

EVERY MARINER BUILDS A RESPECTFUL CULTURE (EMBARC)

Vessel Operator’s Compliance with EMBARC Standards for Sea Year Eligibility SELF-ASSESSMENT CHECKLIST

| Item No. | EMBARC Section | EMBARC REQUIREMENT | STATUS | COMMENTS |
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| | | | Completed or ETC Date | |
| Immediate Actions: | | | | |
| 1 | II.1 | Agreed to comply with the EMBARC Standards and affirmed completion of the immediate action items. Submitted copies of SASH policies with the completed checklist and affirmation document. | | |
| 2 | II.2 | Agreed to conduct self-assessments of compliance with the EMBARC Standards annually, to submit the results of all self-assessments to MARAD, and to submit copies of SASH policies together with assessment results. | | |
| 3 | II.3 | Agreed to permit MARAD—including third parties engaged by MARAD—to conduct recurring assessments of compliance with the EMBARC Standards. | | |
| 4 | III.1 | Agreed that SASH reporting policies and procedures that ensure compliance with the EMBARC Standards will be operational upon enrollment in EMBARC. | | |
| 4.1 | III.1 | Completed SMS revision within 90 days. | | |
| 4.2 | III.1 | SMS Revision approved by SMS approval authority (e.g., ABS). | | |
| 5 | III.2 | Designated a primary company SASH Contact ashore for all SASH issues (SASH Contact) who has completed the free 40-hour Victim Assistance Training Online provided by the Office for Victims of Crime Training & Technical Assistance Center and attain the National Advocate Credentialing Program provisional level certification (https://www.thenacp.org/) or an equivalent training program. | | |
| 6 | III.3 | Established process to confirm that cadets will have (1) a virtual or in-person meeting | | |

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| | | with the SASH Contact before joining a ship; or (2) if there is inadequate time between a cadet's assignment to a vessel and the cadet's embarkation, the SASH Contact shall make contact with the cadet within 48 hours of the cadet's embarkation (via the cadet's satellite phone if the cadet is equipped with such a device). | | |
| 7.a | III.4.a | Implemented measures to confirm that SASH Contacts and cadets can communicate as needed once a cadet is on board, including measures to require that the SASH Contact initiate contact with each assigned cadet within the first 7 days of vessel onboarding. | | |
| 7.b | III.4.b | Implemented process to confirm that the SASH Contact shall respond to cadet outreach no later than the next business day. | | |
| 7.c | III.4.c | Established policies that ensure that whenever a cadet is aboard a vessel for more than 30 days, the SASH Contact shall initiate contact, via email, with the cadet at least every 14 days. | | |
| 7.d | III.4.d | Established policies that require the SASH Contact to encourage and honor requests from cadets for increased frequency of check-ins. | | |
| 7.e | III.4.e | Established policies that ensure the SASH Contact makes a record of any possible violations and ensures prompt and thorough investigation and corrective action, where appropriate, and/or referral to proper authorities. | | |
| 8 | III.5 | Established process to reinforce safety practices (including SASH prevention, bystander intervention, reporting procedures, and alcohol prohibitions) frequently with every cadet and crew member through onboard or virtual meetings in accordance with company procedures. | | |
| 9 | III.6 | Established policies that prohibit cadets from entering the stateroom of any other crew member; prohibit ship's crew members from entering cadets' private | | |

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| | | staterooms for any reason other than official maintenance or housekeeping duties during appropriate working hours and with adequate notice. | | |
| 9.1 | III.6 | Provided and checked functional door locks for all cadet staterooms. | | |
| 9.2 | III.6 | Established a list of all master key holders with access to cadet staterooms identified by position. | | |
| 9.3 | III.6 | Implemented policies to establish and maintain open-door office or workspace interaction between cadets and other ship employees, except when impractical due to vessel compartment configuration or safety procedures. | | |
| 10 | III.7.a | SMS established quarterly training requirements on SASH prevention, bystander intervention, reporting, and response procedures for all shipboard personnel (regardless of whether cadets are onboard). | | |
| 10.1 | III.7.a | Established procedure to ensure that cadets shall attend, but shall not have any role in managing, this training. | | |
| 11 | III.7.b | Established procedure to ensure that all officers and crew shall be required to complete the Maritime Sexual Assault and Sexual Harassment Prevention Training before a cadet is embarked and to repeat the training annually. ¹ | | |
| 12 | III.7.c | Established process to incorporate SASH discussions in periodic Vessel Safety Meetings using materials similar to those in the Facilitator's Guide and Student Workbook in the SOCP SASH Tool Kit . | | |
| 13 | III.7.d | Provide copies of vessel operator's SASH prevention policies and reporting procedures to each cadet upon boarding the vessel. | | |
| 14 | III.7.e | Displayed company policies prohibiting SASH, retaliation, drug and alcohol usage, and cadet presence in crew member staterooms/crew member presence in cadet staterooms on board. | | |
| 15 | III.7.f | Displayed posters and guides that support | | |

