal Watercraft² will remain in place for the time being as a key means for monitoring identities of local operators and allowing KHM to disseminate relevant rules and regulations. The process will be reviewed as necessary.

The yachting and boating media paid a keen interest to Portsmouth Harbour during the capital works to prepare for QEC and were a useful means of disseminating safety information. KHM aims to maintain engagement with these media channels in order to reinforce safety measures and changes as they arise.

9. EQUIPMENT AND INFRASTRUCTURE

KHM Portsmouth's updated Vessel Traffic Management System (VTMS) has now settled into its home on the 5th floor of Semaphore Tower. Maintenance dredging continues in the main channels and MOD berthing areas. With some minor exceptions, the revised channel is not requiring additional effort to maintain depths.

10. EFFECTIVENESS OF AND CONTINUAL IMPROVEMENT OF THE SEMS

In considering the safe operation and management of the harbour, KHM will monitor and review performance against key indicators as described in Section 5 as well as progress implementation of measures and areas for development set out in this plan. Progress will be reported annually at the Dockyard Port Forum and through the KHM's PMSC Annual Report which will be published on the KHM website³.



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16 September 2022

² <https://www.royalnavy.mod.uk/KHM/portsmouth/using-the-port-for-recreation/personal-watercraft>

³ <https://www.royalnavy.mod.uk/KHM/portsmouth/safety-and-regulations>