

Section: Resources and Personnel

Topic: MLC compliance section 13 (reg. 5.1.5) - On-board complaint procedure

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Objective

This procedure must come into force in case a seafarer wants to make a formal complaint in connection to his/her living conditions, wages or other of seafarers' rights.

The Master to ensure that the seafarer is informed about the existence of this procedure, and that a copy is handed out together with the seafarers' Employment Contract. The procedure must also be published onboard in a convenient and easy accessible public location.

The Complainer must not be subject to any kind of victimization upon the issuing of a complaint, as being a part of company's No Blame Policy as per ISM doc 2.1.0.

Procedure

1. Complaints are to be addressed to the complainers nearest superior or direct to the master of the ship in writing using ISM checklist #700.
2. The superior must register the written complaint by signing the form and stipulate a reasonable timeframe for corrective actions, a copy of this is given back to the seafarer as receipt.
3. The superior handles the complaint, when solved the complainer receives the complaint form filled out with signature and corrective actions. The complainer signs the form if satisfied with the corrective action.
4. In case the outcome of the complaint has not been to the satisfaction of the complainer, or has the time frame of the process of the complaint not been met, the complainer can appeal the decision to the Master who shall then deal with the matter personally.
5. If the complaint cannot be resolved onboard it is to be directed by the master to the company through marine@dfds.com, who will if necessary set a new deadline for corrective action and report back.

In all cases the complainer can always file a complaint direct to the company (marine@dfds.com), to the flag state or the maritime authority in his/her country of residence. To this no standard form is needed.

The complainer has the right to be represented / accompanied by an appointed seafarer(s) at meetings etc. in connection with the complaint, on DFDS vessels the elected safety representatives has been appointed to assist a complainer. The name of the safety representatives can be found on the posted safety committee board.

Copies of all signed complaint forms with corrective actions are to be handed over to the Master who must ensure that these are recorded onboard and if beneficial to be discussed at Management Meetings or Safety Committee meetings onboard. Furthermore they are to be send to marine@dfds.com

In case the Master must process a complaint on own behalf, it must be direct to the company through marine@dfds.com

Contact information flag state authorities

A list with contact information to the relevant Maritime Authorities shall be posted on board so the crew have access to this information in case they want to file a MLC complaint to these authorities.

On the ILO website www.ilo.org you can search for contact information for the various MLC authorities.

On the DMA website www.dma.dk you can complain directly to the DMA about MLC-related issues.