¹ This interactive Computer Based Training (CBT) is available at no charge from [SOCP](#).

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| | | a respectful and inclusive workplace culture. Displayed SASH prevention, reporting, and response posters prominently in common areas of the vessel. | | |
| 15.1 | III.7.f | Displayed such posters in shoreside facilities to which cadets have access. | | |
| 16 | III.7.g | Distributed the quick reference guide brochures in the SOCP SASH Tool Kit ² or other comparable materials to all crew, officers, cadets, and all shore-based personnel who interact with or have responsibilities related to officers, crew and cadets. Provided tips for prevention of and response to SASH behaviors as appropriate for each intended audience. | | |
| 17 | III.7.h.i | Established procedure to require Vessel Masters to introduce cadets to ship's company employees as soon as practicable after boarding to foster an open, welcoming environment for Sea Year students. | | |
| 18 | III.7.h.ii | Established procedure to require Vessel Masters to ensure that cadets are familiarized with the ship during onboarding in accordance with the SMS. | | |
| 19 | III.7.i | Established process to ensure that reporting procedures provided to officers, crew, cadets, and posted on the vessel shall include: <ul style="list-style-type: none"> i. Contact information for the Vessel Operator's SASH Contacts. ii. Point of contact information for notifications to the Coast Guard. | | |
| 20 | III.8.a | Established procedure to ensure that when cadets are embarked, vessel Operator shall immediately (within 24 hours after learning of an allegation) notify USMMA of an allegation of SASH-involved behavior, regardless of whether the behavior involves a cadet. | | |
| 20.1 | III.8.a | Established procedure to ensure that, for incidents involving a cadet, Operator shall provide a complete report of investigation | | |

² This [SOCP SASH Tool Kit](#) is available at no charge from SOCP.

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| | | to USMMA when concluded. | | |
| 20.2 | III.8.a | Established policies that require (1) thorough investigation of alleged violations of the SASH policy that meet best practices for investigations of sexual assaults and sexual harassments; and that (2) interviews be conducted using trauma-informed interview methods. | | |
| 21 | III.8.b | Established company policies that require that that all shipboard complaints of a sexual offense prohibited under current law must be immediately reported to the Coast Guard. These notifications can be made to the Coast Guard National Command Center at +1 (202) 372-2100, or an attributed report through CG Tips. | | |
| 22 | III.8.c | Established procedure that encourages company leadership to inform the Coast Guard of adverse or disciplinary actions that result in termination or a probationary status of any crewmember for harassment or SASH. Reports of mariner misconduct should be made to nearest Coast Guard Officer In Charge, Marine Inspection which can be found at the following website: https://www.uscg.mil/contact/ . | | |
| 23 | III.9 | Reviewed company policies within the SMS to determine if they are at least as comprehensive as those listed in the SOCP Best Practices Guide ³ and revised as necessary, including but not limited to the following policies: | | |
| 23.1 | III.9.a | <ul style="list-style-type: none"> a. Employee Best Practices: <ul style="list-style-type: none"> i. Best Practice #1: Reporting of Sexual Harassment & Sexual Assault ii. Best Practice #2: Basic Do's and Don'ts iii. Best Practice #3: Safety on Shore Leave iv. Best Practice #4: Response to Sexual Harassment & Sexual Assault v. Drugs & Alcohol vi. Company Investigation Process | | |

³ The [SOCP Best Practices Guide](#) is available at no charge from SOCP.

