

Criteria for the Vetting of Training

Draft 2.0



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This document is intended to provide a framework for discussion on the topic of how the Association can apply a credible vetting process to be applied when members seek the endorsement of the Association for their training.

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Revisions

| Serial | Date | Change | By | Authority |
|--------|--------------|--------------------------------------|----------------------------|-----------|
| v1.0 | 11 Sept 2010 | Initial draft for discussion | (AMcDougall / EvSec) | Exec |
| V1.1 | 11 Sept 2010 | Comments incorporated | (DStone / APPDS) | Comments |
| V1.2 | 11 Sept 2010 | Comments incorporated | (MMurrell / ISSG Holdings) | Comments |
| V1.3 | 23 Oct 2010 | Draft for Public Consult | AMcDougall | Comments |
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Intent

1. The purpose of this document is to provide an initial framework for discussion purposes.
2. This discussion will focus on the vetting process to be used by the Association when deciding whether or not (and to what extent) it will endorse the training.

Background

3. Within the maritime security domain, personnel must be competent and capable in the tasks that they are assigned or otherwise undertaking.
4. The training of personnel must be considered more than an issue of regulatory compliance. It must be based upon the following:
 - 4.1. Ensuring that the individuals conducting the tasks are protected against physical or mental harm;
 - 4.2. Ensuring that the organization offering the training has a reasonable expectation that the goals of the training will be met and can be applied in all reasonably foreseeable operating environments;
 - 4.3. Ensuring that those in proximity to the task are not placed at undue risk in terms of personal injury, injury to property, disruption of business or other forms of injury; and
 - 4.4. Ensuring that social issues and concerns are properly addressed and reflective of the appropriate Treaties, Conventions, Laws, Regulations or other cultural / social norms.

Coming into Force

5. This document will come into force upon its publication, currently set as being 01 May 2011.

Certification, Training and Awareness

6. The Association will clearly distinguish between certification, training and the making of persons aware (awareness). These are defined as follows:
 - 6.1. **Certification** – the communication of knowledge, the testing of an individual against that body of knowledge and the verification of experience relevant to that knowledge to give an assurance that the individual possesses the necessary knowledge, skills, abilities and experience to take on a specific kind of task;
 - 6.2. **Training** – the communication of knowledge and the testing of an individual to give an assurance that an individual possesses the relevant knowledge pertaining to a specific subject; and

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- 6.3. **Awareness** – also referred to as “familiarization” training involves the communication of information and *may, or may not*, involve testing to determine if the individual does possess the knowledge at the end of the awareness session.
7. The Association will require that the course clearly indicate whether or not the individual is “certified”, “trained” or “considered familiar” on the document issued to the candidate.
 - 7.1. The instructor has a degree of discretion with respect to the level of document being issued in that the instructor may decide to design course that offers a level of instruction above and beyond that normally required by regulators or industry practices
 - 7.2. The onus is on the instructor to have conducted any checks with respect to the history or experience of the individual where certification is involved; and
 - 7.3. The instructor also has a degree of flexibility with respect to the level of document being issued in that the instructor may, based upon his or her professional opinion and not on any discriminatory grounds as described in the United Nations Universal Declaration of Human Rights, opt to issue a document that does not indicate that the individual is certified but rather trained. This applies in situations where, in the professional or expert opinion of the instructor, the performance of the candidate points to the candidate not performing as would be reasonably expected by the candidate’s past experience.
8. Where an individual is being considered as “trained” or “certified”, the organization offering the training must indicate the period for which the training or certification is considered valid. The period defined will describe the period during which the individual would not require additional or supplemental refresher training in order to remain current.
 - 8.1. It is anticipated, given the current clime of maritime security doctrine, that a period of certification would not exceed a period of two years for certifications that do not include the requirement to maintain the currency of the knowledge through continuing education or five years where such measures are included.
 - 8.2. Similarly, the certification upkeep period may be adjusted by the issuing authority (Submitter) where, in the opinion of the Submitter and the representative of the Association, there have been significant changes that warrant refresher or upkeep training.

