



UK Code of Practice & Safety Critical Systems

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Overview

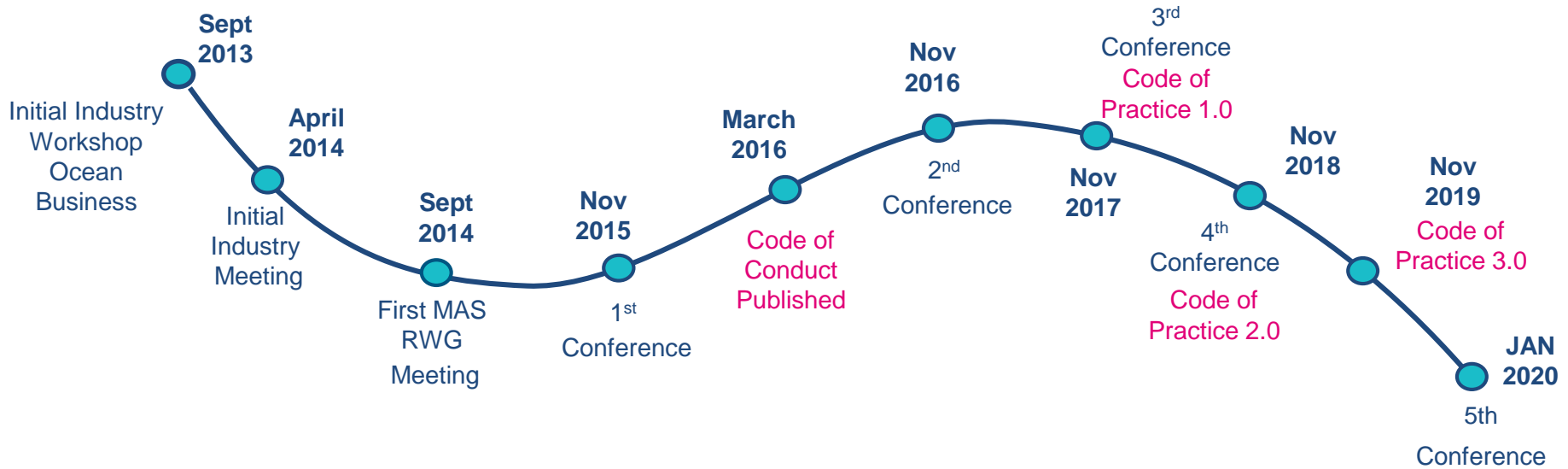
- Development of The Code of Practice
- Code Contents and significant changes
- Looking Ahead
- Safety Critical Systems
- Next Steps

Development of the MASS UK Industry Conduct Principles and Code of Practice v.3.0

- UK Maritime Autonomous Systems Regulatory Working Group (MASRWG)
- Chairmanship of James Fanshawe, support of Maritime UK
- 53 organisations contributed
- Regular meetings, sub-committees for continuing discussions



The Timeline



Code Contents

FOREWORD

- 1 Background
- 2 Environmental Considerations
- 3 Health and Safety Regulations
- 4 Authorisation of ROs
- 5 Contributing Organisations

PART 1 – MASS INDUSTRY CONDUCT PRINCIPLES

- 1 Scope
- 2 Application
- 3 Industry Manager's Responsibilities
- 4 Health and Safety
- 5 Environment
- 6 Product Safety Design and Construction
- 7 Customer Information
- 8 Assurance Certification and Authorisation for use
- 9 Trade Restrictions Aand Export Controls
- 10 Operational Responsibilities
- 11 Regulatory and Legislative Compliance
- 12 Training and Development

PART 2 – UK CODE OF PRACTICE

- 1 Terms and Terminology
- 2 Application
- 3 Operations
- 4 Safety Management
- 5 Automation on Inland Waterways
- 6 Ship Design and Manufacturing Standards for MASS
- 7 Navigation Lights, Shapes and Sound Signals
- 8 Situational Awareness and Control
- 9 Communications Systems
- 10 Remote Control Centre – Operation
- 11 System Integrity Certification and Test Procedures
- 12 Operator Standards of Training, Qualifications, Competence and Watchkeeping
- 13 Identification, Registration, Certification, Examination, Maintenance and Record-keeping
- 14 Security
- 15 Prevention of Pollution
- 16 Carriage and Transfer of Cargo (including Dangerous Goods)
- 17 Rendering of Assistance to Persons in Distress at Sea
- 18 Salvage and Towage
- 19 Glossary