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| | | vii. Victim Advocacy viii. "Did You Know?" | | |
| 23.2 | III.9.b | b. Vessel Operator Company Best Practices: i. Best Practice #1: Defining Sexual Harassment & Sexual Assault ii. Best Practice #2: Nurturing a Culture Free of Sexual Harassment & Sexual Assault iii. Best Practice #3: Development of Prevention Policies iv. Best Practice #4: Effective Training on Sexual Harassment & Sexual Assault Prevention and Response v. Best Practice #5: Establishing Reporting Options vi. Best Practice #6: Response to Sexual Harassment & Sexual Assault | | |
| 24 | III. 10 | Agreed to meet with MARAD, USMMA and other invited government and industry participants quarterly, or as called by DOT/MARAD/USMMA, to assess compliance with SASH policies and implement any necessary adjustments and/or corrections. | | |
| Intermediate Actions: | | | | |
| Commits to implementing the following intermediate actions: | | | | |
| 25 | IV.1 | Within one year, implement master key control systems, manual or electronic, for the vessel. | | |
| 26 | IV.2 | Within one year, develop and implement recommended SASH Contact training and annual refresher training for designated SASH contacts to include survivor advocacy and instruction in training and education principles. | | |
| 26.1 | IV.2 | Within one year, appoint and train an appropriate number of designated SASH contacts to ensure that an adequate number (minimum one primary and one alternate) are always available. | | |
| 27 | IV.3 | Within one year, work with other Vessel | | |

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| | | Operators, labor, academies, SOCP and/or other industry organizations, SASH subject matter experts, MARAD and other stakeholders to review and enhance SASH policies used by vessel operators. | | |
| 27.1 | IV.3 | Within one year, participate and provide input—with other Vessel Operators, labor, academies, other industry organizations, SASH subject matter experts, MARAD and other stakeholders—in the revision of the SOCP SASH Best Practices Guide, including: Development of best practices and templates to support incorporation of SASH prevention, reporting, and response as well as internal audit and external audit procedures into Company and Vessel Safety Management Systems. | | |
| 28 | IV.4 | Within one year, work with other Vessel Operators, labor, academies, industry organizations, SASH subject matter experts, MARAD, and other stakeholders to develop enhanced policies and training pertaining to bystander reporting requirements and bystander duty to intervene in SASH incidents. | | |
| 29 | IV.5 | Within eighteen months, collaborate with other Vessel Operators, maritime labor unions, academies, union training schools, SASH subject matter experts, MARAD and USCG to develop and implement expanded mandatory annual SASH training for all crew members including, but not limited to: a. SASH (including bystander intervention); b. Micro aggression consciousness; c. Cadet relationships; d. Creating and maintaining a respectful work environment; and e. Testing or other mechanism to confirm crew proficiency with SASH principles. | | |
| 30 | IV.6 | As soon as practicable, but not later than two years, work with other Vessel Operators, labor, Academies, industry organizations, SASH subject matter experts, MARAD, USCG, and other stakeholders to develop, establish and participate, to the extent permissible under | | |

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| | | law, in the maintenance and operation of a SASH perpetrator information exchange. The exchange shall contain the names of all merchant mariners who are the subjects of substantiated reports of discriminatory, SASH-related, violent, or other violative behavior, or who were terminated in related proceedings; the incident dates; the bases of substantiation; and the disposition of each circumstance shall be recorded and accessible to all operators of U.S.-flag vessels. | | |
| Long-Term Actions: | | | | |
| Commits to work together to develop, in coordination with the MARAD and other Government and maritime industry participants, long-term actions, as soon as feasible, which may include: | | | | |
| 31 | V.1 | Consideration of a range of possible measures to address accountability for the SASH climate onboard Vessel Operator ships, including: <ul style="list-style-type: none"> a. training records maintenance; b. identified perpetrator tracking and record keeping, to the extent permissible by law; c. recorded video monitoring of, at a minimum, passageways immediately adjacent to cadet staterooms. d. enhanced Diversity, Equity, and Inclusion (DEI) initiatives and practices in the mariner workforce; e. training and credentialing of officers at the Provisional level by the National Advocate Credentialing Program. | | |
| 32 | V.3 | Collaboration with the U.S. Coast Guard, other vessel operators, mariner unions and industry organizations to develop the requirements of a merchant mariner credential that satisfies training requirements for SASH Contacts and designated onboard officers or other persons ashore to attain and maintain respective Basic and Provisional NACP training levels. | | |