Constitutional Authority

9. This effort is considered to fall under Section 11(a) (iv) of the Constitution describing *Reviews, Endorsement and Vetting*.
10. The structure of the committee used to vet training is considered to fall under Section 10 describing *Ad Hoc Committees*.
11. The *Ad Hoc Committee* shall report to the Executive. The specific reporting can be made to any member of the Executive but shall remain constant. This is consistent with the roles of the Executive Positions described in Section 8 pertaining to the *Board of Directors*.
12. The *Ad Hoc Committee* must take into account and respond to members of the Core Operating Staff as described in Section 9 of the Constitution.

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Constraints on those Conducting Assessments

13. All persons conducting assessments must have completed the Non-Disclosure Agreement and Code of Practice. A statement from the individual conducting the assessment may be required to further reinforce that they have agreed to these steps as published on the www.iamsonline.org website.
14. All persons conducting assessments must indicate that they understand that they are responsible for ensuring the appropriate safeguarding of the proprietary information of the submitter.
15. All submissions will be held in either electronic copy under a lock controlled by the CIO or, when in physical format, by the Chief Quality Assurance Officer
16. The Submitter must agree to hold harmless the Association with respect to any losses where the Association can demonstrate that it has taken reasonable steps to protect the proprietary information.

Core Tasks

17. The Executive of the Association shall maintain this process and publish it to ensure full transparency in the process.
18. The Submitter of material determines the level of submission desired. At this point, no commitment has been made.
19. The Submitter and representative of the Association (member of the Executive, the Chief Quality Assurance Officer or Chief Professional Development Officer) assess the level of effort needed to conduct the assessment in terms of person-hours of effort. This must be agreed to by both parties.
20. The representative of the Association and the Submitter agree to a Member in good standing who will review the work. This is done so that the Association has a level of assurance that the review will be conducted appropriately and that the Submitter has a level of confidence in the reviewer's intent and ability to protect proprietary information appropriately. The agreed-upon reviewer must be ratified by the Executive.
21. Upon ratification, each individual involved in receiving a copy of the Submitter's training shall indicate that he or she understands that the information is proprietary and the property (solely) of the Submitter, that such information and all comments upon it are only to be communicated to those involved directly in the review or the Executive of the Association in the course of performing official duties.
22. Once all parties understand the need to protect the proprietary information, the scoring sheet is developed for the course. This will be broken down by modules with a total score provided per module and agreed to between the Submitter, Reviewer, and the representative of the Association.
23. Once the scoring sheet has been developed, the reviewer will complete the sheet, indicating which of the scores applies to that particular topic or statement and forwarding it to the representative of the Association.
24. Before the Reviewer commits any resources, the Submitter must provide an assurance that all coordination costs have been covered and that there is an agreement with respect to costs due to

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the Reviewer. These costs are not to include any returns beyond the immediate time spent assessing the material and reasonable costs. The Reviewer will not accept any benefit that may result as a return from his or her work.

25. The representative of the Association will validate the information on the sheet as being complete and follow up with the Submitter to determine if any additional details need to be provided on any specific points. These points may include scores or statements that cannot be assessed or that score significantly lower on the scoring sheet.
26. The Submitter will provide any comments back to the representative of the Association.
27. Once comments have been received back from the Submitter, the final determination will be made between the Submitter, Reviewer and representative of the Association. The representative of the Association will document the results and include them in a letter, fit for public use, to the Reviewer and the Assessor.

Endorsement Structure

28. The Association shall maintain three levels of endorsement:
 - 28.1. **Bronze** – where the review is limited to the Course Training Standard, outline or similar documentation;
 - 28.2. **Silver** – where the review is limited to the documentation associated with the Bronze level and also an interview with the developer of the course (Submitter) to include statements or actions that will be demonstrated in the training; and
 - 28.3. **Gold** – where the review includes all aspects of the Silver and also includes attendance and direct observation of the conduct of a course by a Reviewer.
29. Costs associated with the above are the responsibility of the submitter and not subject to reimbursement based on the outcome of the assessment.
 - 29.1. Where bronze and silver reviews are being sought, electronic documentation is considered to be acceptable.
 - 29.2. Where gold endorsement is being sought, it is recommended that an agreement be reached between the Submitter and Reviewer in order to arrive at alternatives that are not cost prohibitive. It is understood that the Reviewer and the Submitter may arrive at an arrangement where a mutually agreed upon person closer to the venue may be used.
 - 29.3. It is also understood that the Review for Gold Endorsements may not happen all at once. Once all the criteria for silver has been met, the individual can begin to claim the silver status with the review for gold happening at a later, but mutually arranged upon, time.