Significant Changes Incorporated

- Code of Conduct and Code of Practice now in a combined document
- 53 Organisations Authorities have contributed (Version 2.0 - 34)
- Key Changes:
 - ❑ Terms and Terminology update to reflect IMO and ISO 23860*
 - ❑ New Chapter 5: Automation on Inland Waterways
 - ❑ Summarises the current position for automation on Inland Waterways in Europe to reflect the increasing interdependence of vessels operating between inland waterways and other sea areas.
- Chapter 6 Ship Design & Manufacturing Standards for MASS
 - ❑ Includes early statement on Safety Related Systems / Software
- Chapter 10 Remote Control Centre – Operation
 - ❑ New terminology and revised roles and responsibilities
- Chapter 12 Operator Standards of Training, Qualifications, Competence and Watchkeeping
 - ❑ Significant Revisions

Looking Ahead

Following Publication of Version 3.0

- Formed 3 Sub Groups
- Governance and Regulation (Chair, Richard Westgarth)
 - ❑ Covers: Future Workstreams, Leadership, Stakeholder Engagement, Regulatory Framework, Legal, Insurance, Business Services and Trading.
- Codes and Operations (Chair, James Fanshawe)
 - ❑ Covers: the Codes of Conduct and Practice, Infrastructure, Test and Demo Environments, Technology Developments, Registration and Conference.
- People and Skills (Chair, Gordon Meadow)
 - ❑ Covers: Training and Skills, Human Element and Ethics.

Watch out for Version 4.0!

Safety Critical Systems

Why should we be concerned?

- As we enter the 2020's - development of smart and autonomous ships, smart ports, smart trading systems, adoption of AI technologies such as Machine Learning will continue to challenge our ability to keep pace;
- Numerous examples from other sectors of some of the potential difficulties we may face:
 - Increased Complexity
 - Data driven systems
 - Unpredictable systems
 - Transfer of decision making from people to machines
 - Ethics and societal acceptance
- Throughout the Code, reference is made to Safety, Risk Assessments, Software Integrity.....but I would suggest it needs much greater detail

“Autonomous Systems disrupt established practices of system design, moral responsibility, legal liability and safety assurance”

Software is everywhere

- MASS are complex systems with highly interlinked components
 - ❑ Communications
 - ❑ Sensors, sensor fusion and decision making
 - ❑ System monitoring and reporting
 - ❑ Remote Control Stations
 - ❑ Artificial Intelligence and machine learning
 - ❑ Human / system interactions
 - ❑ Oh – and the ship!
- This is a challenge for all sectors



Safety Impacts of Software

- Software is brilliant – means it is used everywhere;
- Numerous ways it can contribute to safety, e.g. if:
 - ❑ the system is completely automated by software
 - ❑ the software produces and/or presents information to an operator that is used as the basis for decision-making
 - ❑ the software can act in such a way as to introduce, realise or prevent mitigation of a hazard (e.g. a control system)
 - ❑ software interacts with other system components



Boeing 737 Max Joint Authorities Technical Review

- Broad Recommendations:

- ❑ ...derive from the **increasing complexity** of aircraft systems, particularly **automated systems** and the **interaction and the interrelationship between systems**.
- ❑ As aircraft **systems become more complex**, ensuring that the **certification process adequately addresses potential operational and safety ramifications** for the entire aircraft that may be caused **by the failure or inappropriate operation of any system**
- ❑ As systems become more complex and may interact in unforeseeable ways, the likelihood increases that **regulations and standards will not address every conceivable scenario**.
- ❑ To the extent they do not address every scenario, **compliance with every applicable regulation and standard does not necessarily ensure safety**.
- ❑ Moreover, as **systems become more complex**, the certification process should ensure that aircraft incorporate **fail-safe design principles**.

Boeing 737 MAX Flight Control System



Observations, Findings, and Recommendations

Submitted to the Associate Administrator for Aviation Safety,
U.S. Federal Aviation Administration

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Thank you

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Copies of the Code of practice are available to buy at:
<https://www.maritimeuk.org/media-centre/publications/maritime-autonomous-surface-ships-industry-conduct-principles-code-practice/>