Determination of Expertise and Professional

30. The determination of expertise will be based upon the criteria used to establish expertise in the courts. While there is a level of subjectivity understood in this process, the assessment must be based on clearly demonstrable grounds:

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- 30.1. Formal education from accredited institutions that deliver that training normally;
 - 30.2. Certification by professional bodies (not business interests);
 - 30.3. Experience directly in the matter being discussed; and
 - 30.4. Recognition by peers that the level of knowledge being communicated is beyond the average.
31. The determination of the concept of a professional shall be based upon the following criteria:
- 31.1. Formal education or acceptance of a critically reviewed, peer developed body of knowledge;
 - 31.2. A demonstration that the individual is competent in that body of knowledge (certification);
 - 31.3. Confirmation that the individual follows a regime of continuous learning or upkeep of that body of knowledge;
 - 31.4. Verification that the individual practices or applies that body of knowledge (experience); and
 - 31.5. Confirmation that the individual's actions are subject to oversight by a body with no vested interest and an acceptable code of conduct and that the individual has not breached that code of conduct.

Standard for Selection of Instructors

32. The Submitter of the training should be able to demonstrate expertise in the material involved. This is considered to be desirable, but not mandatory, because the material will be assessed on its own merits.
33. The instructors used must be able to demonstrate a level of expertise with respect to the material that they are instructing. This is to ensure that candidates have the opportunity to interact with experts during the training process.

Standard for Selection of Reviewers

34. The Reviewer must be considered to be a professional as defined above and be able to demonstrate expertise. This must be agreed to by both the Submitter and the representative of the Association.
35. The Reviewer must be a Member in good standing.
 - 35.1. Where the Association does not have an agreed upon Member in good standing, an outside professional may be agreed upon but will be required to submit the Non-Disclosure Agreement and the Code of Practice before undertaking tasks.
36. The mechanics for the selection of the Reviewer is included above.

Attribution of Work / Derived Works

37. Where training is developed based on the work of other persons, the training material must make reference to that previous work. Failing to give proper attribution for work is considered to be a violation of the Code of Practice.

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38. Where another Member's work is being used as source material for training, it is considered to be a professional courtesy and practice for an arrangement to be made regarding the use of the work. This is, of course, above and beyond any legal or regulatory requirements that would reasonably be considered in force.

Identifying the Checks to be Conducted

39. The checks required by the Association shall incorporate the following:
- 39.1. The requirements communicated within professional certification;
 - 39.2. The requirements communicated within regulatory regimes;
 - 39.3. The recommendations communicated through industry-accepted best practices; and
 - 39.4. The recommendations developed through the critical thinking and peer review of demonstrably competent professionals.
40. No requirement shall be blindly accepted. Each must be reviewed by competent persons to ensure that the specific details are appropriate.

Development of Scoring Sheet

41. A scoring sheet may be developed for either a full course or a specific module within a course. The letter indicating endorsement must clearly indicate what is being considered to be endorsed.
42. Each specific claim or statement made in the training will constitute one line item on the scoring sheet and will be scored in accordance with the matrix below.
43. The scoring sheet for each module of training will include the opportunity for comments by those conducting the assessment. All statements made by those conducting the assessment must be fully attributable (name).

Scoring of Checks

44. The following definitions apply with respect to *the source* of the information:
- 44.1. **Common Practice:** the material is based upon a commonly accepted practice within the industry and has not been commented upon negatively by an authoritative body (accepted practice);
 - 44.2. **Drawn from Guidance Material:** the material is based upon a commonly accepted *best practice* that has been published by a party with no vested interest in the training beyond being involved in the same subject;
 - 44.3. **Drawn from Expert Comment:** The statement by an individual meeting all the criteria defining an expert above (and free of any vested interest) that the statement is sound;
 - 44.4. **Drawn from Professionally endorsed:** The statement is included in an Association's body of knowledge, subject to peer review and periodic updating and supported by a community of experts.
45. The following definitions apply with respect to *the nature of verification or supporting documentation* pertaining to the statement made in the training:

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- 45.1. **Cited** – The work includes a reference to the source of information that can be followed up upon by those conducting the check;
- 45.2. **Documented** – The work includes a link or copy to the reference material from which it is drawn, allowing for the individual conducting the check to determine the specific statement and evaluate the context within which it was made;
- 45.3. **Verified** – The work includes the reference and a statement made by an outside party (an expert) that the documentation or citation exists and is in use within an credible and trustworthy community that is subject to legal or similar oversight; and
- 45.4. **Validated** – The work includes the reference and a statement made by an outside expert that the documentation or citation exists and that the reference is valid for the context in which it is being applied.

46. The scoring of the checks shall be based upon the following hierarchy:

| | Common Practice | Guidance material | Expert Comment | Professional Endorsed |
|------------|-----------------|-------------------|----------------|-----------------------|
| Cited | 1 | 2 | 3 | 4 |
| Documented | 2 | 3 | 4 | 5 |
| Verified | 3 | 4 | 5 | 6 |
| Validated | 4 | 5 | 6 | 7 |

Accepted Standards

47. Accepted standards will be identified based on the content of the course.
48. Accepted standards must meet all of the following criteria:
- 48.1. Be developed through a consultative process involving experts and those affected by the standards;
- 48.2. Be subject to critical review by those who can legitimately claim expertise;
- 48.3. Be subject to oversight by a third party with no vested interest beyond the maintenance of the standard; an
- 48.4. Be subject to periodic reviews.
49. The determination that a standard is pertinent sets a precedent for future use, but only in the same usage and context. A list will be maintained and published on the Association website for those seeking reference materials to use when developing further training. Where reference material must be purchased, it is the responsibility of the Submitter.

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Development Standards

50. The development of courses seeking endorsement must be subject to a Quality Assurance policy and consistent development methodology. These include standards such as those published by ISO or similar bodies.
51. Where certification is involved, the International Organization for Standardization (ISO) Standard 17024:2003 is considered to be the baseline standard.

Outcomes

52. The outcomes of a review are limited to the following:
 - 52.1. **Not suitable** – where the work cannot be promoted in good faith, even with major revisions;
 - 52.2. **Further work recommended** – where the work scores consistently below 70% of the total score per module. Further work may also include further documentation of sources.
 - 52.3. **Suitable (with level of endorsement)** – where the work scores over 70% for the modules.
53. The outcome will represent the level of endorsement on a module-by-module basis. Where endorsement is being communicated, any communication must include the following:
 - 53.1. The name of the module assessed;
 - 53.2. The level of endorsement (gold, silver or bronze); and
 - 53.3. That the module exceeded the minimum standard of 70%.
54. Where endorsement is being communicated, a link to these specific processes must be included on the same page and be clearly visible.
55. The outcome of the review process applies only to that material submitted. Where changes are made to a course, the material must be resubmitted and meet or exceed the original criteria in order to maintain the endorsement.

Costs to Maintain Endorsement

56. All costs associated with the maintenance of the endorsement are the responsibility of the Submitter. Due care must be taken in ensuring that the costs are correctly identified as early in the process.
57. A two percent (2%) levy is applied to each candidate taking a course. This is not due until the course is formally endorsed and will not include any previous iterations of the course. The fee is due upon conclusion of the course and not later than 60 days following the issuance of certificates.
 - 57.1. The minimum levy is for a period of six months following the issuance of the documents indicating the course has been vetted and found suitable; and
 - 57.2. Only for so long as the course provider uses the endorsement.

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Use of Logos

58. The use of logos is covered under the *Use of Logos* policy covered on the Association website.

Reporting and Returns

59. Annually, based on the date of the original endorsement, the Submitter must provide a report that indicates the following:

- 59.1. Any changes made to the course material;
- 59.2. The number of participants that have taken the course; and
- 59.3. Any comments regarding the utility of the vetting / endorsement process.

60. Where a report is determined to be deliberately misleading, it is considered to be a clear violation of the Code of Practice and will automatically result in the removal of all endorsements and privileges of the individual.

Revisions

61. This document is subject to annual review by the Board of Directors and Core Operating Staff.

62. The next review is anticipated to be in May 2012.